

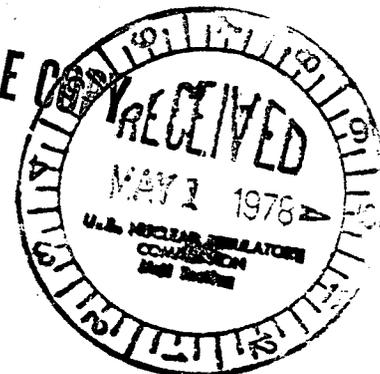
William J. Cahill, Jr.
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N.Y. 10003
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April 24, 1978

Mr. Edson G. Case
Acting Director
Office of the Nuclear
Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

REGULATORY DOCKET FILE COPY



Re: Consolidated Edison Co. of New York, Inc.
(Indian Point Station, Unit Nos. 1 and 2)
Docket Nos. 50-3 and 50-247

Dear Mr. Case:

In accordance with the reporting requirements of Section 5.1.1.5 of the Environmental Technical Specification Requirements (ETSR) for Indian Point Nos. 1 and 2, please be advised that as of March 28, 1978, the following organizational changes became effective relative to implementation of the ETSR:

- The Chief Nuclear and Emissions Control Engineer has been replaced by the Director, Water and Land Use, who will report directly to the Vice President of Environmental Affairs.
- The Nuclear Licensing Engineer shall serve as a member of the Environmental Protection Committee (EPC) in place of the Chief Nuclear and Emissions Control Engineer.
- The nuclear engineering section and the emissions control section have been deleted from the organization chart.
- The Manager of the Nuclear Power Generation Department reports directly to the Vice President of Power Generation, who replaces the Senior Vice President of Power Supply, and who is the company officer in charge of all generating facilities.
- The Senior Engineer, Environmental, Nuclear and Gas Testing Group and the Division Engineer have been replaced by the Division Chemist. The Manager, Operations Services, has been replaced by the General Manager, Power Generation Services.

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Mr. Edson G. Case

April 24, 1978

•The Division Chemist reports via the Chief Chemical Engineer and General Manager, Power Generation Services, to the Vice President of Power Generation, who replaces the Assistant Vice President of Power Generation Operations.

For your information, attached is a revised organization chart (page 5.1-2) and amended pages 5.1-1 and 5.1-3 of the ETSR reflecting these changes.

Very truly yours,



William J. Cahill, Jr.

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cc: George T. Berry (PASNY)

5.0 ADMINISTRATIVE CONTROLS

Objective

To establish the administrative controls that relate to management procedures, recordkeeping and reporting that are considered necessary to provide the assurance and evidence that the plant will be managed as prescribed by the Environmental Technical Specifications and will be operated to provide continuing protection of the environment.

Specifications

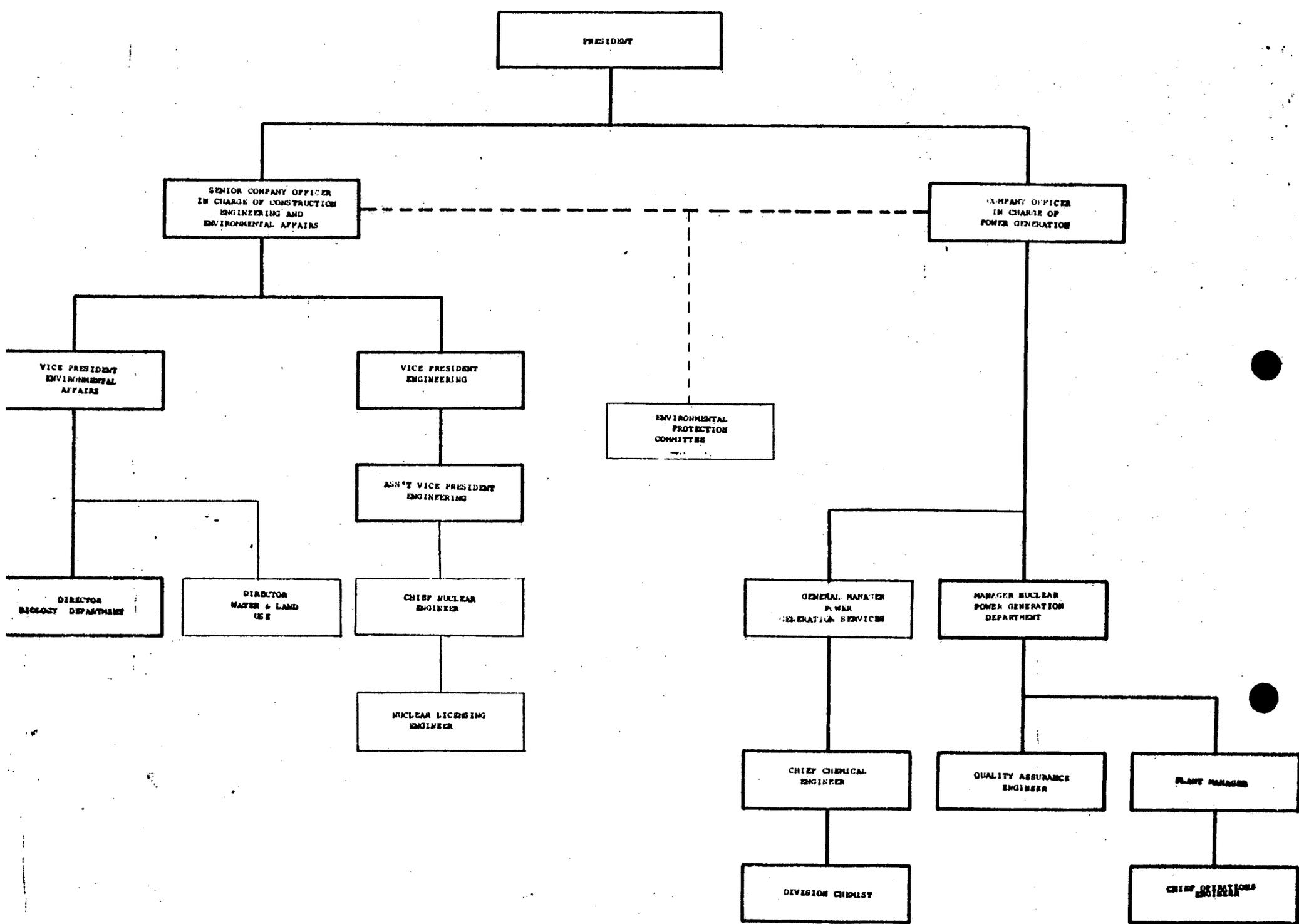
5.1 Organization, Responsibilities, Review and Audits

