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R. C. DeYoung, Assistant Director for PWR's, L

RESPONSE TO STANDARD REVIEW ASSIGNMENT - INDIAN POINT STATION UNIT 3,
CONSOLIDATED EDISON OF NEW YORK, REVIEW OF FSAR CHAPTERS 12 & 13

Plant Name: Indian Point Unit 3
Licensing Stage: OL
Docket No.: 50-286
Branch & Project Manager Requesting Assistance: L:PWR-1, H. Specter
Technical Review Branch Involved: L:OSB
Description of Review: Review of FSAR Chapters 12 & 13
Requested Completion Date: 5/1/73
Review Status: SER Input Complete

The attached report contains draft input for the Safety Evaluation Report relative to our review of the subject FSAR. We consider our review has been completed except for the items listed below. These items have been discussed with the applicant and we consider that we have reached agreement, but documentation, as reflected by revision to the FSAR, has not been completed. We do not expect the applicant's submittal covering these items will raise new issues, but of course must review them when they are formally submitted.

1. The applicant will provide additional information relative to his Industrial Security Plans; (a) clarifying fence lines and access passages and control into Unit No. 3 vital areas, and (b) revising his key control system.
2. The applicant will provide additional information relative to his Radiation Contingency Plans; (a) providing a letter of agreement from the U.S. Coast Guard, (b) providing a description of his means for control of nearby railroad traffic, if necessary, and (c) providing a description of

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his means for determining the magnitude of a radiological incident from installed plant instrumentation and the use of this information relative to notification and participation of outside assistance.

W Victor Stello, Jr., Assistant Director
for Reactor Safety
Directorate of Licensing

Enclosure:
As stated

cc w/encl:
J. M. Hendrie, L:TR
S. H. Hanauer, DRTA
D. Vassallo, L:PWR-1
H. Specter, L:PWR-1
R. W. Houston, L:OSB
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cc w/o encl:
W. McDonald, L:OPS

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DATE ▶	5/3/73	5/4/73	5/ /73			

Draft Input for Safety Evaluation Report
Consolidated Edison of New York
Indian Point Unit No. 3
Docket No. 50-286

13.0 Conduct of Operations

13.1 Plant Organization and Staff Qualifications

The Indian Point Station staff, Nuclear Units 1, 2 & 3, will consist of approximately 380 full time employees. The station is under the on-site supervision of the Manager, Nuclear Power Generation Department who reports to the Assistant Vice President, Power Generation Department who in turn reports through the Vice President, Power Supply to the Executive Vice President, Central Operations. The Manager of the Nuclear Power Generation Department has the general responsibility for administering all phases of operation, training and maintenance of the facility. Under the Manager of the Nuclear Generation Department the organization is functionally divided into Operation and Maintenance under the Station Manager for Operation and Maintenance, and Nuclear Services under the Manager, Nuclear Services.

The Station Manager for Operation and Maintenance has reporting to him a Plant Engineer with a staff of approximately 135 persons, responsible for planning and implementing preventive and corrective maintenance, and three Chief Engineers. Each Chief Engineer is responsible for administering all phases of operation for one of the nuclear generation units and has an Operational Engineer reporting to him who is responsible for the day to day operation of his unit. The Chief Engineer for Unit No. 3 has a staff of approximately 40 persons.

A General Watch Engineer, licensed as a Senior Reactor Operator for one of the units, is responsible for facility operation on a shift to shift basis. He reports to the Station Manager for Operation and Maintenance. Completing the proposed shift complement for Unit 3 is a Watch Foreman reporting to Operational Engineer for Unit No. 3, licensed as a Senior Reactor Operator, a Senior Reactor Operator and Reactor Operator, licensed as Reactor Operators and three Nuclear Plant Operators. In addition a Health Physics Technician is assigned to each shift as a shared function for all three units.

The Manager, Nuclear Services, is responsible for providing the staff services of training, technical engineering and radiation safety and controls. He has reporting to him a Director Nuclear Training with a staff of approximately 12 persons, Director, Technical Engineering with a staff of approximately 40 persons and a Director, Radiation Safety with a staff of approximately 30 persons.

