

ATTACHMENT I TO JPN-94-047 / IPN-94-117

PROPOSED TECHNICAL SPECIFICATION
CHANGES REGARDING
ADMINISTRATIVE CONTROLS

(JPTS-94-005)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

Docket No. 50-333

DPR-59

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6.0 ADMINISTRATIVE CONTROLS

Administrative Controls are the means by which plant operations are subject to management control. Measures specified in this section provide for the assignment of responsibilities, plant organization, staffing qualifications and related requirements, review and audit mechanisms, procedural controls and reporting requirements. Each of these measures are necessary to ensure safe and efficient facility operation.

6.1 RESPONSIBILITY

The Resident Manager is responsible for safe operation of the plant. During periods when the Resident Manager is unavailable, one of the three General Managers will assume this responsibility. In the event all four are unavailable, the Resident Manager may delegate this responsibility to other qualified supervisory personnel.

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

Onsite and offsite organizations shall be established for plant operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities that affect the safety of the nuclear power plant.

1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR.
2. The Resident Manager shall be responsible for overall plant operation, and shall have control over those onsite activities that are necessary for safe operation and maintenance of the plant.
3. The Executive Vice President and Chief Nuclear Officer shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 Plant Staff

The plant staff organization shall be as follows:

1. Each shift crew shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

(B) Alternates

Alternative members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PORC activities at any one time.

(C) Meeting Frequency

Meetings will be called by the Chairman as the occasions for review or investigation arise. Meetings will be no less frequent than once a month.

(D) Quorum

A quorum of the PORC shall consist of the Chairman or one of three Vice-Chairmen and five members including designated alternates. Vice-Chairmen may act as members when not acting as Chairman.

(E) Responsibilities

1. Review plant procedures, and changes thereto, required by Specification 6.8.
2. Review proposed tests and experiments that affect nuclear safety.
3. Review proposed changes to the Operating License and Technical Specifications.
4. Review proposed changes or modifications to plant systems or equipment that affect nuclear safety.
5. Investigate violations of the Technical Specifications and prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Resident Manager, who will forward the report to the Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and to the Chairman of the Safety Review Committee.
6. Review plant operations to detect potential safety hazards.
7. Review the Security Plan (including the Safeguards Contingency Plan) and implementing procedures annually.

8. Review the Emergency Plan and implementing procedures annually.
9. Perform special review and/or investigations at the request of the Resident Manager.
10. Review of all reportable events.
11. Review the Offsite Dose Calculation Manual (ODCM) and implementing procedures at least once per 24 months.
12. Review the Process Control Program (PCP) at least once per 24 months.

(F) Authority

The PORC shall function to advise the Resident Manager on all matters related to nuclear safety and environmental operations. The PORC shall recommend approval or disapproval to the Resident Manager of those items considered in 6.5 1E (1) through (4) and determine if items considered in 6.5 1E (1) through (5) constitute unreviewed safety questions, as defined in 10 CFR 50.59.

In the event of a disagreement between the PORC and the Resident Manager, the Chairman of the SRC and the Executive Vice President and Chief Nuclear Officer, or their designated alternates, shall be notified within 24 hours and written notification provided on the next business day; however, the Resident Manager shall have responsibility for resolution of such disagreement pursuant to Section 6.1.

(G) Records

Minutes of all meetings of the PORC shall be recorded and numbered. Copies will be retained in file. Copies will be forwarded to the Chairman of the SRC and the Executive Vice President and Chief Nuclear Officer.

(H) Procedures

Conduct of the PORC and the mechanism for implementation of its responsibilities and authority are defined in the pertinent Administrative Procedures.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

- 6.5.2.1 The SRC shall function to provide independent review and audit of designated activities in the areas of:
- a. Nuclear power plant operations
 - b. Nuclear engineering
 - c. Chemistry and radiochemistry
 - d. Metallurgy
 - e. Instrumentation and control

- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Environment
- k. Civil/Structural Engineering
- l. Nuclear Licensing
- m. Emergency Planning
- n. Other appropriate fields associated with the unique characteristics of a nuclear power plant

CHARTER

6.5.2.2 The conduct of the SRC will be in accordance with a charter approved by the Executive Vice President and Chief Nuclear Officer. The charter will define the SRC's authority and establish the mechanism for carrying out its responsibilities.

