

AMENDMENT I

PROPOSED CHANGES TO SECTION 6.0, ADMINISTRATIVE CONTROLS,
OF APPENDIX A OF FACILITY OPERATING LICENSE DPR-64,
TECHNICAL SPECIFICATIONS

Power Authority of the State of New York
February, 1978

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1. Provide revised Technical Specifications on Administrative Controls for the submittal of monthly reports which are consistent with those proposed by Consolidated Edison for IP3.

Response

The attached TS 6.0 constitutes a revised version of the Power Authority's submittal, dated October 27, 1977 (IPO-29), which incorporates the following changes:

- a. Changes transmitted in the Power Authority's submittal dated December 20, 1977 (IPO-40).
- b. Changes to sections 6.8 and 6.9 as requested by NRC staff.
- c. Changes to Figure 6.2-2 and section 6.12 as requested by NRC during the inspection of January 9-13, 1978.
- d. Changes to section 6.2 for clarification of plant staff requirements for safe shutdown.
- e. Changes to section 6.5 for clarification of membership requirements of the Safety Review Committee in a manner consistent with present Con Ed Technical Specifications.

Modifications are indicated by vertical lines along the right hand side of the page, dates are given of when the modification was requested.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Resident Manager shall be responsible for overall facility operation. During periods when the Resident Manager is unavailable, the Superintendent of Power will assume his responsibilities. In the event both are unavailable, the Resident Manager may delegate this responsibility to other qualified supervisory personnel.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for plant management and technical support shall be as shown on Figure 6.2-1.

PLANT STAFF

6.2.2 The plant organization shall be as shown on Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one Licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. ALL CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A Fire Brigade of at least five members shall be maintained on site at all times. This excludes five members of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency.