5.1.1 Organization and Responsibilities

5.1.1.1 The ultimate responsibility for the implementation of the Environmental Technical Specifications shall reside with the corporate officers of Consolidated Edison Company of New York, Inc. The corporate and Station level organization chart is shown in Figure 5.1-1.

5.1.1.2 The Plant Manager shall have direct responsibility for the safe operation and maintenance of all facilities comprising Indian Point Station and to assure that the limiting conditions of operation as noted in the Environmental Technical Specifications as defined herein are not exceeded. This responsibility shall be expressly delegated to a specified member of the Station management staff during any off-duty status period of the Plant Manager. The Chief Operations Engineer, who shall report to the Plant Manager, shall have direct responsibility for the safe operation of all nuclear Units at the Station. The Operations Engineer, who shall report to the Chief Operations Engineer, shall have direct responsibility for the safe operation of his assigned nuclear Unit. The Plant Manager shall report to the Manager of the Nuclear Power Generation Department who reports to the Vice President, Power Generation, who is in charge of all of its generating facilities. See Section 6.1 of Appendix A, Technical Specifications for a detailed description of responsibility of the licensee's facilities.

5.1.1.3 The Division Chemist, shall report via the Chief Chemical Engineer and General Manager, Power Generation Services, to the Vice President, Power Generation and either he, or his designee, has primary responsibility for the conduct of the nuclear environmental monitoring program. The Director, Water and Land Use, and the Director of the Biology Department, both of whom shall report to the Vice President, Environmental Affairs of the Company, have primary responsibility for execution of environmental surveillance studies.



5.1 Specifications (Continued)

The environmental surveillance programs and the special ecological studies will be performed by the licensee's staff and/or through contractual arrangement between the licensee and its contractors.

- 5.1.1.4 The immediate responsibility for the review and updating of each program lies with the Division Chemist, the Director, Water and Land Use and the Director of the Biology Department.
- 5.1.1.5 Any change in the organization and responsibilities described in this Section shall be reported to the Director of Office of Nuclear Reactor Regulation within 30 days and the implementation of any change shall not be deemed a violation of an environmental technical specification.

5.1.2 Review and Audit5.1.2.1 Establishment

An Environmental Protection Committee (EPC) shall be constituted to advise the Chairman, the President, the Senior Vice President, Construction, Engineering and Environmental Affairs, and Vice President, Power Generation (or equivalent senior management of the Company), concerning environmental aspects of nuclear power facilities. The EPC will have the responsibility of performing the independent review and audit of the nonradiological environmental monitoring, surveillance and special studies program as presented in Section 5.1.2.7. A charter, describing the EPC functions and responsibilities shall be on file for inspections. The Nuclear Facility Safety Committee (NFSC) as described in Section 6 of Appendix A shall have the responsibility to perform the review and audit of the radiological environmental monitoring program.

5.1.2.2 Composition

- a. The Committee (EPC) shall have membership of at least ten (10) persons, including the Division Chemist, the Director of the Biology Department, The Nuclear Licensing Engineer, or their designees. The remaining members shall include technically competent persons from all departments of Consolidated Edison having an interest in environmental effects or their control as related to facility design or operation and shall be appointed by their respective Vice President in accordance with the Committee's charter.

The Chairman and Vice Chairman shall be officers of the Company experienced in fields related to environmental effects or their control.

The Chairman of the EPC Committee, hereafter referred to as the Chairman, shall be appointed by the Chairman of the Board or the President of the Company.