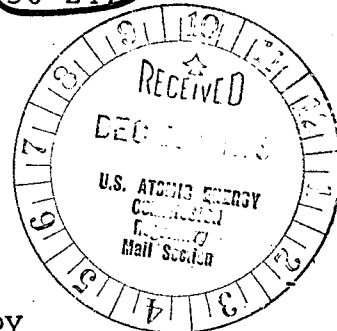


Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N. Y. 10003  
Telephone (212) 460-5133

December 6, 1973

RE: Indian Point Units 1 and 2  
Docket No. 50-3, 50-247

Mr. A. Giambusso  
Deputy Director of Reactor Projects  
Directorate of Licensing  
U.S. Atomic Energy Commission  
Washington, D.C. 10545



Dear Mr. Giambusso:

Consolidated Edison Company of New York, Inc., hereby requests Change No. 2 to the Environmental Technical Specification Requirements for Once Through Cooling, Appendix B to Facility Operating License DPR-26 dated August 9, 1973. The specific change requested in Sections 5.1 is set forth in Attachment I. A revised page 5-1 is also attached.

The Environmental Protection Committee has reviewed the proposed change to the Environmental Technical Specification Requirements and has concluded that the proposed change, being administrative in nature, will have no environmental impact, adverse or otherwise. The proposed change has been concurred with by the Chairman of the Nuclear Facilities Safety Committee. (Concurrence memo found as Attachment II.)

Three (3) originals and nineteen (19) copies of this request are provided for your use.

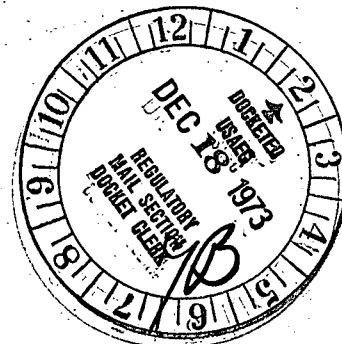
Very truly yours,

A handwritten signature in cursive script that reads "Carl L. Newman".

Carl L. Newman  
Vice President

RJN/hk  
cc:

John F. O'Leary (w/enclosure)  
James P. O'Reilly (w/enclosure)



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Proposed ETS Change No. 2

On page 5-1 of the Environmental Technical Specification (ETS) (Appendix B), and subsection 5.1B, the Environmental Protection Committee (EPC) is established, its minimum number of members defined and its principal responsibilities stated. These responsibilities are the review and audit of the nonradiological environmental monitoring, surveillance, and special studies.

It is also stated that the Nuclear Facilities Safety Committee (NFSC) shall have the responsibilities to perform the review and audit of the radiological monitoring program. This breakdown of responsibilities seems to assign parallel duties to two separate committees. Item 5.1.B.1 on page 5-2 of the ETS states that the EPC will coordinate environmental technical specification development with the NFSC to avoid conflicts and maintain consistency. No other mention of the NFSC is made in the section.

It is not clear in the ETS if it was the intent of the AEC that the EPC should report to the NFSC directly in the manner of other NFSC subcommittees, or act independently. In addition, the clear-cut duties of the EPC stated in the ETS require, on certain instances, reporting directly to Company officials, prior to AEC notification, without mention of the NFSC.

It is believed that the duties of the EPC can best be carried out if the uncertainties regarding the Committee's reporting duties are made clear by establishing the Environmental Protection Committee as a separate committee, independent of the NFSC. This would permit the EPC to carry out its duties more efficiently by allowing for faster implementation of Committee recommendations and more direct contact between the Indian Point plant, the Committee, and the Atomic

Energy Commission environmental matters. would also relieve the NFSC of having to review the matters already acted upon by the EPC.

For these reasons, it is requested that on Section 5.1.B the first sentence be modified to read: "An Environmental Protection Committee (EPC) shall be constituted and shall include, but not be limited to, the Manager - Nuclear Services, the Chief Mechanical Engineer, and the Director of the Biology Department or their designees."

Con  
Edison

## memorandum

November 20, 1973

TO: John T. Conway - Chairman  
Nuclear Facilities Safety Committee

FROM: Carl L. Newman - Chairman  
Environmental Protection Committee *C. L. Newman*

SUBJECT: Environmental Protection Committee

As discussed previously with Mr. William P. Cahill the Environmental Protection Committee (EPC) will request the Atomic Energy Commission to change the Environmental Technical Specifications (Appendix B) to make the EPC independent of the Nuclear Safety Committee, as approved by the EPC in its meeting of November 9, 1973.

Your concurrence with this proposed change and with the attached request to the AEC is requested.

CONCURRENCE:

*John T. Conway*  
John T. Conway-Chairman  
Nuclear Facilities Safety  
Committee

rjn/hk  
Attachment  
cc:

W.P. Cahill  
J.J. Szeligowski

### Objective

To describe the administrative controls that relate to management procedures, record keeping 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.

### Specifications

#### 5.1 Organization, Review and Audit

##### A. Organization

1. The Station Manager has onsite responsibility for the safe operation of the facility and to assure that the limits as noted in the environmental technical specifications as defined herein are not exceeded.
2. The Station Manager shall report to the Manager of the Nuclear Power Generation Department who reports to the Vice President of Power Supply. See Figure 6.1-1 of Appendix A (Radiological Technical Specifications) for a detailed description of responsibility.
3. The Manager - Nuclear Services, or appropriate designee has primary responsibility for the station environmental monitoring. The Chief Mechanical Engineer and the Director of the Biology Department have primary responsibility for execution of special environmental studies.

##### B. Review and Audit

An Environmental Protection Committee (EPC) shall be constituted and shall include but not be limited to, the Manager - Nuclear Services, the Chief Mechanical Engineer and the Director of the Biology Department or their designees. The EPC shall have the responsibility of performing the review and audit of the non-radiological environmental monitoring, surveillance, and special studies programs. The Nuclear Facilities Safety Committee (NFSC) shall have the responsibility to perform the review and audit of the radiological monitoring program.

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