MEMBERSHIP

6.5.2.3 The SRC shall be composed of at least six individuals including a Chairman and a Vice Chairman. Members shall be appointed by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer. SRC members and alternates shall have an academic degree in engineering or a physical science, or the equivalent, and shall have a minimum of five years technical experience in one or more areas listed in Section 6.5.2.1.

ALTERNATES

6.5.2.4 Alternates for the Chairman, Vice Chairman and members may be appointed in writing by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer.

CONSULTANTS

6.5.2.5 Consultants may be used as determined by the SRC Chairman and as provided for in the charter.

MEETING FREQUENCY

6.5.2.6 The SRC shall meet at least once per six months.

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QUORUM

6.5.2.7 A quorum shall consist of at least a majority of the appointed individuals (or their alternates) and the Chairman (or the designated alternate). No more than two alternates may participate as SRC voting members at any one time. No more than a minority of the quorum shall have direct line responsibility for the operation of the plant.

REVIEW

6.5.2.8 The SRC shall review:

- a. The safety evaluation for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications of this Operating License.
- e. Violations of code, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All Reportable Events.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems or components.
- i. Reports and meetings minutes of the Plant Operating Review Committee.

AUDIT

6.5.2.9 Audits of facility activities shall be performed under the cognizance of the SRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.

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- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan (including the Safeguards Contingency Plan) and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the SRC or the Executive Vice President and Chief Nuclear Officer.
- h. The Facility Fire Protection Program and implementing procedures at least once per two years.
- i. An independent fire protection and loss of prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.
- 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.
- n. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

AUTHORITY

- 6.5.2.10 The SRC shall advise the Executive Vice President and Chief Nuclear Officer on those areas of responsibility specified in Section 6.5.2.8 and 6.5.2.9.

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6.5.2.11 RECORDS

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 and Chief Nuclear Officer within 30 days after the date of the meeting.
- b. Reports of reviews encompassed by Section 6.5.2.8 above shall be prepared and forwarded to the Executive Vice President and Chief Nuclear Officer within 30 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.9 above, shall be forwarded to the Executive Vice President and Chief Nuclear Officer and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE EVENT ACTION

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
- (B) Each Reportable Event shall be reviewed by the PORC, and the results of this review shall be submitted to the Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC.

6.7 SAFETY LIMIT VIOLATION

- (A) If a safety limit is exceeded, the reactor shall be shut down and
- (B) An immediate report of each safety limit violation shall be made to the NRC by the Resident Manager. The Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC will be notified within 24 hours.
- (C) The PORC shall prepare a complete investigative report of each safety limit violation and include appropriate analysis and evaluation of: (1) applicable circumstances preceding the occurrence, (2) effects of the occurrence upon facility component systems or structures and (3) corrective action required to prevent recurrence. The Resident Manager shall forward this report to the Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, the Chairman of the SRC, and the NRC.

6.8 PROCEDURES

- (A) Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5 "Facility Administrative Policies and Procedures" of ANSI 18.7-1972 and Appendix A of Regulatory Guide 1.33, November 1972. In addition, procedures shall be established, implemented and maintained for the Fire Protection Program and other programs, as specified in Appendix B of the Radiological Effluent Technical Specifications, Section 7.2.
- (B) Those procedures affecting nuclear safety shall be reviewed by PORC and approved by the Resident Manager prior to implementation.
- (C) Temporary changes to nuclear related procedures may be made provided:
 1. The intent of the original procedure is not altered.

