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James Knubel
Senior Vice President and
Chief Nuclear Officer

July 20, 1998 IPN-98-082 JPN-98-032

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

Subject:

Indian Point 3 Nuclear Power Plant

Docket No. 50-286

James A. FitzPatrick Nuclear Power Plant

Docket No. 50-333

90-Day Response to NRC Generic Letter 98-01

Year 2000 Readiness of Computer Systems at Nuclear Power Plants

References:

See below.

Dear Sir:

The purpose of this letter is to respond to the Nuclear Regulatory Commission's request for information regarding year 2000 (Y2K) readiness at nuclear power plants. Generic Letter (GL) 98-01 (Reference 1) requires that nuclear power plant licensees submit a written response indicating whether or not they have pursued and are continuing to pursue a Y2K program such as or similar to, that outlined in NEI/NUSMG 97-07 (Reference 2), augmented appropriately in the areas of risk management, contingency planning, and remediation of embedded systems. GL 98-01 requested that this response be submitted within 90 days of the date of the letter. The GL also requested nuclear power plant licensees to submit a written response, upon completing their Y2K program (or no later than July 1, 1999), confirming that their plants are Y2K ready, or will be Y2K ready, by the year 2000 with regard to compliance with the terms and conditions of the license and NRC regulation. This letter provides the Authority's 90-day response to GL 98-01 for the Indian Point 3 and James A. FitzPatrick Nuclear Power Plants.

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The Authority has pursued, and is continuing to pursue, a Y2K readiness program similar to that outlined in NEI/NUSMG 97-07 "Nuclear Utility Year 2000 Readiness" and the United States General Accounting Office's "Year 2000 Computing Crisis: An Assessment Guide," (Reference 3). The program will remediate potential Y2K problems

9807270241 980720 PDR ADDCK 05000286 P PDR that affect safety-related and other systems required by plant licenses or NRC regulations. The program includes identifying, testing and remediating embedded systems. The program also provides for risk management efforts and the development of contingency plans prior to critical dates. Additional guidance on contingency planning from NEI and GAO will be considered for incorporation into the Authority's Y2K plans after the guidance is finalized.

The Authority will submit a written response confirming that our facilities are or will be Y2K ready by the year 2000 with regard to compliance with the terms and conditions of our license and NRC regulations. This response will be submitted upon completion of our Y2K program, but no later than July 1, 1999. If appropriate, the response will include a status report and completion schedule for work remaining to be done to confirm Y2K readiness.

To the best of our knowledge and belief the facts contained within this letter are true and correct. Commitments made by the Authority in this submittal are summarized in Attachment 1.

If you have any questions concerning this matter, please contact Ms. C. D. Faison.

Very truly yours,

J. Khubel

Senior Vice President and

Chief Nuclear Officer

STATE OF NEW YORK COUNTY OF WESTCHESTER

Subscribed and Sworn to before me

this d

day of

1998

EILEEN E. O'CONNOR Notary Public, State of New York No. 4991062

Qualified in Westchester Count

Commission Expires January 21

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References:

- 1. NRC Generic Letter 98-01, "Year 2000 Readiness of Computer Systems at Nuclear Power Plants," dated May 11, 1998.
- 2. NEI/NUSMG 97-07 "Nuclear Utility Year 2000 Readiness," October 1997.
- 3. United States General Accounting Office (GAO) GAO/AIMD-10.1.14, "Year 2000 Computing Crisis: An Assessment Guide," September 1997.

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

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Mr. George F. Wunder, Project Manager Project Directorate I-1 Division of Reactor Projects - I/II U.S. Nuclear Regulatory Commission Mail Stop 14B2 Washington, DC 20555

Mr. Joseph F. Williams, Project Manager Project Directorate I-1 Division of Reactor Projects - I/II U.S. Nuclear Regulatory Commission Mail Stop 14B2 Washington, DC 20555

Attachment 1 to JPN-98-032/IPN-98-082 Summary of Commitments

Commitment Number	Description	Due Date
JPN-98-032-001	Submit a written response to the NRC confirming that FitzPatrick is or will be Y2K ready by the year 2000 with regard to compliance with the terms and conditions of the license and NRC regulations. If appropriate, the response will include a status report and completion schedule for work remaining to be done to confirm Y2K readiness.	Upon completion of Y2K program, or no latter than July 1, 1999.
JPN-98-032-002	Consider additional guidance on contingency planning from NEI and GAO for incorporation into the Authority's Y2K plans.	30-days after issuance of final NEI and/or GAO guidance.
IPN-98-082-001	Submit a written response to the NRC confirming that Indian Point 3 is or will be Y2K ready by the year 2000 with regard to compliance with the terms and conditions of the license and NRC regulations. If appropriate, the response will include a status report and completion schedule for work remaining to be done to confirm Y2K readiness.	Upon completion of Indian Point 3 Y2K program, or no latter than July 1, 1999.
IPN-98-082-002	Consider additional guidance on contingency planning from NEI and GAO for incorporation into the Authority's Y2K plans.	30-days after issuance of final NEI and/or GAO guidance.