POWER AUTHORITY OF THE STATE OF NEW YORK

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June 4, 1982
IPN-82-44

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

Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Post TMI Requirements

Dear Sir:

This letter responds to your May 5, 1982 request for commitments to implement certain NUREG-0737 items on a timely basis.

Attachment I to this letter provides the Authority's responses to each of the applicable items listed in the enclosure to your May 5, 1982 letter except those items for which no reply is needed (i.e., I.D.1, I.D.2, II.B.1, II.B.2.3 and II.F.2).

Should your or your staff have any questions regarding this matter, please contact Mr. J. Lamberski of my staff.

Very truly yours,

J. P. Bayne
Senior Vice President
Nuclear Generation

MITCHELL J. WEINSTEIN
Notary Public, State of New York
No. 30-4740329
Qualified in Nassau County
Commission Expires March 30, 1983

cc: attached

State of New York
County of New York

Subscribed and Sworn to before
me this 4th day of June 1982.

Notary Public

A046

cc: Mr. W. H. Baunack, Acting Chief
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
P.O. Box 38
Buchanan, New York 10511

Mr. T. J. Kenny, Resident Inspector
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
P.O. Box 38
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Mr. Ron Barton
United Engineers & Constructors, Inc.
30 S. 17th Street
Philadelphia, Pa. 19101

ATTACHMENT I

Response to NRC Staff
May 5, 1982 Letter

Power Authority of the State of New York
Indian Point 3 Nuclear Power Plant
Docket No. 50-286
June , 1982

1.A.1.3.1 Limit Overtime

The Indian Point Unit 3 Administrative Procedures (APs) presently contain restrictions which meet or exceed the requirements of the policy statement attached to the February 8, 1982 Generic Letter No. 82-02.

1.A.1.3.2 Mimimum Shift Crew

As stated in our February 8, 1982 letter (IPN-82-15), the Authority has reviewed its licensed operator training program and has determined that sufficient ROs will not be licensed by July 1, 1982 to provide the additional RO. Four (4) additional ROs have recently been qualified and are awaiting their licenses and one (1) is awaiting final proccessing of his exam. Three (3) of these individuals, however, will be used to replace existing ROs who will be removed from shift work to be trained for Senior Reactor Operator (SRO) licenses.

At this time, the Authority plans to provide the additional RO by November 1, 1983 contingent upon sufficient personnel being licensed during the next training cycle scheduled to begin following the cycle 3/4 refueling outage. During the interim period, the Authority will maintain the additional RO being provided by Consolidated Edison on an as needed reciprocal basis during Emergency Plan Conditions. The Power Authority normally maintains a five (5) section rotation for licensed operators. As additional operators are licensed in excess of these requirements they will be placed on a normal shift rotation in the control room.

I.C.1 Revise Emergency Procedures

NUREG-0737 required revised emergency procedure implementation by the first refueling outage after January 1, 1982. Generic letter 82-10 has since recommended implementation by the first refueling outage after October 1, 1982. Presently, the Authority understands that the NRC Commissioners are considering a revised implementation schedule for this item under the topic of SECY 82-111, "Requirements for Emergency Response Capabilities." Apparently, Commission action on this document is scheduled for June 1982. The Authority will respond to this item once Commission action on SECY 82-111 is complete.

II.D.1.2 RV & SV Test Programs

As indicated in our March 25, 1982 letter (IPN-82-28), the preliminary submittal, based on the review of generic test program results, was transmitted directly to the NRC by Mr. David Hoffman of the EPRI Owners Group.

The September 29, 1981 NRC letter requested that plant specific final evaluations be submitted by July 1, 1982. In order to meet that date, evaluations have been initiated. Should initial results from these evaluations indicate that additional time will be needed to adequately address the plant specific configuration, you will be notified on or before July 1, 1982.

II.D.1.3 Block Valve Test Program

The report of the block valve test results is scheduled to be submitted directly to the NRC by Mr. David Hoffman of the EPRI Owners Group by July 1, 1982.

II.K.3.30 & 31 SB LOCA Analysis

Draft copies of WCAP-10054, "Westinghouse Small Break ECCS Evaluation Model using the NOTRUMP Code" and WCAP-10079 "NOTRUMP - a Model Transient Small Break and General Network Code" were submitted directly to the NRC by Westinghouse by April 1, 1982. A plant specific analysis, if necessary, is scheduled to be submitted to NRC one year after staff approval of the model.

III.A.1.2 Staffing Levels for Emergency Situations

As stated in our May 28, 1982 letter (IPN-82-42), although the Authority maintains a policy of immediate call-in of emergency response personnel and can expeditiously implement the required functions of the subject tables, the Authority cannot comply with the rigid time requirement. On March 24, 1982, a partial call-in of emergency personnel took place when an Unusual Event was declared, during off hours, which indicated that many key personnel (including the Superintendent of Power and the Operations Superintendent) were able to respond within 30 minutes. However a survey of plant personnel who would be required to supplement the "on-shift" staff confirmed that it would be impossible to guarantee a 30 minute response time. The average response time of all emergency personnel was forty-one (41) minutes. Our evaluation and current practices demonstrate that the Authority's present staffing levels assure adequate coverage for emergency planning implementation.

Therefore, while the Authority will continue to adhere to immediate call-in of emergency response personnel, during an emergency, it cannot commit to augment the "on-shift" staff within 30 minutes.

III.A.1.2 Upgrade Emergency Support Facilities

The upgraded facilities as described in our June 1, 1981 letter (IPN-81-37) are expected to be complete and operational prior to plant startup from the current refueling outage with the exception of the Data Acquisition System (DAS). As proposed in our December 30, 1981 letter (IPN-81-98), the DAS is not expected to be operational until our cycle 4/5 refueling outage due to rigorous design and quality control requirements and the manufacturing schedules for hardware. However, the Authority understands that the NRC Commissioners are presently considering a revised inplementation schedule for this item under the topic of SECY 82-111, "Requirements for Emergency Response Capabilities." Apparently, Commission action on this document is scheduled for June 1982. The Authority intends to revise the above schedule, as necessary, if Commission action on SECY 82-111 results in a revision of the October 1, 1982 implementation date.

During the period from October 1, 1982 until completion of the upgraded facilities, the control room, TSC and EOF will have access to plant information via CRT terminals linked to the Plant's P-250 computer. This facility is essentially that which was installed in our interim TSC and reviewed by the NRC in June 1980. In addition, a video surveillance system using cameras mounted in the control room, will be able to provide the TSC with information not available on the P-250 computer.

III.A.2.2 Meterological Data

It is the Authority's understanding that the NRC is reappraising the Class B model and that it would become an extension of the Class A model. The Authority will provide an implementation schedule once the NRC Staff establishes final guidance for the Class B or modified Class A model.

III.D.3.4 Control Room Habitability

As proposed in our December 30, 1981 letter (IPN-81-98), the Authority plans to complete this item with the installation of chemical control monitors during the cycle 4/5 refueling outage. This schedule is based on the earliest anticipated delivery of qualified equipment and the availability of manpower.