ATTACHMENT II TO JPN-94-047 / IPN-94-117

PROPOSED TECHNICAL SPECIFICATION
CHANGES REGARDING
ADMINISTRATIVE CONTROLS

New York Power Authority

INDIAN POINT 3 NUCLEAR POWER PLANT

Docket No. 50-286

DPR-64

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Resident Manager shall be responsible for overall facility operation. During periods when the Resident Manager is unavailable, one of the three General Managers will assume his responsibilities. In the event all four are unavailable, the Resident Manager may delegate this responsibility to other qualified supervisory personnel.

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a) Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR.
- b) The Resident Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c) The Executive Vice President and Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

- c. Review of all proposed changes to the Operating License and Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.
- f. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Resident Manager, who will forward the report to the Executive Vice President and Chief Nuclear Officer, Vice President Regulatory Affairs and Special Projects, and the Chairman of the Safety Review Committee.
- g. Review of all reportable events.
- h. Review of facility operations to detect potential nuclear safety hazards.
- i. Performance of special reviews, investigations or analyses and reports thereon as requested by the Resident Manager or the Chairman of the Safety Review Committee (SRC).
- j. Review of the Plant Security Plan and implementing procedures annually.
- k. Review of the Emergency Plan and implementing procedures annually.
- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Resident Manager and to the Safety Review Committee.

AUTHORITY

- 6.5.1.7 The Plant Operating Review Committee shall:
- a) Recommend to the Resident Manager approval or disapproval of items considered under 6.5.1.6(a) through (e) above.
 - b) Render determinations with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question, as defined in 10 CFR 50.59.

- c) Provide notification within 24 hours to the Chairman of the SRC and the Executive Vice President and Chief Nuclear Officer of disagreement between the PORC and the Resident Manager; however, the Resident Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Operating Review Committee shall maintain minutes of each meeting and copies shall be provided to the Chairman of the SRC and Executive Vice President and Chief Nuclear Officer.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The SRC shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Environment
- k. Civil/Structural Engineering
- l. Emergency Planning
- m. Nuclear Licensing
- n. Other appropriate fields associated with the unique characteristics of a nuclear power plant.

CHARTER

6.5.2.2 The conduct of the SRC will be in accordance with a charter approved by the Executive Vice President and Chief Nuclear Officer. The charter will define the SRC's authority and establish the mechanism for carrying out its responsibilities.

MEMBERSHIP

6.5.2.3 The SRC shall be composed of at least six individuals including a Chairman and a Vice Chairman. Members shall be appointed by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer. SRC members and alternates shall have an academic degree in engineering or a physical science, or the equivalent, and shall have a minimum of five years technical experience in one or more areas listed in 6.5.2.1.

ALTERNATES

6.5.2.4 Alternates for the Chairman, Vice Chairman and members may be appointed in writing by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer.

CONSULTANTS

6.5.2.5 Consultants may be used as determined by the SRC Chairman and as provided for in the charter.

MEETING FREQUENCY

6.5.2.6 The SRC shall meet at least once per six months.

QUORUM

6.5.2.7 A quorum shall consist of at least a majority of the appointed individuals (or their alternates) and the Chairman (or the designated alternate). No more than two alternates may participate as SRC voting members at any one time. No more than a minority of the quorum shall have direct line responsibility for the operation of the plant.

REVIEW

- 6.5.2.8 The SRC shall review:
- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10CFR, to verify that such actions did not constitute an unreviewed safety question.
 - b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
 - c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
 - d. Proposed changes to Technical Specifications of this Operating License.
 - e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
 - f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
 - g. All REPORTABLE EVENTS.
 - h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
 - i. Reports and meetings minutes of the Plant Operating Review Committee.

AUDITS

6.5.2.9

Audits of facility activities shall be performed under the cognizance of the SRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B," 10 CFR 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan including the Safeguards Contingency Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the SRC or the Executive Vice President and Chief Nuclear Officer.
- h. The Facility Fire Protection Program and implementing procedures at least once per two years.
- i. A fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.