The applicant has conducted a training program to train shift supervisory and control room personnel to operate Unit No. 3. A major feature of the training program provides that obtaining a license on Unit No. 2 be a prerequisite for Unit 3 licensed operating personnel for the initial plant staff. This will be followed by a three month familiarization program to learn the differences between Unit No. 2 and Unit No. 3.

The key non-shift supervisory personnel and technical staff are currently performing their respective job functions for Units 1 & 2. Their job responsibilities are being expanded to include Unit No. 3.

The qualifications of key supervisory personnel with regard to educational background, experience and technical specialties have been reviewed except as noted below and are in general conformance with those defined in ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel." Personnel have not as yet been assigned to the positions of the reactor engineer, Unit 3, and Unit 3 Watch Foremen. The staff's position is that the persons filling these positions should meet the referenced standard.

Technical support for the plant staff is available from the home office Departments of Mechanical Engineering, General Engineering, Electrical Engineering, Civil Engineering and the Office of Environmental Affairs.

We have concluded that the organizational structure, the training and qualifications of the staff for the Indian Point Station, Unit No. 3 is adequate to provide an acceptable operating staff and technical support for the safe operation of the facility. Additional technical support during the startup test program will be provided by WEDCO, a wholly owned subsidiary of Westinghouse Electric Corporation.

13.2 Emergency Planning

The applicant has established an organization for coping with emergencies. The plan includes written agreements, liaison and communications with appropriate local, State and Federal agencies that have responsibilities for coping with emergencies. The applicant has defined categories of incidents, including criteria for determining when protective measures should be considered and for the notification of off-site support.

groups. Arrangements have been made by the applicant to provide for medical support in the event of a radiological incident or other emergencies. Provisions for periodic training for both plant personnel and off-site emergency organizations have been included in the Emergency Plan. The elements of this plan are currently in effect for Units 1 & 2.

We have reviewed the Emergency Plan and conclude that it meets the criteria of Appendix E of 10 CFR 50, and that adequate arrangements have been made to cope with the possible consequences of the accidents at the site, and that there is reasonable assurance that such arrangements will be satisfactorily implemented in the unlikely event that they are needed.

13.3. Safety Review and Audit

The safety review and audit function for the Indian Point Station, Unit No. 3, will be conducted by the Nuclear Facilities Safety Committee, a committee that was established in 1962 for the Indian Point Unit No. 1 and has been performing that function since then for Unit No. 1 and subsequently for Unit No. 2. The Nuclear Facilities Safety Committee is advisory to the Executive Vice President and the President and Chairman of the Board and provides corporate management with a review and audit capability to verify that organizational checks and balances are functioning to assure continued safe operation and design adequacy of the plant. The applicant has assured that the Nuclear Facilities Safety Committee will function in accord with the requirements of ANSI N18.7 "Standard for

Administrative Control for Nuclear Power Plants" sections 4.0 through 4.4.

13.4 Plant Procedures

Plant operations are to be performed in accordance with written and approved operating and emergency procedures. Areas covered include normal startup, operation and shutdown, abnormal conditions and emergencies, refueling, maintenance, surveillance and testing, and radiation control. All procedures, and changes thereto will be reviewed prior to implementation.

We conclude that the provisions for preparation, review, approval, and use of written procedures are satisfactory.

13.5 Industrial Security

The applicant has submitted a description of its Industrial Security Plan for protection of the Indian Point Nuclear Power Station Unit No. 3 from industrial sabotage. The information was submitted as proprietary information pursuant to Section 2.790 of the Commission's regulations. We have reviewed the program and conclude that adequate security provisions have been made for the Indian Point Nuclear Power Station, Unit No. 3, and meets the intent and principles of Safety Guide No. 17.

14.1 Test and Startup Program

The initial startup, including preoperational checkout of equipment, functional and system tests, fuel loading, initial criticality and power operation will be performed by the regular plant staff. Technical assistance will be provided by MEDCO and Westinghouse.

We have reviewed the applicant's preoperational and startup testing program and conclude that it is in general accord with the AEC publications "Guide for the Planning of Preoperational Testing Programs" and "Guide for the Planning of Initial Startup Programs." The program will provide an adequate basis to confirm the safe operation of the plant and is therefore acceptable.