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March 16, 1977



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Mr. Ben C. Rusche
Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Power Authority of the State of New York
and Consolidated Edison Company of
New York, Inc.
(Indian Point No. 3 Nuclear Power Plant)
Docket No. 50-286

Dear Mr. Rusche:

As counsel for Power Authority of the State of New York and Consolidated Edison Company of New York, Inc. (Con Edison), we hereby transmit three (3) signed originals and nineteen (19) copies of an Application for Amendment to Facility Operating License No. DPR-64.

An amendment to Facility Operating License No. DPR-64, issued by the Commission on December 24, 1975, authorized the Power Authority to possess, but not to operate, the Indian Point No. 3 facility; while Con Edison, a co-licensee, was authorized to use and operate the facility. This application seeks amendment of Facility Operating License No. DPR-64 and Appendices A and B to that license to permit the Power Authority to assume sole responsibility for the operation of the Indian Point No. 3 Nuclear Power Plant.

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In support of this application, pursuant to Sections 50.33 and 50.34 of the Commission's regulations, forty (40) copies of a document entitled "Exhibits to Application for Amendment to Operating License -- March 1977," are also transmitted.

These Exhibits include sample technical specifications consisting in part of an amended Chapter 6 (Administrative Controls) of Appendix A to Facility Operating License DPR-64 and a proposed new Chapter 5 (Administrative Controls) of the Environmental Technical Specifications (Appendix B). Also included is a "Technical Support" package consisting of an Introduction and Summary, Site Control, Conduct of Operations, Site Emergency Plan and the Authority's Quality Assurance Program. The Power Authority's proposed Indian Point No. 3 Plant Industrial Security Plan will, in accordance with the recently published amendments to regulations 10 CFR Part 50 and 10 CFR Section 73.55, be transmitted under separate cover no later than May 25, 1977.

With respect to the Environmental Technical Specifications currently applicable to Indian Point Units 1, 2 and 3, the Authority proposes that they continue essentially in their present form as applicable to all three plants. A new Chapter 5 is proposed to be added to the joint Environmental Technical Specifications which addresses the administrative controls of the Power Authority. The Authority intends that this chapter be treated as a separate subpart applicable to Indian Point 3, while the present Chapter 5, describing Con Edison's administrative controls, will remain as a subpart applicable to Indian Point Units 1 and 2. Con Edison and the Authority have begun discussions leading toward agreements on the sharing of responsibility for meeting the conditions contained in the technical specifications which are applicable to the Indian Point site. These agreements will address the manner in which compliance with site requirements relating to both radiological and non-radiological effluents is to be coordinated, and will result in procedures which will clearly delineate responsibility and will provide the respective plant operators with clear instructions to implement those procedures. As noted on page 6 of the proposed Chapter 5 of the Environmental Technical Specifications, all required environmental reports which are applicable to the Indian Point site as a whole or to joint releases

will be prepared in conjunction with Con Edison, will be adopted by the Authority and Con Edison, and will be issued as joint reports. Agreement will also be made between the Authority and Con Edison for coordination of their respective review committees' responsibilities under the joint Environmental Technical Specifications.

The operating organization, emergency plan, quality assurance program, other arrangements described in this filing, and the Authority's security plan to be filed separately are proposed and will become effective only upon Commission approval. Prior technical submittals on these subjects are not superseded at this time.

A Certificate of Service is also transmitted herewith.

Very truly yours,

LeBoeuf, Lamb, Leiby & MacRae

LeBoeuf, Lamb, Leiby & MacRae
Attorneys for Power Authority
of the State of New York
and Consolidated Edison Company
of New York, Inc.