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NewYorkPower Authority

March 10, 1997
JPN-97-010
IPN-97-035

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

SUBJECT:

James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Response to Request for Additional Information
Pursuant to 10 CFR 50.54(f) Regarding
Adequacy and Availability of Design Bases Information

REFERENCES: See below.

Dear Sir:

In its response to the Commission's request for additional information regarding the adequacy and availability of design basis information (Reference 1), the Authority committed to submit a letter detailing the Authority's commitments with regard to design basis information (Reference 2) at its Indian Point 3 and James A. FitzPatrick Nuclear Power Plants. After careful review, the Authority is committing to the following initiatives to improve the availability of design basis information.

Final Safety Analysis Report Initiatives

The Authority is implementing an initiative to identify and correct FSAR (Final Safety Analysis Report) discrepancies for both the Indian Point 3 and James A. FitzPatrick Nuclear Power Plants. This letter fulfills the requirement described in the October 18, 1996 Federal Register notice (Reference 3) that a description of the initiative, including the scope and schedule, be publicly available. That notice described amendments to the NRC's Enforcement Policy to address issues associated with departures from the FSAR. The policy amendment included a provision for exercising enforcement discretion to refrain from issuing civil penalties and, in some instances, citations, for a two year period.

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The Authority will implement a three phase program. Phase one of the FSAR initiative will include:

- Development of an FSAR verification process, with appropriate administrative controls;
- Application of this process to FSAR text, figures and tables for a single "pilot" plant system;
- Conducting a vertical slice assessment of the same plant system;
- Comparison of the results of the verification to the vertical-slice assessment; and
- Feedback of the lessons-learned to improve the FSAR verification process.

Phase two will apply the process developed in phase one to the remaining safety-related plant systems. Phase three will be the completion of the remaining portions of the FSAR not covered by phases one or two. Risk significant systems will be given priority in the review schedule to the extent practical. Any discrepancies or deviations identified as part of this process will be recorded, evaluated, reported and resolved using normal Authority procedures. Feedback from phase one of the FSAR verification initiative will be integrated into the FSAR update process, as appropriate.

In addition to improving the accuracy of the FSAR, the program will also help to establish traceable engineering design and functional requirements for plant systems. Other improvements will also be considered including: better integration with other plant processes and procedures and improved availability of the design bases as described in the FSAR for use by Authority personnel. As part of a closely related program, existing Design Basis Documents (DBDs) will be validated to confirm their accuracy and updated to reflect changes completed since their issuance. Outstanding DBD open items will be dispositioned and the need for new DBDs will be considered.

Schedule

Phases one and two will be completed prior to the expiration of the two year period ending October 18, 1998 and detailed in the Federal Register notice (Reference 3). Phase three will be completed approximately one year later.

This initiative is in addition to FSAR self-assessments previously performed. FSAR assessments using the guidelines in NEI's (Nuclear Energy Institute) NEI 96-05, "Guidelines for Assessing Programs for Maintaining the Licensing Basis," were conducted during 1996 at both Indian Point 3 and FitzPatrick.

Periodic Vertical Slice Assessments

The Authority will implement a program of periodic vertical-slice assessment at both Indian Point 3 and FitzPatrick. Starting after the completion of phase two of the FSAR verification initiative, a minimum of one assessment per operating cycle will be conducted at each plant. These assessments will be based on the process outlined in the NRC Inspection Manual, Inspection Procedure 93801, "Safety System Functional Inspection," Reference 4. Assessment results will be used to confirm the associated portions of the design bases contained within the FSAR.

Attachment I summarizes the commitments made in this submittal. If you have any questions regarding this matter, please contact Ms. C. Faison, Director - Nuclear Licensing.

Sincerely,

J. Knubel
Senior Vice President and
Chief Nuclear Officer

References

1. NRC letter, James M. Taylor to Robert G. Schoenberger, dated October 9, 1996 regarding "Request for Information Pursuant to CFR 50.54(f) Regarding Adequacy and Availability of Design Bases Information"

2. NYPA letter, H. P. Salmon, Jr. to USNRC dated February 7, 1997 (JPN-97-005/IPN-97-016) regarding the same subject.

3. Federal Register Notice, 61 FR 54461 dated October 18, 1996, regarding NRC amended policy statement on enforcement actions associated with departures from the FSAR.

4. NRC Inspection Manual, Inspection Procedure 93801, "Safety System Functional Inspection"

List of Attachments

I. Summary of Commitments

cc: See next page

cc: Regional Administrator
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Attachment I to JPN-97-010/IPN-97-035
Summary of Commitments

Commitment Number	Description	Due Date
IPN-97-035-01 JPN-97-010-01	Complete phases one and two of the Authority's FSAR verification program to identify and correct any FSAR (Final Safety Analysis Report) discrepancies at both Indian Point 3 and FitzPatrick. This program will be designed to satisfy the provisions of the Commission's amended policy statement (61 FR 54461, October 18, 1996) on enforcement actions associated with departures from the FSAR.	October 18, 1998
IPN-97-035-02 JPN-97-010-02	Complete phase three of the Authority's FSAR verification program to identify and correct any FSAR discrepancies at both Indian Point 3 and FitzPatrick.	November 1, 1999
IPN-97-035-03 JPN-97-010-03	Implement a program of periodic vertical-slice assessments at both Indian Point 3 and FitzPatrick. A minimum of one assessment per operating cycle will be conducted at each plant.	Assessments will begin after the completion of phase two of the FSAR verification program