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Joseph Murphy, Reactor Projects Branch #1
Division of Reactor Licensing

Original Signed by
THRU: Dudley Thompson, Chief Dudley Thompson
Operational Safety Branch, DRL

SUPPLEMENT NO. 5 - CONSOLIDATED EDISON COMPANY OF NEW YORK, INDIAN POINT NO. 3, DOCKET NO. 50-286

Ref: Memo, R. A. Birkel to J. A. Murphy, dated October 3, 1968.

Attachment B of the reference memorandum indicated specific areas that should be included within a PSAR. The following comments indicate the extent to which the applicant has provided this information.

1. Organization and Responsibilities

   a. Company Engineering Staff - additional information required; area not discussed by applicant.

   b. Station Staff - generally considered adequate; applicant is, however, requested to indicate total station (3 units) personnel with appropriate breakdown.

   c. Interrelationships - Utility, Vendor(s), A. E., Contractors, Consultants - additional information is required.

2. Position Minimum Requirements

   a. Station Staff

      1. General Superintendent - adequate

      2. Generation Superintendent - adequate; will he hold an SRO license for I. P. #3 as well as I. P. #1 and 2?

      3. Reactor Engineer - probably adequate; will he have a minimum of ten years experience related to nuclear design, analytical or engineering effort at nuclear power plants, reactor vendor's or nuclear consultants' organization or similar facilities; will he have at least one year of training at the facility prior to assuming his permanent duties; will he have an SRO license for I. P. #3 as well as I. P. #1 and 2?

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4. Assistant to Generation Superintendent - no information presented.

5. Performance Superintendent - inadequate information; will he have a minimum of ten years experience in the nuclear field and have demonstrated his proficiency in reactor core design and analysis, heat transfer and fluid flow, instrumentation and control, coolant chemistry, and radiation protection engineering?

6. Test Engineer (Health Physicist) - generally adequate; in matters relating to and involving radiation or personnel safety, he should have direct access to the General Superintendent; since he is also responsible for I. & C., what qualifications does he possess to satisfactorily implement this responsibility?

7. Maintenance Supervisor - qualifications appear vague and marginal; we consider ten years experience in mechanical or electrical preventative and corrective maintenance programs at nuclear or fossil-fuel power plants, heavy industry or similar facilities as adequate.

8. Instrumentation and Control Supervisor - adequate; position not shown on organization chart; position should be included to identify organizational responsibility.

9. Chemistry Supervisor - experience is inadequate for responsibilities and requirements for a three-reactor facility; adequate experience would be seven years of related design, analytical or industrial engineering work at a nuclear or fossil-fuel power plant, chemical processing facility or in quality assurance programs requiring chemical controls; he must have demonstrated proficiency in laboratory techniques for the analysis of coolant quality at nuclear facility and in corrective measures required to deal with abnormal conditions.

10. Shift Supervisor - no information available.

11. Prod. Engr. (Effic.) - no information available.

12. Prod. Engr. (Train.) - no information available.

13. Heal. Phy. Supv. - no information available.

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b. Operating Crew

Applicant's response requires elaboration. How many shift crews for I. P. #3; composition of each; function from single or combined control room; SRO's and RO's available on shift for I. P. #3?

Interaction with I. P. #1 and #2 not discussed. Applicant should indicate crew size, composition, operator license requirements, control room assignments, etc., for I. P. #1 and #2; indicate responsibilities and authorities of each crew as well as possible transfer of crew mwmbers between reactors. What provisions will be made for operator relief assignments, e.g., illness, vacations, jury duty, etc.? Will each shift crew have a chemist and a health physics technician?

3. Training

a. Station Initial Staff

Applicant's response requires elaboration. What means will be provided to prevent degradation of I. P. #1 and #2 staff and operating force? Since I. P. #2 staff will be assigned (1970) to I. P. #3, one year before fuel loading (1971), replacement personnel should already be in training. Applicant is requested to discuss his entire training program for I. P. #2 and #3 indicating numbers of people, job categories, time table and schedule, assignments to facilities, etc.

b. Replacement Personnel

No information available.

c. Interrelationships - other nuclear facilities

Inadequate information is available.

4. Testing

Adequate information is presented.

5. Technical Specifications

No information is available.

6. Operating Procedures

Adequate information is available.

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7. Administrative Control

a. Plant Safety; Review and Audit

The applicant proposes the use of a single off-site review and audit committee - the Nuclear Facility Safety Committee; plant safety would be reviewed by the General Superintendent of the Indian Point Station. This arrangement is not acceptable since it does not provide adequate in-depth continuous safety review of station operation.

We strongly recommend that the applicant consider the establishment of an I. P. Station Safety Review Committee consisting of (as a minimum) the General Superintendent, Reactor Engineer, Generation Superintendent, Performance Superintendent, and Technical Staff engineers. The IPSSRC would be responsible for:

(1) Review of all station and initial revised procedures covering normal and emergency situations.

(2) Continuing analysis of station operations to detect potential safety problems.

(3) Recommend technical specification modifications.

(4) Analyze and submit reports to the Nuclear Facility Safety Committee when a technical specification violation occurs.

(5) Recommend and approve design changes and request technical assistance as needed to implement changes.

(6) Review effect of design changes on technical specification requirements. Recommend modifications if needed.

The IPSSRC would submit reports, recommendations, technical specification changes, etc., to the NFSC for final action, where appropriate.

Regarding the NFSC, to whom does the committee report; what constitutes a quorum; what records, such as meeting minutes, are prepared, distributed, etc.; what provisions are made for outside consultants; what are frequency of meetings?

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b. Personnel Radiation Exposure

No information is available.

8. Plant Operation Records

Adequate information is presented.

9. Emergency Planning

Adequate information is presented.

10. Medical Preparedness

Adequate information is presented.

/s/ Ralph A. Birkel
Operational Safety Branch
Division of Reactor Licensing

cc: D. J. Skovholt, AD/RO DRL
D. R. Muller, Chief, RPE#1/DRL

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