

ATTACHMENT II TO IPN-93-017

SAFETY EVALUATION OF
TECHNICAL SPECIFICATION CHANGES AND
QUALITY ASSURANCE PROGRAM CHANGES
ASSOCIATED WITH OPERATIONS MANAGER REQUIREMENTS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

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SAFETY EVALUATION
RELATED TO
PROPOSED TECHNICAL SPECIFICATION AND QUALITY ASSURANCE PROGRAM
CHANGES ASSOCIATED WITH
OPERATIONS MANAGER REQUIREMENTS

Section I - Description of Changes

This application for amendment to the Indian Point Unit 3 (IP3) Technical Specifications proposes to revise Sections 6.2 and 6.3 of Appendix A of the Operating License. The proposed revisions to Technical Specification 6.2.2.i would remove the condition that the Operations Manager hold a Senior Reactor Operators (SRO) license, and replace it with the requirements that the Assistant Operations Manager hold an SRO license and the Operations Manager either hold or has held an SRO license at IP3. Proposed revisions to Technical Specification 6.3.1 would modify the requirement that the Operations Manager meet or exceed ANSI N18.1-1971 qualifications. These changes will also affect the Quality Assurance Program description provided in the IP3 Updated Final Safety Analysis Report.

Section II - Evaluation of Changes

Technical Specification 6.2.2.i currently requires that the Operations Manager hold an SRO license. The Authority proposes to delete this requirement. In place of this requirement, the Authority proposes to add the requirements that the Assistant Operations Manager hold an SRO license and that the Operations Manager either hold an SRO license or has held an SRO license at IP3.

Current practice at IP3 is to have two SRO licensed positions in charge of shift activities. These two positions are the Senior Reactor Operator and the Shift Supervisor. The Operations Manager does not directly supervise reactor operators, therefore, it is not necessary that the Operations Manager hold an active SRO license. The Assistant Operations Manager is directly in the reporting hierarchy between the Shift Supervisors and the Operations Manager. The day to day activities of the Operations department are carried out under the direction of the Assistant Operations Manager. Therefore, by requiring that the Assistant Operations Manager hold an active SRO license, there is assurance that the Shift Supervisors will report directly to an individual with a current SRO license.

In accordance with Technical Specification 6.3.1, the Assistant Operations Manager, as a member of the plant staff, will be required to meet or exceed the minimum ANSI N18.1-1971 qualifications for a comparable position. The minimum qualifications listed under "Operations Manager" in ANSI N18.1-1971 will be considered to be the applicable qualifications for the Assistant Operations Manager. Therefore, Shift Supervisors will report directly to an individual with the same knowledge and experience expected of an "Operations Manager."

Additionally, since the Operations Manager will no longer meet all the qualifications of "Operations Manager" listed in ANSI N18.1-1971, the Authority proposes to modify Technical Specification 6.3.1. The ANSI N18.1-1971 qualifications for "Operations Manager" include a requirement that the Operations Manager, at the time of appointment to the active position, hold an SRO license. The Authority proposes to modify Technical Specification 6.3.1 to state that the Operations Manager shall meet or exceed the minimum qualifications of ANSI N18.1-1971 except for the SRO license requirement which shall be in accordance with the technical specifications. This will allow an individual who does not hold a current SRO license to be appointed Operations Manager provided all other qualifications of ANSI N18.1-1971 are met and the individual has held an SRO license at IP3.

The proposed technical specification changes will allow for a reduction in the substantial burden of license requalification training for the Operations Manager. This will enhance the Operations Manager's ability to effectively carry out the managerial oversight of the Operations Department. Since the Operations Manager will be required to meet the experience and education requirements of ANSI N18.1-1971 and will be required, as a minimum, to have held an SRO license at IP3, there is assurance that the Operations Manager will be a knowledgeable and qualified individual. By requiring that the Assistant Operations Manager hold a current SRO license, there is assurance that high level management within the Operations Department will maintain a knowledge of current plant systems and operations.

These technical specification changes are expected to enhance the Operations Manager's ability to effectively carry out the primary responsibilities of that position, and to have an overall positive effect on the safe and efficient operation of Indian Point 3.