GENERAL MANAGER
AND
CHIEF ENGINEER

SAFETY
REVIEW
COMMITTEE

ASSISTANT
GENERAL MANAGER
ENGINEERING

DIRECTOR OF
POWER
OPERATIONS

ASSISTANT CHIEF
ENGINEER
STAFF

ASSISTANT CHIEF
ENGINEER
PROJECTS

ASSISTANT CHIEF
ENGINEER
CONSTRUCTION

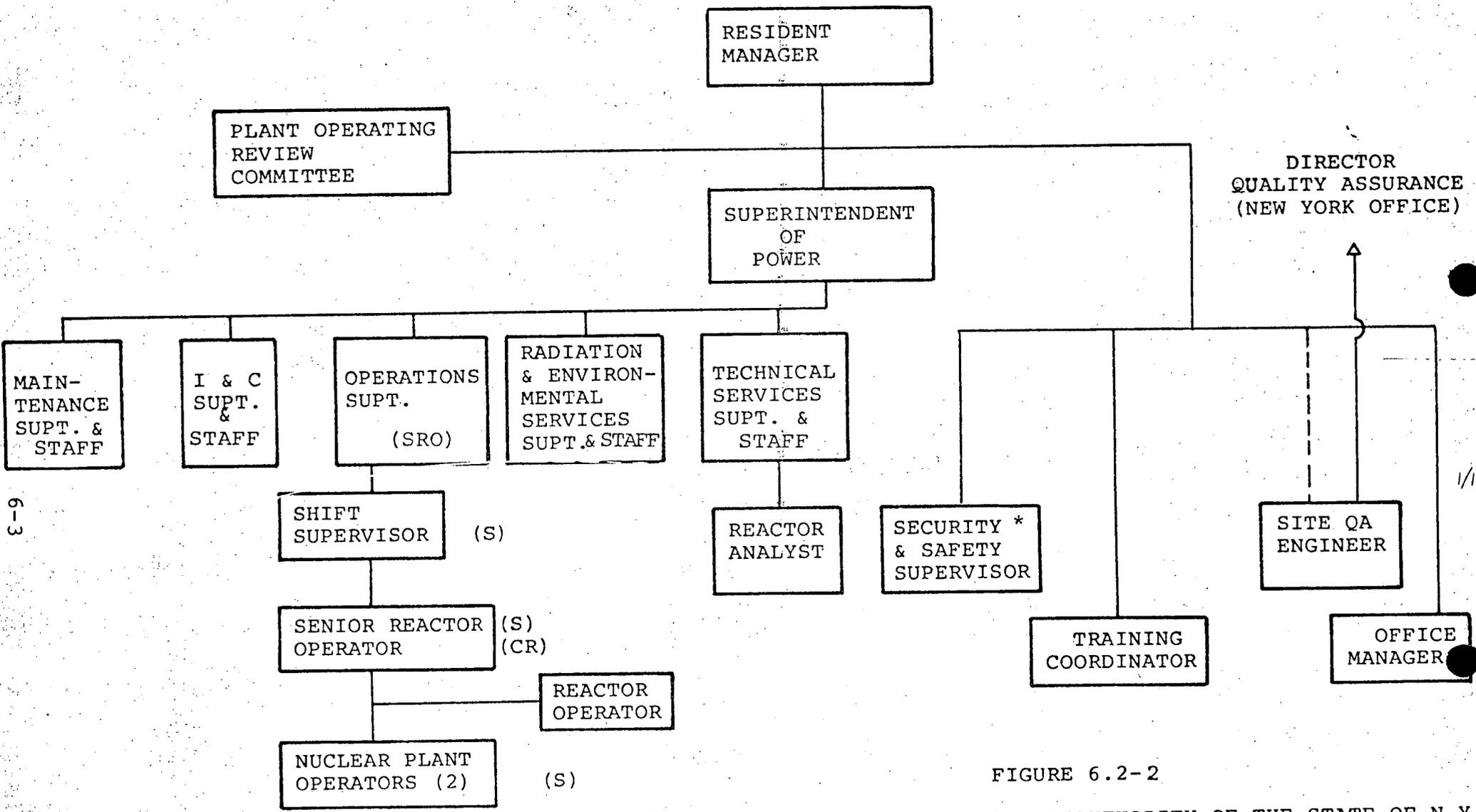
DIRECTOR OF
ENVIRONMENTAL
PROGRAMS

MANAGER
NUCLEAR
OPERATIONS

RESIDENT
MANAGER

———— ADMINISTRATIVE
----- FUNCTIONAL

FIGURE 6.2-1
MANAGEMENT ORGANIZATION CHART
INDIAN POINT 3 NUCLEAR POWER PLANT



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FIGURE 6.2-2

POWER AUTHORITY OF THE STATE OF N.Y.
 INDIAN POINT NUCLEAR POWER PLANT
 PLANT STAFF ORGANIZATION

(S) Continuous Coverage
 (CR) Control Room
 (SRO) Senior Reactor Operator
 * Responsible for Fire Protection Program

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Table 6.2-1

Minimum Shift Crew Composition *

License Category	During Operations Involving Core Alterations	During Cold Shutdown or Refueling Periods	At All Other Times
Senior Operator License	2**	1	1
Operator License	1	1	2
Non-Licensed	(As Required)	1	2

* Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of this Table.

** Includes individual with SRO license supervising fuel movement as per Section 6.2.2e.

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6.3 PLANT STAFF QUALIFICATIONS

6.3.1 Each member of the plant staff shown in Fig. 6.2-2 shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiation and Environmental Services Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the training coordinator and shall meet or exceed the requirements and recommendations of Section 5.5 or ANSI N18.1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Training Coordinator and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976 with the exception of the training program schedule.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATING REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The Plant Operating Review Committee shall function to advise the Resident Manager on all matters related to nuclear safety and all matters which could adversely change the plants environmental impact.

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COMPOSITION

6.5.1.2 The Plant Operating Review Committee shall be composed of the:

Chairman:	Resident Manager
Vice-Chairman:	Superintendent of Power
Member:	Operating Superintendent
Member:	Technical Services Superintendent
Member:	Maintenance Superintendent
Member:	Instrument & Control Superintendent
Member:	Radiological and Environmental Services Superintendent

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the (PORC) Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in (PORC) activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 A quorum of the PORC shall consist of the Chairman or Vice-Chairman and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The Plant Operating Review Committee shall be responsible for:

- a. Review of 1) all procedures affecting nuclear safety required by Specification 6.8 and changes thereto, 2) Any other proposed procedures or changes thereto as determined by the Resident Manager to affect Nuclear Safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.

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- c. Review of all proposed changes to the Operating License and Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Resident Manager, who will forward the report to the Chairman of the Safety Review Committee and Manager-Nuclear Operations.
- f. Review of events requiring 24 hour notification to the commission.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Resident Manager or the Chairman of the Safety Review Committee (SRC).
- i. Review of the Plant Security Plan and implementing procedures annually and shall submit recommended changes to the Chairman of the SRC.
- j. Review of the Emergency Plan and implementing procedures annually and shall submit recommended changes to the Chairman of the SRC.

