

123 Main Street
White Plains, New York 10601
914 681.6240



John C. Brons
Senior Vice President
Nuclear Generation

March 27, 1987
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U. S. Nuclear Regulatory Commission
Attn. Document Control Desk
Washington, D. C. 20555

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Comments on NRC Interim Policy Statement
on Technical Specification Improvements
for Nuclear Power Plants

References: 1. U. S. Federal Register, Vol. 52, No. 25 dated
February 25, 1987

Dear Sir:

The New York Power Authority has reviewed the Commission's recently published interim policy statement on technical specification improvements (Reference 1). The Authority's comments focus on two areas: the proposed use of probabilistic risk assessments (PRAs) to determine what should be included or excluded from technical specifications, and the selective implementation of parts of the policy.

Technical specifications should be operator-oriented. Instead of maintaining this goal in sharp focus, they have evolved into a repository for many requirements that have little or nothing to do with the operators' main responsibility - plant safety. The three criteria enumerated in the interim policy provide a sound basis for determining what belongs in the technical specifications. The application of this criteria to

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existing technical specifications would go a long way towards reducing the unnecessary bulk of technical specifications.

The policy statement implies that a fourth criterion exists; a PRA criterion. The Authority considers the three criteria alone adequate to define what regulatory requirements and operating restrictions belong in the technical specifications.

The Authority does not agree that PRAs should be used to determine if a specific requirement should be included in or excluded from operator-oriented technical specifications. Because a PRA has determined that a component contributes to overall risk does not by itself mean that it is directly related to the control room operators responsibilities or that the surveillance frequency needs to be specified in the technical specifications. The policy statement also does not try to define the lower limit of risk for not including a requirement in the technical specifications. The use of PRA as a criterion leaves an open door for the incorporation of unnecessary requirements and operating restrictions in the technical specifications.

There is a place for using PRAs in the technical specification improvement policy. PRAs are tools for gaining insight into the relative risk contributions of structures, systems or components. The NRC's current Standard Technical Specifications were not developed with the use of PRA techniques. Rather, LCOs and AOTs were based on a vague, poorly documented, evaluation of risk. Industry groups have successfully applied PRA techniques to quantitatively justify LCOs, AOTs and surveillance frequencies. The Commission's policy statement should use PRAs where appropriate - not as a catch-all for specifications that are not required by application of the first three criteria.

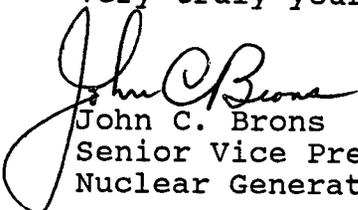
Selective partial implementation of any policy statement on technical specification improvements should be permitted. It may in fact prove to be the preferable means for updating technical specifications. The improvement process could be divided into two parts. The first part would apply the three criteria of the interim policy and relocate these requirements and operating restrictions to other licensee-controlled documents. Part two would apply PRAs, either plant specific or generic, to revising LCOs, AOTs and surveillance frequencies. The first part could be executed at one time, while part two might be selectively applied. In part one, requirements or

operating restrictions would not be altered. The auditability and enforceability of these requirements would not be reduced by their relocation.

The Authority's experience with emergency operating procedures has shown that the application of human factors engineering principals can significantly improve the value and readability of technical documents. The policy statement does not endorse the application of human factors engineering to the format of technical specifications. The Authority considers this point important enough to warrant inclusion.

The Authority is encouraged by the Commission's continued interest in improving technical specifications and will continue to work with industry groups and the NRC towards this goal. Except where noted by comment, the Commission is urged to adopt the subject policy statement as final. Should you or your staff have any questions regarding this matter, please contact Mr. J. A. Gray, Jr. or Mr. P. Kokolakis of my staff.

Very truly yours,


John C. Brons
Senior Vice President
Nuclear Generation

cc: Mr. David C. Fischer
Technical Specifications Coordination Branch
Division of Human Factors Technology
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

U. S. Nuclear Regulatory Commission
Region I
631 Park Ave.
King of Prussia, Pennsylvania 19406

Office of the Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 136
Lycoming, N. Y. 13093

Resident Inspector's Office
Indian Point Unit 3
U. S. Nuclear Regulatory Commission
P. O. Box 215
Buchanan, N. Y. 10511

Mr. Don Neighbors, Senior Project Manager
PWR Project Directorate No. 3
Division of PWR Licensing - A
U. S. Nuclear Regulatory Commission
Bethesda, M. D. 20014

U. S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, M. D. 20014
Attn. Mr. H. Abelson
Mail Stop 416
(To Be Opened By Addressee Only)