Section III - No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

- (1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response:

The proposed changes do not involve an increase in the probability or consequences of a previously analyzed accident because Shift Supervisors and Senior Reactor Operators will still be required to maintain a current SRO license. This ensures that shift activities are directed by persons holding SRO licenses. The Shift Supervisors will report directly to an individual with an SRO license and qualifications of an "Operations Manager" per ANSI N18.1-1971. The Operations Manager will continue to be a knowledgeable and qualified individual.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response:

The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because they do not affect plant configuration or plant design. Senior Reactor Operators and Shift Supervisors are still required to maintain a knowledge of current plant configuration and operation through SRO license requalification training. This ensures that shift activities will be directed by persons holding SRO licenses. Additionally, the Shift Supervisors will report directly to an individual with an SRO license and qualifications of an "Operations Manager" per ANSI N18.1-1971 and the Operations Manager will continue to be a knowledgeable and qualified individual.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response:

The proposed amendment does not involve a significant reduction in a margin of safety because Shift Supervisors and Senior Reactor Operators will still be required to maintain a current SRO license. This ensures that shift activities are directed by persons holding SRO licenses. Additionally, the Shift Supervisors will report directly to an individual with an SRO license and qualifications of an "Operations Manager" per ANSI N18.1-1971 and the Operations Manager will continue to be a knowledgeable and qualified individual. These changes are expected to enhance the Operations Manager's ability to effectively carry out the primary responsibilities of that position, and to have an overall positive effect on the safe and efficient operation of Indian Point 3.

Section IV - Quality Assurance Program Description Change

The proposed technical specification changes described above constitute a change to the Quality Assurance Program description provided in the IP3 Updated Final Safety Analysis Report (FSAR). Specifically, the proposed changes constitute a change to the commitment to Regulatory Guide 1.8, September 1975, in that the Operations Manager will no longer be required to meet the SRO license requirement of ANSI N18.1-1971. However, since the Assistant Operations Manager will meet the SRO license requirement of ANSI N18.1-1971 and the Operations Manager will continue to be a knowledgeable and qualified individual, the intent of the commitment will continue to be satisfied. Therefore, the revised Quality Assurance Program will continue to satisfy the criteria of 10 CFR 50, Appendix B, and the intent of the Quality Assurance Program commitments previously accepted by the NRC. The revised FSAR pages associated with this change will be submitted to the NRC with the applicable annual IP3 FSAR update submittal.

Section V - Impact of Changes

These changes will not adversely affect the following:

ALARA Program
Security and Fire Protection Programs
Emergency Plan
FSAR or SER Conclusions
Overall Plant Operations and the Environment

Section VI - Conclusions

The incorporation of these changes: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the bases for any technical specification; d) does not constitute an unreviewed safety question; e) involves no significant hazards considerations as defined in 10 CFR 50.92; and f) will not reduce the intent of any Quality Assurance Program commitments.

Section VII - References

- a) IP3 FSAR
- b) IP3 SER
- c) ANSI N18.1-1971
- d) Regulatory Guide 1.8, September 1975

ATTACHMENT III TO IPN-93-017

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COMMITMENTS RELATED TO TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH OPERATIONS MANAGER REQUIREMENTS:

1. The Assistant Operations Manager, as a member of the plant staff, will be required to meet or exceed the minimum qualifications listed under "Operations Manager" in ANSI N18.1-1971.
(This commitment will be satisfied prior to the implementation date stated in the NRC approved license amendment associated with this technical specification submittal.)
2. The Assistant Operations Manger will be required to hold a Senior Reactor Operator license.
(This commitment will be satisfied prior to the implementation date stated in the NRC approved license amendment associated with this technical specification submittal.)
3. The Operations Manager will either hold an SRO license or will have held an SRO license at IP3.
(This commitment is currently being satisfied since the Operations Manager is currently required to hold an SRO license.)
4. The Operations Manager will meet or exceed the minimum qualifications of ANSI N18.1-1971 except for the SRO license requirement which shall be in accordance with commitment number 3, above.
(This commitment is currently being satisfied since the Operations Manager is currently required to meet or exceed all requirements of ANSI N18.1-1971.)
5. The Shift Supervisors will report directly to an individual with a current SRO license.
(This commitment will be satisfied prior to the implementation date stated in the NRC approved license amendment associated with this technical specification submittal.)

COMMITMENTS RELATED TO QUALITY ASSURANCE PROGRAM CHANGES ASSOCIATED WITH OPERATIONS MANAGER REQUIREMENTS:

6. The revised Final Safety Analysis Report (FSAR) pages associated with the change to the Quality Assurance Program description will be submitted to the NRC with the applicable annual IP3 FSAR update submittal.