

ATTACHMENT I TO IPN-93-127

PROPOSED TECHNICAL SPECIFICATION CHANGES
ASSOCIATED WITH THE
SAFETY REVIEW COMMITTEE

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

9310250215 931019
PDR ADOCK 05000286
P PDR

MEMBERSHIP

6.5.2.2 The SRC shall be composed of the following voting members:

Chairman:	Manager-Nuclear Safety Evaluation
Vice-Chairman:	Vice President - Appraisal and Compliance Services
Member:	Vice President-Nuclear Operations
Member:	Vice President-Nuclear Engineering
Member:	Resident Manager - IP3
Member:	Resident Manager - JAF
Member:	Consultant
Member:	Consultant

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the SRC Chairman. An Alternate Vice-Chairman shall be appointed in writing by the Executive Vice President-Nuclear Generation if necessary. However, no more than two alternates shall participate as voting members in SRC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

MEETING FREQUENCY

6.5.2.5 The SRC shall meet at least once per calendar quarter during the initial year of facility operation following initial fuel loading and at least once per six months, thereafter.

QUORUM

6.5.2.6 A quorum of SRC shall consist of the Chairman or Vice-Chairman or Alternate Vice-Chairman and four members, including alternates. No more than a minority of the quorum shall have direct line responsibility for the operation of the plant.

- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

AUTHORITY

- 6.5.2.9 The SRC shall report to and advise the Executive Vice President-Nuclear Generation on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

- 6.5.2.10 Records will be maintained in accordance with ANSI 18.7-1972. The following shall be prepared and distributed as indicated below:

- a. Minutes of each SRC meeting shall be prepared and forwarded to the Executive Vice President-Nuclear Generation within 30 days after the date of the meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above shall be prepared and forwarded to the Executive Vice President-Nuclear Generation within 30 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Executive Vice President-Nuclear Generation and to the management positions responsible for the areas audited within 30 days after the completion of the audit.

CHARTER

- 6.5.2.11 Conduct of the committee will be in accordance with a charter, approved by the Executive Vice President-Nuclear Generation, setting forth the mechanism for implementation of the committee's responsibilities and authority.

6.6 REPORTABLE EVENT ACTION

- 6.6.1 The following actions shall be taken for REPORTABLE EVENTS:
- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and

ATTACHMENT II TO IPN-93-127

SAFETY EVALUATION OF
TECHNICAL SPECIFICATION CHANGES
ASSOCIATED WITH THE
SAFETY REVIEW COMMITTEE

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

SAFETY EVALUATION OF
TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE
SAFETY REVIEW COMMITTEE

Section I - Description of Changes

The proposed changes to Section 6.5.2.2 will modify the membership of the SRC by:

- adding a second consultant
- removing the Vice President - Nuclear Support, and
- naming the Vice President - Appraisal and Compliance Services to replace the Director - Quality Assurance as member and SRC Vice Chairman.

It is also proposed that the time frame for preparing records of SRC activities be changed and made consistent with the current Westinghouse Standard Technical Specifications, contained in NUREG-1431 (WSTS).

Section II - Evaluation of Changes

The proposed changes in SRC membership are the result of several different and independent factors. The addition of a second consultant increases the Authority's flexibility to make use of expertise available in the industry, as needed, to address specific topics. The removal of the Vice President - Nuclear Support (VP-NS) is the result of a proposed organizational change in the Nuclear Generation Department (Reference 1). The groups previously reporting to the VP-NS will now be reporting to the Vice President - Nuclear Operations (VP-NO). Since the VP-NO is already assigned as an SRC member, the interests of those groups previously reporting to the VP-NS will still be represented. The third proposed change is intended to establish the SRC membership at a uniform management level. All SRC members, with the exception of consultants and the Director - Quality Assurance, have a direct reporting relationship to the Executive Vice President - Nuclear Generation (EVP). Elevating the quality assurance representation on SRC from the director level to the vice president level (Vice President - Appraisal and Compliance Services) will ensure that SRC activities receive appropriate management attention.