AUTHORITY

6.5.1.7 The Plant Operating Review Committee shall:

- a. Recommend to the Resident Manager approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question, as defined in 10 CFR 50.59.
- c. Provide notification within 24 hours to the Chairman of the SRC and the manager of Nuclear Operations of disagreement between the PORC and the Resident Manager; however the Resident Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Operating Review Committee shall maintain minutes of each meeting and copies shall be provided to the Chairman of the SRC and Manager-Nuclear Operations.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

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FUNCTION

6.5.2.1 The SRC shall collectively have the competence required to review problems in the following areas:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Environment
- k. Civil/Structural Engineering
- l. Other appropriate fields associated with the unique characteristics of a nuclear power plant.

MEMBERSHIP

6.5.2.2 The SRC shall be composed of the following voting members:

- | | |
|----------------|---|
| Chairman: | Principal Nuclear Engineer - Staff |
| Vice-Chairman: | Director - Quality Assurance |
| Member: | Principal Nuclear Engineer - Projects |
| Member: | Radiological Engineer |
| Member: | Manager - Nuclear Operations |
| Member: | Principal Electrical Engineer - Staff |
| Member: | Director of Environmental Programs |
| Member: | Principal Civil/Structural Engineer |
| Member: | Principal Mechanical Engineer - Staff |
| Member: | Nuclear Engineer - Staff (Secretary of SRC) |

ALTERNATES

6.5.2.3 All alternates members shall be appointed in writing by the SRC Chairman; however, no more than two alternates shall participate as voting members in SRC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

MEETING FREQUENCY

6.5.2.5 The SRC shall meet at least once per calendar quarter during the initial year of facility operation following initial fuel loading and at least once per six months, thereafter.

QUORUM

6.5.2.6 A quorum of SRC shall consist of the Chairman or Vice-Chairman and four members, including alternates. No more than minority of the quorum shall have a direct line responsibility for the operation of the plant.

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REVIEW

6.5.2.7 The SRC shall review:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications of this Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. Events requiring 24 hour written notification to the Commission.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meetings minutes of the Plant Operating Review Committee.
- j. The facility Fire Protection Program and implementing procedures at least once per two years.

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AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the SRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 24 months.
- f. The Facility Security Plan and implementing procedures at least once per 24 months.
- g. Any other area of facility operation considered appropriate by the SRC or the General Manager and Chief Engineer.
- h. The Facility Fire Protection Program and implementing procedures at least once per two years.
- i. A fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

AUTHORITY

6.5.2.9 The SRC shall report to and advise the General Manager and Chief Engineer on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records will be maintained in accordance with ANSI 18.7-1972. The following shall be prepared, approved and distributed as indicated below:

- a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the General Manager & Chief Engineer within 14 days after the date of the meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the General Manager & Chief Engineer within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the General Manager & Chief Engineer and to the management positions responsible for the areas audited within 30 days after completion of the audit.

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CHARTER

6.5.2.11 Conduct of the committee will be in accordance with a charter, approved by the General Manger and Chief Engineer setting forth the mechanism for implementation of the committee's responsibilities and authority.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
- b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the PORC and a report submitted by the Resident Manager to the Chairman of the SRC and Manager-Nuclear Operations.

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6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36(c) (1) (i).
- b. The Safety Limit violation shall be reported immediately to the Commission by the Resident Manager. The Chairman of the SRC and Manager-Nuclear Operations will be notified within 24 hours.

- c. A Safety Limit Violation Report shall be prepared by the PORC. This report shall describe (1) applicable circumstances preceding the occurrence, (2) effects of the occurrence upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Chairman of the SRC and the Manager-Nuclear Operations by the Resident Manager.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.

6.8.2 Temporary changes to procedures above may be made provided:

- a. The intent of the original procedures is not altered.
- b. The change is approved by two members of the plant staff, at least one of whom holds a Senior Reactor Operator's license on the unit affected.
- c. The change is documented, reviewed by the PORC and approved by the Resident Manager within 14 days of implementation.

6.8.3 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the PORC and approved by the Resident Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

6.9 REPORTING REQUIREMENT

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Regional Office of Inspection and Enforcement unless otherwise noted.

