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William J. Cahill, Jr.  
Chief Nuclear Officer

February 24, 1995  
IPN-95-021

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

SUBJECT: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
License No. DPR-64  
**Response to Request for Evaluation of  
Concern Regarding Activities at Indian Point 3**

Reference: NRC Letter, Richard W. Cooper, II to William J. Cahill, Jr., NYPA, dated  
January 25, 1995.

Dear Sir:

This letter is in response to your letter referenced above concerning activities at Indian Point 3. As requested, we have reviewed the concern outlined in the attachment to your letter. A summary of our review is contained in Attachment I to this letter. The attachment does not include personal privacy, proprietary or safeguards information.

We would be happy to discuss this issue further with you at your convenience. Should you have any questions regarding this matter, please contact Ms. C. Faison.

Attachment II lists the commitment that the Authority is making in this letter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'William J. Cahill, Jr.', written in a cursive style.

William J. Cahill, Jr.  
Chief Nuclear Officer

Attachments

cc: next page

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PDR ADOCK 05000286  
PDR

ADD 1

cc: Mr. Thomas T. Martin  
Regional Administrator  
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U.S. Nuclear Regulatory Commission  
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Mr. Richard W. Cooper, II, Director  
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Mr. Curtis Cowgill, Chief  
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Mr. Nicola F. Conicella, Project Manager  
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U.S. Nuclear Regulatory Commission  
Resident Inspectors' Office  
Indian Point 3 Nuclear Power Plant  
P.O. Box 337  
Buchanan, New York 10511

**Issue (Paraphrased)**

NYPA is planning to use non-licensed nuclear plant operators (NPOs) as Fire Brigade Leaders instead of an on-watch licensed reactor operator.

**NYPA Response**

Indian Point 3's Fire Brigade Leaders will continue to be licensed operators. The current qualifications are delineated in Training Procedure TNG-AD-16, revision 0, "Fire Protection Training Program." The applicable section is quoted as follows:

**"3.3 Fire Brigade Leader Training**

- 3.3.1 Personnel assigned as Fire Brigade Leaders must possess a valid Operator's license and receive eight hours of training in Fire Brigade Leadership. (Four hours of this training will be conducted concurrently with annual Fire Brigade training during "hands on" evolutions.)."

The Operations Department has been evaluating the need to improve the staffing of licensed operators on shift. One option considered as improving Control Room staffing was to assign the responsibility for Fire Brigade Leader to a non-licensed operator. As a result, Administrative Procedure AP-21 "Conduct of Operations," was revised to permit non-licensed NPOs to be assigned the duties of Fire Brigade Leader if qualified to do so. This action placed AP-21, revision 29, in conflict with other site procedures including AP-27.3, revision 11, "IP3 Site Fire Protection," and TNG-AD-16, revision 0. The Site Fire Protection System Engineer recognized this conflict and initiated a Deviation Event Report (DER) 95-0213, bringing this issue (premature revision of AP-21) to management's attention.

We have concluded that the staffing of the Control Room can be improved without reassigning the duties of Fire Brigade Leader to other Operations Department personnel. Therefore, as stated, the Fire Brigade Leader will continue to be a licensed operator. AP-21 will be revised by March 15, 1995 to delete the possible assignment of the Fire Brigade Leader to NPOs. At no time under AP-21, revision 29, have the duties of the Fire Brigade Leader been assigned to other than a licensed operator. This approach preserves the current qualification (i.e., licensed operator) of the Fire Brigade Leader.

List of Commitments

Number	Commitment	Due
IPN-95-021-01	The Fire Brigade Leader will continue to be a licensed operator. AP-21 will be revised by March 15, 1995 to delete the possible assignment of the Fire Brigade Leader to NPOs.	March 15, 1995