



STATE OF NEW YORK
ENERGY OFFICE
SWAN STREET BUILDING
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June 8, 1977

50-286

Mr. Robert Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

REGULATORY DOCKET FILE COPY

Dear Mr. Reid: Subject: Application by the Power Authority of the State
of New York to Operate Indian Point Unit #3

In March 1977 the Power Authority of the State of New York (PASNY) proposed a license amendment to allow PASNY to assume responsibility to operate Indian Point Unit #3. We have reviewed this proposed license amendment and have the following comments regarding it and its supporting documents. It is requested that you factor these comments into your review of this amendment.

Exhibit B

- Section 5- Since the Environmental Technical Specifications (Tech Specs) apply to the entire Indian Point Site, PASNY should indicate its plans for coordination with Con Edison to ensure that the Tech Specs are met.
- Section 1.3 - The discussion of shared safety related facilities is inadequate to assure their availability to Indian Point 3 during emergency as well as normal conditions. Of specific interest is the Service Air System, Radwaste System, Steam Generator Blowdown and Condensate Systems, demineralized water system and normal and backup auxiliary power systems. These should be investigated to ensure that the contractual agreements reached provide adequate assurance that these facilities or systems will be available for use by all plants whenever needed.
- Section 6.2 - This section and Table 6.2.1 requires that at least one operator with a license be in the control room during normal operations. It is recommended that the text be revised to specifically require that a licensed senior reactor operator be on site whenever fuel is in the reactor.

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- Section 6.2 - One of the provisions of this section would allow two hours of operation without a minimum crew if due to illness or absenteeism. This would appear to be reasonable when caused by illness or accident; however, some requirements should be included regarding the allowed minimum crew composition during such a shortage. The PASNY proposal to allow two hours of operation without a minimum crew during absenteeism should be seriously questioned. Holdover from a previous crew is a much more acceptable temporary measure to assure crew integrity in the event of absenteeism.
 - Section 6.5.2 - The definition of a quorum for the Safety Review Committee should be revised to require that, in a quorum, only a minority shall have line responsibility for operation of the plant. This cannot be assured by the wording in the present section.

Technical Support Information

- Figure 13.1.1.2-2 - This figure is inconsistent with Figure 13.1.1.2-1 and Section 13.1.1.2.1 in the designation of the person the Assistant Chief Engineer - Projects reports to.
- Figure 13.1.1.2-3 - This figure should be revised to reflect the number of technical personnel in each category, present and planned.
- Section 13.1.1.1.1 - This section should be revised to indicate the extent of PASNY's maintenance capability and the plans for its supplementation.
- Section 13.2.1 - The description of the biannual retraining program does not appear to include training in the areas of accident behavior and characteristics. This training is considered to be necessary to insure that an accident condition can be quickly and properly interpreted and its progress understood so that proper corrective actions can be taken as needed.
- Section 13.5.2.1 - The alarm response procedures do not appear to be totally consistent. It is stated that any alarm is assumed to be true; however, no corrective action is taken until the alarm is verified by either scanning the controls or having the roving operator make a local observation. This could result in some delay in taking needed corrective actions.

Emergency Plans

- Section 6.3 - The only communication link to the State mentioned is via telephone. Alternate communication modes should be available and mentioned in the emergency plan.

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Sincerely,



T. K. DeBoer, Director
Technological Development Programs

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