STARTUP REPORT

6.9.1.1 A summary report of appropriate plant testing shall be submitted following (1) an amendment to the license involving a planned increase in power level, (2) installation of fuel that has a different design and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performances of the plant. The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the testing and a comparison of these values with acceptance criteria. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.2 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL RADIATION EXPOSURE REPORTS

6.9.1.3 A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposures according to work and job functions, 1/ e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

MONTHLY OPERATING REPORT

6.9.1.4 Routine reports of operating statistics, operating and shutdown experience and safety-related maintenance shall be submitted on a monthly basis to the Director of the Region I Office of Inspection and Enforcement, with 40 copies to the Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, no later than 15 days following the calendar month covered by the report.

1/ This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

6.9.1.5 Each monthly operating report shall include:

- a. A tabulation of plant operating data and statistics.
- b. A narrative summary of operating experience during the report period relating to safe operation of the facility, including safety-related maintenance not covered in 6.9.1.5.c.5 below.^{2/}
- c. For each outage or forced reduction in power^{3/} of over twenty percent of RATED POWER where the reduction extends for greater than four hours:
 1. The proximate cause and the system and major component involved (if the outage or forced reduction in power involved equipment malfunction);
 2. A brief discussion of (or reference to reports of) any reportable occurrences pertaining to the outage or power reduction;
 3. Corrective action taken to reduce the probability of recurrence, if appropriate;
 4. Operating time lost as a result of the outage or power reduction (for scheduled or forced outages,^{4/} use the generator off-line hours; for forced reductions in power, use the approximate duration of operation at reduced power);
 5. A description of major safety-related corrective maintenance performed during the outage or power reduction, including the system and component involved and identification of the critical path activity dictating the length of the outage or power reduction; and
 6. A report of any single release of radioactivity or radiation exposure specifically associated with the outage which accounts for more than 10% of the allowable annual values.

^{2/}Any safety-related maintenance information not available for inclusion in the monthly operating report for a report period shall be included in a subsequent monthly operating report not later than 6 months following completion of such maintenance.

^{3/}The term "forced reduction in power" is defined as the occurrence of a component failure or other condition which requires that the load on the unit be reduced for corrective action immediately or up to and including the very next weekend. Note that routine preventive maintenance, surveillance and calibration activities requiring power reductions are not covered by this section.

^{4/}The term "forced outage" is defined as the occurrence of a component failure or other condition which requires that the unit be removed from service for corrective action immediately or up to and including the very next weekend.

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6.9.1.6 Pursuant to 10 CFR 50.59, a description of facility changes, tests and experiments effected pursuant to 10 CFR 50.59(a), including a summary of the safety evaluation of each, must be provided to the Commission. Such a description may be included in a monthly operating report and shall be submitted no later than one year following completion of such a change.

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REPORTABLE OCCURRENCES

6.9.1.7 The REPORTABLE OCCURRENCES of Specifications 6.9.1.8 and 6.9.1.9 below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

PROMPT NOTIFICATION WITH WRITTEN FOLLOWUP

6.9.1.8 The types of events listed below shall be reported within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the Regional Office, or his designate no later than the first working day following the event, with a written followup report within two weeks. The written followup report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Failure of the reactor protection system or other systems subject to limiting safety system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint specified as the limiting safety system setting in the technical specifications or failure to complete the required protective function.
- b. Operation of the unit or affected system when any parameter or operation subject to a limiting condition for operation is less conservative than the least conservative aspect of the limiting condition for operation established in the technical specifications.
- c. Abnormal degradation discovered in fuel cladding, reactor coolant pressure boundary, or primary containment.
- d. Reactivity anomalies involving disagreement with the predicted value of reactivity balance under steady conditions during power operation greater than or equal to $1\% \Delta k/k$; a calculated reactivity balance indicating a SHUTDOWN MARGIN less conservative than specified in the technical specifications; short-term reactivity increases that correspond to a reactor period of less than 5 seconds or, if subcritical, an unplanned reactivity insertion of more than $0.5\% \Delta k/k$; or occurrence of any unplanned criticality.

- e. Failure or malfunction of one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems(s) used to cope with accidents analyzed in the SAR.
- f. Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.
- g. Conditions arising from natural or man-made events that, as a direct result of the event require plant shutdown, operation of safety systems, or other protective measures required by technical specifications.
- h. Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the safety analysis report or in the bases for the technical specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses.
- i. Performance of structures, systems, or components that requires remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or technical specifications bases; or discovery during plant life of conditions not specifically considered in the safety analysis report or technical specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition.

THIRTY DAY WRITTEN REPORTS

6.9.1.7 The types of events listed below shall be the subject of written reports to the Director of the Regional Office within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems.
- b. Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.