Changes in SRC record keeping requirements, found in Section 6.2.5.10, are also proposed. The time limit for providing the EVP with meeting minutes and reports of reviews is being changed from 14 days to 30 days. This is consistent with the WSTS. Additionally, the requirement in Section 6.5.2.10 and 6.5.2.10.a, that these minutes be approved in 14 days, is being removed. This change is also consistent with the WSTS, as they do not state a required time frame for the approval of SRC meeting minutes. Furthermore, the change is administrative as it does not change the process by which SRC minutes are approved. A copy of the SRC minutes will be distributed to the SRC members as well as the EVP within 30 days. However, the Authority considers these minutes to be a "draft" copy. Any comments

on these minutes by the SRC members are discussed and dispositioned at the next SRC meeting. Upon endorsement by SRC members, the Authority terms these minutes as "approved." These steps are detailed in the Authority procedure governing the SRC review and audit process (Reference 5). The proposed changes to the record keeping requirements are being made to provide a more appropriate time frame for issuing records of SRC activities.

Section III - No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

- (1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously analyzed?

Response:

The proposed changes do not involve a significant increase in the probability or consequences of a previously analyzed accident. The proposed changes to the SRC membership represent minor adjustments that do not alter the SRC function or the responsibilities of individual SRC members. The specific responsibilities of the SRC as stated in Technical Specification 6.5.2.7 are not affected. The proposed changes to the reporting requirements provide a more appropriate time frame for issuing records of SRC activities and are consistent with the WSTS. Therefore, the role of the SRC as an independent reviewer of safety and regulatory aspects of plant operations remains unchanged and SRC activities continue to be conducted in accordance with the provisions of ANSI N18.7 (Reference 3). This insures that the proposed amendment does not involve a significant increase in the probability or consequences of a previously analyzed accident.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response:

The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because they do not affect plant equipment or operation. The proposed changes are administrative in nature and do not alter the SRC function or the responsibilities of its members. SRC activities will continue to be conducted in accordance with the provisions of ANSI N18.7 and the role of the SRC as an independent reviewer of safety and regulatory aspects of plant operations will remain unchanged. Therefore, the proposed changes do not affect current plant configuration or current operating practices and will not create the possibility of a new or different kind of accident from any accident previously analyzed.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response:

The proposed changes do not involve a significant reduction in a margin of safety. The proposed changes to the SRC membership represent minor adjustments that do not alter the SRC function or the responsibilities of individual SRC members. The specific responsibilities of the SRC as stated in Technical Specification 6.5.2.7 are not affected. The proposed changes to the reporting requirements provide a more appropriate time frame for issuing records of SRC activities and are consistent with the WSTS. Therefore, the role of the SRC as an independent reviewer of safety and regulatory aspects of plant operations remains unchanged and SRC activities will continue to be conducted in accordance with the provisions of ANSI N18.7. This insures that the proposed amendment does not involve a significant reduction in a margin of safety.

Section IV - Impact of Changes

These changes will not adversely affect the following:

ALARA Program
Security and Fire Protection Programs
Emergency Plan
FSAR or SER Conclusions
Overall Plant Operations and the Environment

Section V - Conclusions

The incorporation of these changes: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the bases for any technical specification; d) does not constitute an unreviewed safety question; and e) involves no significant hazards considerations as defined in 10 CFR 50.92.

Section VI - References

1. NYPA Nuclear Safety Evaluation, NSE 93-03-260 MULT, Revision 0, "Organization Changes in the Nuclear Generation Department."
2. NUREG-1431, Rev. 0, "Standard Technical Specifications - Westinghouse Plants," dated September 28, 1992.

3. American National Standard ANSI N18.7 - 1972, "Administrative Controls for Nuclear Power Plants."
4. IP3 FSAR, Section 12.5.3, "Safety Review Committee (SRC)," July 1993.
5. NYPA Procedure, SRCP 1, Revision 6, "Safety Review Committee Charter," May 26, 1989.

Commitments Contained In IPN-93-127

Comm. No.	Commitment Description	Due Date
IPN-93-127-01	<p>The SRC shall be composed of the following voting members:</p> <p>Chairman: Manager-Nuclear Safety Evaluation Vice- Vice President - Appraisal and Chairman: Compliance Services Member: Vice President-Nuclear Operations Member: Vice President-Nuclear Engineering Member: Resident Manager - IP3 Member: Resident Manager - JAF Member: Consultant Member: Consultant</p>	30 days after NRC approval of Amendment
IPN-93-127-02	Minutes of each SRC meeting shall be prepared and forwarded to the Executive Vice President-Nuclear Generation within 30 days after the date of the meeting.	30 days after NRC approval of Amendment
IPN-93-127-03	Reports of reviews encompassed by Section 6.5.2.7 shall be prepared and forwarded to the Executive Vice President-Nuclear Generation within 30 days following completion of the review.	30 days after NRC approval of Amendment