1. 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

- 6.5.2.10 The SRC shall advise the Executive Vice President and Chief Nuclear Officer on those areas of responsibility specified in Sections 6.5.2.8 and 6.5.2.9.

RECORDS

- 6.5.2.11 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 and Chief Nuclear Officer within 30 days after the date of the meeting.
- b. Reports of reviews encompassed by Section 6.5.2.8 above shall be prepared and forwarded to the Executive Vice President and Chief Nuclear Officer within 30 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.9 above, shall be forwarded to the Executive Vice President and Chief Nuclear Officer and to the management positions responsible for the areas audited within 30 days after the completion of the audit.

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

- b. Each REPORTABLE EVENT shall be reviewed by the PORC and a report submitted by the Resident Manager to the Executive Vice President and Chief Nuclear Officer, Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36(c)(1)(i).
- b. The Safety Limit Violation shall be reported immediately to the Commission. The Executive Vice President and Chief Nuclear Officer, Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC will be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared by the PORC. This report shall describe (1) applicable circumstances preceding the occurrences, (2) effects of the occurrence upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC by the Resident Manager.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Process Control Program implementation.
- g. Offsite Dose Calculation Manual implementation.

ATTACHMENT III to JPN-94-047 / IPN-94-117

SAFETY EVALUATION FOR PROPOSED
TECHNICAL SPECIFICATION CHANGES
REGARDING ADMINISTRATIVE CONTROLS

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59

INDIAN POINT 3 NUCLEAR POWER PLANT
Docket No. 50-286
DPR-64

SAFETY EVALUATION

I. DESCRIPTION OF PROPOSED CHANGES

This application for an amendment to the James A. FitzPatrick and Indian Point 3 Technical Specifications proposes to make changes to Section 6.0, "Administrative Controls":

James A. FitzPatrick:

1. Page 247, Specification 6.1, delete the last sentence:
"The Resident Manager reports directly to the Executive Vice President-Nuclear Generation."
2. Page 247, Specification 6.2.1.3, revise "Executive Vice President - Nuclear Generation" to read:
"Executive Vice President and Chief Nuclear Officer"
3. Page 249, Specification 6.5.1(E)5; delete "...Manager - Nuclear Operations and replace with:
"...Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects..."
4. Page 250, Specifications 6.5.1(F) and 6.5.1(G); same change as item 2.
5. Page 251, Insert new Specification 6.5.2.2 as follows:
"CHARTER
6.5.2.2 The conduct of the SRC will be in accordance with a charter approved by the Executive Vice President and Chief Nuclear Officer. The charter will define the SRC's authority and establish the mechanism for carrying out its responsibilities."
6. Page 251, change "6.5.2.2" to read "6.5.2.3" and replace list of members with the following:
"The SRC shall be composed of at least six individuals including a Chairman and a Vice Chairman. Members shall be appointed by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer. SRC members and alternates shall have an academic degree in engineering or a physical science, or the equivalent, and shall have a minimum of five years technical experience in one or more areas listed in Section 6.5.2.1."

SAFETY EVALUATION

Page 2 of 8

7. Page 251, change "6.5.2.3" to read "6.5.2.4" and revise to read as follows:

"Alternates for the Chairman, Vice Chairman and members may be appointed in writing by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer."

8. Page 251, change "6.5.2.4" to read "6.5.2.5" and revise to read as follows:

"Consultants may be used as determined by the SRC Chairman and as provided for in the charter."

9. Page 251, change "6.5.2.5" to read "6.5.2.6" and delete "...at least once per calendar quarter during the initial year of facility operation following initial fuel loading and...thereafter." The revised specification reads as follows:

"The SRC shall meet at least once per six months."

10. Page 252, change "6.5.2.6" to read "6.5.2.7" and replace the first sentence with the following:

"A quorum shall consist of at least a majority of the appointed individuals (or their alternates) and the Chairman (or the designated alternate). No more than two alternates may participate as SRC voting members at any one time."

