

ATTACHMENT I TO IPN-94-038

PROPOSED TECHNICAL SPECIFICATION CHANGES
ASSOCIATED WITH
OPERATIONS MANAGER LICENSE REQUIREMENTS

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

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g) Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. (Operating personnel are defined as on shift senior reactor operators, reactor operators, nuclear plant operators, shift technical advisors and shift contingency health physicists, I&C and maintenance personnel.) However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual^e basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Resident Manager or his designee, or higher levels of management, in accordance with established procedures.

- h) At least one individual holding a Senior Reactor Operator (SRO) license shall be on duty in the Control Room at all times.
- i) The Assistant Operations Manager, Shift Supervisor and Senior Reactor Operator shall hold a Senior Reactor Operator (SRO) license. The Reactor Operator shall hold a Reactor Operator (RO) license. The Operations Manager shall either hold an SRO license or shall have held an SRO license at Indian Point Unit 3*.

* For the period ending three years after restart from the 1993/1994 Performance Improvement Outage, the Operations Manager will be permitted to have held an SRO license at a Pressurized Water Reactor other than Indian Point Unit 3.

ATTACHMENT II TO IPN-94-038

SAFETY EVALUATION OF
TECHNICAL SPECIFICATION CHANGES
ASSOCIATED WITH OPERATIONS MANAGER LICENSE REQUIREMENTS

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SAFETY EVALUATION
RELATED TO
PROPOSED TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH
OPERATIONS MANAGER REQUIREMENTS

Section I - Description of Changes

This application for amendment to the Indian Point Unit 3 (IP3) Technical Specifications proposes to temporarily revise Technical Specification 6.2 of Appendix A of the Operating License. The proposed revision to Technical Specification 6.2.2.i would temporarily allow the Operations Manager to have held a Senior Reactor Operator (SRO) license at a Pressurized Water Reactor (PWR) other than IP3. The proposed revision would be in effect for the period ending three years after restart from the 1993/1994 Performance Improvement Outage.

Section II - Evaluation of Changes

Recent organizational changes have necessitated the reevaluation of the IP3 Operations Department. The Authority has determined that a need exists to develop internal personnel who are qualified to assume the responsibilities of Operations Manager at IP3. The Authority anticipates that the development of internal personnel for this position will take two to three years. For the interim, the proposed revision to Technical Specification 6.2.2.i would allow the Authority to fill the Operations Manager position with an individual that does not have IP3 specific operating experience but does have appropriate experience at another PWR.

Proposed Technical Specification 6.2.2.i would require that, as a minimum, the Operations Manager has held an SRO license at a PWR. Technical Specification 6.3.1 requires that the Operations Manager meet or exceed the minimum qualifications of ANSI N18.1-1971 except for the SRO license requirement which is in accordance with Technical Specification 6.2.2.i. The proposed revisions to Technical Specification 6.2.2.i in conjunction with current Technical Specification 6.3.1 would allow an individual who has not held an SRO license at IP3 to be appointed Operations Manager provided all other qualifications of ANSI N18.1-1971 are met and the individual has held an SRO license at another PWR. The SRO license requirement of ANSI N18.1-1971 would continue to be met by the Assistant Operations Manager.

At IP3, the Assistant Operations Manager is responsible for the licensed and non-licensed operators and is directly in the reporting hierarchy between the Shift Supervisors and the Operations Manager. As such, the day-to-day activities of the operating crews are carried out under the direction of the Assistant Operations Manager. The Assistant Operations Manager meets or exceeds the ANSI N18.1-1971 qualifications listed under "operations manager" and holds a current SRO license at IP3.

ANSI N18.1-1971 specifically requires that the "operations manager" must be SRO licensed to ensure that one member of the line management organization has the detailed level of plant knowledge as that required to obtain and hold an SRO license. However, since a management reorganization in 1991, the Operations Manager no longer directly supervises day-to-day plant

operations. This function is carried out by the Assistant Operations Manager. Therefore, since the Assistant Operations Manager meets all requirements of "operations manager" in ANSI N18.1-1971 and is the person responsible for directing all the day-to-day activities of the Operations Department, it is not currently necessary that the Operations Manager have IP3 plant specific knowledge.

