

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 736.8001



John H. Garrity
Resident Manager

November 13, 1993
IPN-93-141

James H. Joyner, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Subject: Indian Point Unit 3
Docket No. 50-286
Emergency Preparedness - Management Control
System to Effect Timely Emergency Response to
the Site

Reference: Indian Point Unit 3 Emergency
Preparedness Inspection (50-286/93-17)
Dated September 29, 1993

Dear Mr. Joyner:

In accordance with our telephone conversation held on September 29, 1993 and as stated in the reference, this letter provides the Authority's commitment to and description of a management control system that will assure and periodically confirm Indian Point 3's ability to effect timely augmentation of the normal shift staff for off-hours emergency response. The Authority acknowledges its ultimate responsibility to protect the health and safety of the public by maintaining an effective emergency response organization.

Since your staff concluded its emergency preparedness inspection in early September 1993, the Authority has taken affirmative actions to address this issue. These actions have included improving the notification process by revising the flowchart used by security to initiate the staff notifications, adding additional trained personnel to the call-in rosters, cross-training personnel to provide flexibility in manning the emergency response facilities, and increasing the staff's awareness on pager use and drill response.

9311190249 931113
PDR ADDCK 05000286
F PDR



TEB5
11

During the past two months, three pager call-back tests and two off-hours, unannounced emergency response drills have been conducted. The first of these two emergency response drills was held on October 28, 1993. The minimum required staffing per Emergency Plan table 5-1 was completed in 64 minutes. Additional security training was conducted and pagers were placed in Security's Central Alarm Station for pager activation confirmation. The second emergency response drill was held on November 3, 1993. The minimum required staffing per Emergency Plan table 5-1 was completed in 29 minutes, well within the 60 minute criteria.

To assure the continued effectiveness of the emergency response to the site, the Authority will:

- Conduct an off-hours, unannounced emergency response drill in December 1993. New York State and the four counties surrounding the plant will also be conducting an off-hours response drill as per FEMA-REP-14 Objectives 32 and 33, and will be observed by the Federal Emergency Management Agency (FEMA).
- Perform a pager call-back test six (6) times annually and compare the results to the minimum staffing requirements in Emergency Plan table 5-1. This is administratively controlled in IP-1085, "Maintenance of Emergency Preparedness at IP3" and IP-1076, "Emergency Plan Beepers."
- Conduct an off-hours, unannounced emergency response drill during calendar year 1994 and every two (2) years thereafter (the first cycle: January 1, 1995 to December 31, 1996). Based on the results of the 1994 pager call-back tests and the off-hours, unannounced emergency response drill, this type of drill may be made more frequent. The drill will be conducted in accordance with IP-1080, "Conduct of Emergency Exercise & Drills."
- Maintain sufficient personnel on the call-in roster through appropriate training and cross-training. This is administratively controlled in accordance with TP 15-12, "Emergency Response Training Program."

Also attached are the commitments made by the Authority in this letter. Should you have any additional questions regarding this matter, please contact me or Dennis Quinn at (914) 736-8401.

Very truly yours,

JHGarrity 11/13/93

John H. Garrity
Resident Manager
Indian Point Unit 3 Nuclear Power Plant

JHG/MAC/DWO

cc: Thomas T. Martin
Regional Administrator
Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop PI-137
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Resident Inspectors' Office

Attachment 1
List of Commitments

Number	Commitment	Due
IPN-93-141-01	Conduct an off-hours, unannounced emergency response drill in December 1993. New York State and the four counties surrounding the plant will also be conducting an off-hours response drill as per FEMA-REP-14 Objectives 32 and 33, and will be observed by the Federal Emergency Management Agency (FEMA).	December 1993
IPN-93-141-02	Perform a pager call-back test and compare the results to the minimum staffing requirements in Emergency Plan table 5-1. This is administratively controlled in IP-1085, "Maintenance of Emergency Preparedness at IP3" and IP-1076, "Emergency Plan Beepers."	Six (6) times annually
IPN-93-141-03	Conduct an off-hours, unannounced emergency response drill during calendar year 1994 and every two (2) years thereafter (the first cycle : January 1, 1995 to December 31, 1996). Based on the results of the 1994 pager call-back tests and the off-hours, unannounced emergency response drill, this type of drill may be made more frequent. The drill will be conducted in accordance with IP-1080, "Conduct of Emergency Exercise & Drills."	Every two years thereafter (the first cycle: January 1, 1995 to December 31, 1996)
IPN-93-141-04	Maintain sufficient personnel on the call-in roster through appropriate training and cross-training. This is administratively controlled in accordance with TP 15-12, "Emergency Response Training Program."	Continuously