11. Page 252, change "6.5.2.7" to read "6.5.2.8" and change "6.5.2.8" to read "6.5.2.9".

12. Page 252a, Specification 6.5.2.9 g; same change as item 2.

13. Page 252a, change "6.5.2.9" to read "6.5.2.10" and delete "...report to and...". The revised specification reads as follows:

"The SRC shall advise the Executive Vice President and Chief Nuclear Officer on those areas of responsibility specified in Section 6.5.2.8 and 6.5.2.9."

14. Page 252b, change "6.5.2.10" to read "6.5.2.11" and make same change as item 2 in three locations. Also, revise cross reference to other sections as follows:

In 6.5.2.11 b; change "6.5.2.7" to "6.5.2.8" , and
In 6.5.2.11 c; change "6.5.2.8" to "6.5.2.9".

SAFETY EVALUATION

15. Page 253; delete Specification 6.5.2.11 regarding charter. The charter for the SRC is discussed in the proposed new Specification 6.5.2.2.
16. Page 253; Specifications 6.6(B), 6.7(B), and 6.7(c); same change as item 2.
17. Page 253; Specifications 6.6(B), 6.7(B), and 6.7(c); add:
"the Vice President Regulatory Affairs and Special Projects"
18. Page 253; Specification 6.6(B); revise to read "... and *the Chairman of the SRC.*"

Indian Point 3:

1. Table of Contents page vi; move Section 6.5.2.11 (Charter) to 6.5.2.2 and renumber sections that follow.
2. Page 6-1, Specification 6.1, delete the last sentence:
"The Resident Manager reports directly to the Executive Vice President-Nuclear Generation."
3. Page 6-1, Specification 6.2.1.c, revise "Executive Vice President - Nuclear Generation" to read:
"Executive Vice President and Chief Nuclear Officer"
4. Page 6-7, Specification 6.5.1.6.f; revise reporting requirement to require that in addition to the Executive Vice President and Chief Nuclear Officer and the Chairman of the Safety Review Committee, report shall be provided to the Vice President Regulatory Affairs and Special Projects.
5. Page 6-8, Specifications 6.5.1.7.c and 6.5.1.8; same change as item 3.
6. Page 6-9, Insert new Specification 6.5.2.2 as follows:

"CHARTER"

- 6.5.2.2 The conduct of the SRC will be in accordance with a charter approved by the Executive Vice President and Chief Nuclear Officer. The charter will define the SRC's authority and establish the mechanism for carrying out its responsibilities."

SAFETY EVALUATION

7. Page 6-9, change "6.5.2.2" to read "6.5.2.3" and replace list of members with the following:

"The SRC shall be composed of at least six individuals including a Chairman and a Vice Chairman. Members shall be appointed by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer. SRC members and alternates shall have an academic degree in engineering or a physical science, or the equivalent, and shall have a minimum of five years technical experience in one or more areas listed in 6.5.2.1."

8. Page 6-9, change "6.5.2.3" to read "6.5.2.4" and revise to read as follows:

"Alternates for the Chairman, Vice Chairman and members may be appointed in writing by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer."

9. Page 6-9, change "6.5.2.4" to read "6.5.2.5" and revise to read as follows:

"Consultants may be used as determined by the SRC Chairman and as provided for in the charter."

10. Page 6-9, change "6.5.2.5" to read "6.5.2.6" and delete "...at least once per calendar quarter during the initial year of facility operation following initial fuel loading and...thereafter." The revised specification reads as follows:

"The SRC shall meet at least once per six months."

11. Page 6-9, change "6.5.2.6" to read "6.5.2.7" and replace the first sentence with the following:

"A quorum shall consist of at least a majority of the appointed individuals (or their alternates) and the Chairman (or the designated alternate). No more than two alternates may participate as SRC voting members at any one time."