- c. Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.
- d. Abnormal degradation of systems other than those specified in 6.9.1.8.c above designed to contain radioactive material resulting from the fission process.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Director of the Office of Inspection and Enforcement Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. Sealed source leakage on excess of limits (Specification 3.9)
- b. Inoperable Seismic Monitoring Instrumentation, (Specification 4.10)
- c. Primary coolant activity in excess of limits (Specification 3.1.D)
- d. Seismic event analysis (Specification 4.10)
- e. Inoperable fire protection and detection equipment (Specification 3.14)

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for a least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE OCCURRENCES submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to Operating Procedures.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all source material of record.
- i. Records of reactor tests and experiments.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Records of any drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transient cycles.
- g. Records of training and qualifications for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of QA Activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PORC and the SRC.

6.11 RADIATION AND RESPIRATORY PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure as to maintain exposures as far below the limits specified in 10 CFR Part 20 as reasonable achievable. Pursuant to 10 CFR 20.103 allowance shall be made for the use of respiratory protective equipment in conjunction with activities authorized by the operating license for this plant in determining whether individuals in restricted areas are exposed to concentrations in excess of the limits specified in Appendix B, Table I, Column 1 of 10 CFR 20.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR 20, each high radiation area in which the intensity of radiation is 1000 mrem/hr or less and 100 mrem/hr or greater shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/yr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the plant Radiological and Environmental Superintendent or his designee.

* Health Physics Personnel shall be exempt from the RWP issuance requirements for entries into high radiation areas during the performances of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

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AMENDMENT II

PROPOSED CHANGES TO SECTION 5.0, ADMINISTRATIVE CONTROLS,
OF APPENDIX B OF FACILITY OPERATING LICENSE DPR-64,
ENVIRONMENTAL TECHNICAL SPECIFICATIONS

Power Authority of the State of New York
February, 1978

- a. Review results of environmental monitoring programs prior to submittal in each annual environmental monitoring report.
- b. Review proposed changes to the Environmental Technical Specifications and the evaluated impact of the change.
- c. Review proposed changes or modifications to the plant systems or equipment and the evaluated impact which would adversely affect the evaluation of the plant's environmental impact.
- d. Review the Environmental Technical Specification development with the Safety Technical Specifications to avoid conflicts and for consistency.
- e. Review all proposed procedures or changes thereto which pertain to these ETS requirements.
- f. Review all reported violations of Environmental Technical Specifications. Where review warrants, prepare and forward a report covering their evaluation and recommendation to prevent recurrence to the Resident Manager and the Chairman of the Safety Review Committee.

5.3.3 The Plant Operating Review Committee will make tentative determination as to whether or not proposals submitted to the committee involve a change in the plant's environmental impact. This determination is subject to review by the Safety Review Committee.

5.4 REVIEW AND AUDIT BY SAFETY REVIEW COMMITTEE (SRC)

5.4.1 Review and audit of environmental matters by the SRC shall be as described below and in Section 6.5.2 of Appendix A.

5.4.2 The responsibilities of the Safety Review Committee as related to the Environmental Technical Specifications are as follows:

- a. Review proposed changes and/or modifications to procedures, equipment or systems which adversely affect the plant's environmental impact.
- b. Review proposed tests and experiments which adversely affect the plant's environmental impact.

- c. Review proposed changes in the Operating License and Technical Specifications relating to environmental concerns.
- d. Make or cause to be made periodic audits of plant operation to verify conformance with the Environmental Technical Specification.
- e. Review violations of the Environmental Technical Specifications.

5.5 PROCEDURES

5.5.1 Detailed written procedures, including applicable checklists and instructions, shall be prepared and followed for all activities involved in carrying out the environmental monitoring program. Procedures include sampling, data recording and storage, instrument calibration, measurements and analyses, and actions to be taken when limits are approached or exceeded. Testing frequency of alarms, as determined from experience with similar instruments in similar environments and from manufacturers' technical manuals, have also been included. 1
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5.5.2 Plant Operating Procedures include provisions, in addition to the procedures specified in Section 5.5.1, to ensure that all plant systems and components are operated in compliance with the limiting conditions for operations established as part of the Environmental Technical Specifications.

