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July 31, 1981

IPN-81-54

Director of Nuclear Reactor Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License Amendments



Dear Sir:

The purpose of this letter is to bring to your attention a recurring problem which we have experienced and for which prior correspondence has proved unavailing. This problem concerns the issuance of operating license amendments which are effective as of the date of issuance.

On numerous occasions, the Authority has been issued a license amendment to Facility Operating License (FOL) DPR-64 effective as of its date, which was several days prior to our receipt of same. Our March 19, 1979 letter (IPN-79-10) identified this as a problem since the I&E Resident Inspector may receive his copy of the amendment prior to its implementation at the plant; typically, several days are required to implement the amendment at the plant site. It is not practical to expect the facility to implement a license amendment in one day, especially when revisions to operating procedures or adjustments to plant conditions are necessary. For example, Amendment No. 34, issued January 15, 1981, required changes to approximately 12 procedures to implement numerous changes to the Limiting Conditions for Operation (LCOs). The Authority will be faced with a similar problem when sweeping changes to LCOs are required upon issuance of the Tech Specs for lessons learned category "A" items.

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This situation is not only undesirable from an inspection standpoint, but also from a safety standpoint. Two recent license amendments to FOL DPR-64 have contained errors with which the facility was required to comply until the appropriate corrections could be effected.

In our March 19, 1979 letter, we requested that unless otherwise dictated, all license amendments should be made effective twenty-one (21) days after the date of issuance. Where otherwise dictated (e.g., effective immediately), special arrangements must be made to deliver the amendment to the plant site by the effective date. The Authority hereby repeats this request in light of the above safety and inspection problems which the present procedure creates.

The Authority recognizes the fact that in the majority of cases, license amendments are issued in the identical form in which they were proposed and that your staff has verbally informed us of amendments on the date of their issuance. However, this procedure is not adequate in all cases and is always difficult for the Authority to administer.

In most cases, the NRC staff has issued license amendments only after a considerable period of time (e.g., five (5) months or longer) has expired since it was proposed by the Authority. The additional period of twenty-one (21) days is consistent with the time frame used in the approval process and will permit an orderly administrative implementation.

A copy of our March 19, 1979 letter is attached for your information. If you have any questions, please call.

Very truly yours,


J. P. Bayne
Senior Vice President
Nuclear Generation

cc: Mr. T. Rebelowski
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