12. Page 6-10, change "6.5.2.7" to read "6.5.2.8".

13. Page 6-11, change "6.5.2.8" to read "6.5.2.9" and same change to specification 6.5.2.9.g as item 3.

SAFETY EVALUATION

14. Page 6-12, change "6.5.2.9" to read "6.5.2.10" and delete "...reports to and...". The revised specification reads as follows:

"The SRC shall advise the Executive Vice President and Chief Nuclear Officer on those areas of responsibility specified in Section 6.5.2.8 and 6.5.2.9."
15. Page 6-12, change "6.5.2.10" to read "6.5.2.11" and make same change as item 3 in three locations. Also, revise cross reference to other sections as follows:

In 6.5.2.11 b; change "6.5.2.7" to "6.5.2.8" , and
In 6.5.2.11 c; change "6.5.2.8" to "6.5.2.9".
16. Page 6-12; delete Specification 6.5.2.11 regarding charter. The charter for the SRC is discussed in the proposed new Specification 6.5.2.2.
17. Page 6-13; Specifications 6.6.1.b, 6.7.1.b, and 6.7.1.d; same change as items 3 and 4.

Minor changes in format, such as type font, margins or hyphenation, are not described in this submittal. These changes are typographical in nature and do not affect the content of the Technical Specifications.

II. PURPOSE OF THE PROPOSED CHANGES

The proposed changes are part of a reorganization of the New York Power Authority.

1. The title of the position "Executive Vice President - Nuclear Generation" is being changed to "Executive Vice President and Chief Nuclear Officer." This is a change in title only. The responsibilities and authority of the position remain unchanged.
2. One aspect of the reorganization changes the reporting relationship of the Resident Managers. The Resident Managers are responsible to the Executive Vice President and Chief Nuclear Officer for overall nuclear safety. The Resident Managers will report administratively to the Vice President Nuclear Operations. The responsibilities and authority of the Resident Manager with respect to the safe operation and maintenance of the plant as described in the Technical Specifications are not changed.

Details of reporting relationships were previously removed from the Technical Specifications (References 1 and 2). Organization charts and functional descriptions of responsibilities and relationships are documented and maintained in the Updated FSAR. The statement of the reporting relationship for the Resident Manager is being deleted to be consistent with this approach.

SAFETY EVALUATION

3. A second aspect of the reorganization adds the new position, Vice President Regulatory Affairs and Special Projects. The responsibilities for this position include management of all licensing activities for the Authority's two nuclear power plants. The Vice President Regulatory Affairs and Special Projects is added to the distribution of reportable event reviews performed by PORC and is included in the notification of safety limit violations. The Safety Review Committee reporting requirement is being deleted and will be defined in the SRC charter and the Updated FSAR's. The SRC will continue to advise the Executive Vice President and Chief Nuclear Officer on matters concerning nuclear safety and provide him with reports of SRC activities.
4. A proposed change would replace the SRC membership list in the Technical Specifications with a description of membership requirements, including the minimum number of members, membership approval, and minimum qualifications. The identification of specific members will be made in the written charter which governs SRC activities. The charter and any revisions to it must be approved by the Executive Vice President and Chief Nuclear Officer. This change does not affect the use of alternates or consultants as members, provided that the qualification requirements are met and the approval of the Executive Vice President and Chief Nuclear Officer is obtained.

III. SAFETY IMPLICATIONS OF THE PROPOSED CHANGES

The proposed changes will have no impact on safety. The Executive Vice President and Chief Nuclear Officer's authority and responsibilities are unchanged. The Executive Vice President and Chief Nuclear Officer continues to be responsible for all nuclear related issues within the Authority and for overall management and monitoring of the Authority's nuclear power plants. The Executive Vice President and Chief Nuclear Officer continues to have the organizational and financial authority to assure the safe operation of the plants.

The statement regarding the Resident Managers reporting to the Executive Vice President and Chief Nuclear Officer is being deleted. The Resident Managers will continue to be responsible to the Executive Vice President and Chief Nuclear Officer for nuclear safety but will report administratively to the Vice President Nuclear Operations. This reporting relationship will be described in the Updated FSAR's. Since the role and responsibilities of the Resident Managers are unchanged, there is no decrease in safety.