5.6 PLANT REPORTING REQUIREMENTS

5.6.1 Routine Reports

- a. Annual Environmental Operating Report

Part A: Nonradiological Report. A report on the environmental surveillance programs for the previous 12 months of operation shall be submitted to the Director of the NRC Regional Office (with a copy to the Director, Office of Nuclear Reactor Regulation) as a separate document within 120 days after January 1 of each year. The report shall include summaries, interpretations, and statistical evaluation of the results of the nonradiological environmental surveillance activities (Section 3) and the environmental monitoring programs required by limiting conditions for operation (Section 2) for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous environmental surveillance

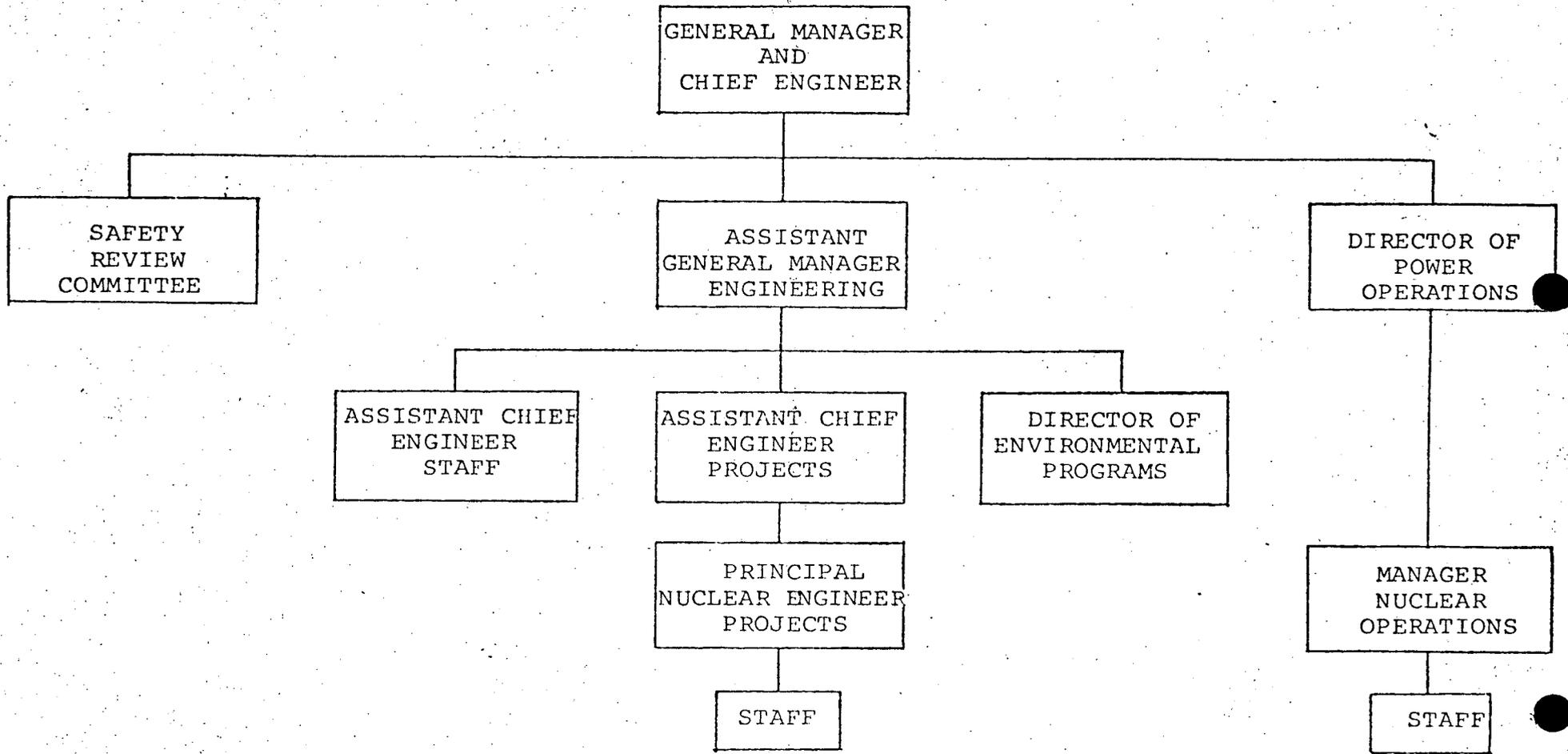


FIGURE 5.2 - 2
 MANAGEMENT ORGANIZATION
 ENVIRONMENTAL
 INDIAN POINT 3 NUCLEAR POWER PLANT