Since the Operations Manager will be required to meet the requirements of ANSI N18.1-1971 and will be required, as a minimum, to have held an SRO license at a PWR, there is assurance that the Operations Manager will be a knowledgeable and qualified individual. Since the Technical Specifications will continue to require that the Assistant Operations Manager hold a current SRO license, there is assurance that high level management within the Operations Department will maintain a knowledge of current plant systems and operations.

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 evaluated?

Response:

The proposed change does not involve an increase in the probability or consequences of a previously analyzed accident because licensed and non-licensed operator activities will continue to be directed by an individual who is required to maintain a current SRO license. The proposed change to Technical Specification 6.2.2.i in conjunction with existing Technical Specification 6.3.1 ensure that the Operations Manager will be a knowledgeable and qualified individual.

- (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 configuration or plant design. The Assistant Operations Manager, who is responsible for shift activities, is still required to maintain a knowledge of IP3 plant design and operations through requalification training. The proposed change to Technical Specification 6.2.2.i in conjunction with existing Technical Specification 6.3.1 ensure that the Operations Manager will be a knowledgeable and qualified individual.

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

Response:

The proposed amendment does not involve a significant reduction in a margin of safety because the Assistant Operations Manager is still required to maintain a current SRO license. This ensures that shift activities are directed by an individual holding an SRO license. The proposed change to Technical Specification 6.2.2.i in conjunction with existing Technical Specification 6.3.1 ensure that the Operations Manager will be a knowledgeable and qualified individual.

Section IV - Quality Assurance Program Description Change

The proposed technical specification change described above constitutes a change to the Quality Assurance Program description provided in the IP3 Updated Final Safety Analysis Report (FSAR) and in Technical Specification Amendment 134. Specifically, the proposed changes constitute a change to the commitment to require that, as a minimum, the Operations Manager will have held an SRO license at IP3. However, since the Assistant Operations Manager will be required to hold a current SRO license at IP3 and the Operations Manager will continue to be a knowledgeable and qualified individual, the intent of the commitment will continue to be satisfied. Therefore, the revised Quality Assurance Program will continue to satisfy the criteria of 10 CFR 50, Appendix B, and the intent of the Quality Assurance Program commitments previously accepted by the NRC. The revised FSAR pages associated with this change will be submitted to the NRC with the applicable annual IP3 FSAR update submittal.

Section V - 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 VI - 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; e) involves no significant hazards considerations as defined in 10 CFR 50.92; and f) will not reduce the intent of any Quality Assurance Program commitments.

Section VII - References

- a) IP3 FSAR
- b) IP3 SER

ATTACHMENT III TO IPN-94-038

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<u>Commitment Number</u>	<u>Commitment Description</u>	<u>Due Date</u>
IPN-94-038-01	The day to day activities of the Operations department are carried out under the direction of the Assistant Operations Manager who meets or exceeds the ANSI N18.1-1971 qualifications listed under "operations manager" and holds a current Senior Reactor Operator (SRO) license.	Currently Complete - This is an ongoing commitment.
IPN-94-038-02	The Operations Manager shall either hold an SRO license or shall have held an SRO license at Indian Point Unit 3 or at another Pressurized Water Reactor.	Currently Complete - This is an ongoing commitment that will end 3 years after startup from the Performance Improvement Outage.
IPN-94-038-03	The Operations Manager shall meet or exceed the minimum qualifications of ANSI N18.1-1971 except for the SRO license requirement.	Currently Complete - This is an ongoing commitment.
IPN-94-038-04	The revised FSAR pages associated with the change to the Operations Manager license requirements will be submitted to the NRC.	Applicable annual IP3 FSAR update submittal.