The organizational reporting relationship for the Safety Review Committee (SRC) is being deleted and will be defined in the SRC charter and the Updated FSAR's. The Executive Vice President and Chief Nuclear Officer will approve the SRC charter and membership. The SRC will also continue to advise the Executive Vice President and Chief Nuclear Officer on matters concerning nuclear safety. The effectiveness of the SRC as an oversight committee will not be reduced.

SAFETY EVALUATION

Removal of the SRC membership list will not affect safety. The SRC charter and membership will be approved by the Executive Vice President and Chief Nuclear Officer. In addition, qualification requirements for SRC membership are being added to the Technical Specifications.

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Operation of the FitzPatrick and Indian Point 3 nuclear power plants in accordance with the proposed amendment would not involve a significant hazards consideration as defined in 10 CFR 50.92, since it would not:

1. involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change is purely administrative and does not involve plant equipment or operating parameters. There is no change to any accident analysis assumptions or other conditions which could effect previously evaluated accidents. The proposed change will not decrease the effectiveness of the organization's ability to respond to a design basis accident.
2. create the possibility of a new or different kind of accident from those previously evaluated. Since the proposed change is administrative in nature and does not involve hardware design or operation, it cannot create the possibility of a new or different kind of accident.
3. involve a significant reduction in the margin of safety. The authority and responsibilities of the Resident Managers and the Executive Vice President and Chief Nuclear Officer with respect to the safe operation and maintenance of the FitzPatrick and Indian Point 3 nuclear plants are not being reduced or otherwise changed. The proposed changes do not reduce the effectiveness of the SRC as an oversight committee.

V. IMPLEMENTATION OF THE PROPOSED CHANGES

Implementation of the proposed changes will be made through revisions to applicable documents. Changes in management structure are documented in the Updated FSARs.

The conduct of the SRC is governed by a written charter as required by Specification 6.5.2.2. Any changes to that charter as a result of the proposed amendment require the approval of the Executive Vice President and Chief Nuclear Officer.

There are no physical plant modifications required. The proposed changes will not affect the ALARA, Fire Protection, or Security Programs at the FitzPatrick or Indian Point 3 plants, nor will the changes affect the environment.

SAFETY EVALUATION

VI. CONCLUSION

The change, as proposed, does not constitute an unreviewed safety question as defined in 10 CFR 50.59. That is, the proposed change:

1. will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report;
2. will not create the possibility for an accident or malfunction of a type different from any evaluated previously in the Safety Analysis Report;
3. will not reduce the margin of safety as defined in the basis for any technical specification.

The proposed change involves no significant hazards consideration, as defined in 10 CFR 50.92.

VII. REFERENCES

1. NRC letter dated September 7, 1989; D. E. LaBarge to J. C. Brons; regarding issuance of Amendment 137 to James A. FitzPatrick Operating License.
2. NRC letter dated September 8, 1989; J. D. Neighbors to J. C. Brons; regarding issuance of Amendment 89 to the Indian Point 3 Operating License.

ATTACHMENT IV TO JPN-94-047 / IPN-94-117

MARKED UP PAGES FOR
PROPOSED TECHNICAL SPECIFICATION
CHANGES REGARDING ADMINISTRATIVE CONTROLS

(JPTS-94-005)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59

6.0 ADMINISTRATIVE CONTROLS

Administrative Controls are the means by which plant operations are subject to management control. Measures specified in this section provide for the assignment of responsibilities, plant organization, staffing qualifications and related requirements, review and audit mechanisms, procedural controls and reporting requirements. Each of these measures are necessary to ensure safe and efficient facility operation.

6.1 RESPONSIBILITY

The Resident Manager is responsible for safe operation of the plant. During periods when the Resident Manager is unavailable, one of the three General Managers will assume this responsibility. In the event all four are unavailable, the Resident Manager may delegate this responsibility to other qualified supervisory personnel. ~~The Resident Manager reports directly to the Executive Vice President - Nuclear Generation.~~

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

Onsite and offsite organizations shall be established for plant operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities that affect the safety of the nuclear power plant.

1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR.
2. The Resident Manager shall be responsible for overall plant operation, and shall have control over those onsite activities that are necessary for safe operation and maintenance of the plant.
3. The Executive Vice President ~~-Nuclear Generation~~ ~~and Chief Nuclear Officer~~ shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 Plant Staff

The plant staff organization shall be as follows:

1. Each shift crew shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

(B) Alternates

Alternative members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PORC activities at any one time.

(C) Meeting Frequency

Meetings will be called by the Chairman as the occasions for review or investigation arise. Meetings will be no less frequent than once a month.

(D) Quorum

A quorum of the PORC shall consist of the Chairman or one of three Vice-Chairmen and five members including designated alternates. Vice-Chairmen may act as members when not acting as Chairman.

(E) Responsibilities

1. Review plant procedures, and changes thereto, required by Specification 6.8.
2. Review proposed tests and experiments that affect nuclear safety.
3. Review proposed changes to the Operating License and Technical Specifications.
4. Review proposed changes or modifications to plant systems or equipment that affect nuclear safety.
5. Investigate violations of the Technical Specifications and prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Resident Manager, who will forward the report to the ~~Manager Nuclear Operations Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects,~~ and to the Chairman of the Safety Review Committee.
6. Review plant operations to detect potential safety hazards.
7. Review the Security Plan (including the Safeguards Contingency Plan) and implementing procedures annually.

8. Review the Emergency Plan and implementing procedures annually.
9. Perform special review and/or investigations at the request of the Resident Manager.
10. Review of all reportable events.
11. Review the Offsite Dose Calculation Manual (ODCM) and implementing procedures at least once per 24 months.
12. Review the Process Control Program (PCP) at least once per 24 months.

(F) Authority

The PORC shall function to advise the Resident Manager on all matters related to nuclear safety and environmental operations. The PORC shall recommend approval or disapproval to the Resident Manager of those items considered in 6.5 1E (1) through (4) and determine if items considered in 6.5 1E (1) through (5) constitute unreviewed safety questions, as defined in 10 CFR 50.59.

In the event of a disagreement between the PORC and the Resident Manager, the Chairman of the SRC and the Executive Vice President —~~Nuclear Generation and Chief Nuclear Officer~~, or their designated alternates, shall be notified within 24 hours and written notification provided on the next business day; however, the Resident Manager shall have responsibility for resolution of such disagreement pursuant to Section 6.1.

(G) Records

Minutes of all meetings of the PORC shall be recorded and numbered. Copies will be retained in file. Copies will be forwarded to the Chairman of the SRC and the Executive Vice President —~~Nuclear Generation and Chief Nuclear Officer~~.

(H) Procedures

Conduct of the PORC and the mechanism for implementation of its responsibilities and authority are defined in the pertinent Administrative Procedures.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

- 6.5.2.1 The SRC shall function to provide independent review and audit of designated activities in the areas of:
- a. Nuclear power plant operations
 - b. Nuclear engineering
 - c. Chemistry and radiochemistry
 - d. Metallurgy
 - e. Instrumentation and control

- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Environment
- k. Civil/Structural Engineering
- l. Nuclear Licensing
- m. Emergency Planning
- n. Other appropriate fields associated with the unique characteristics of a nuclear power plant

~~CHARTER~~ *(moved from 6.5.2.11, with minor editorial changes)*

~~6.5.2.2 The conduct of the SRC will be in accordance with a charter approved by the Executive Vice President and Chief Nuclear Officer. The charter will define the SRC's authority and establish the mechanism for carrying out its responsibilities.~~

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 Engineering~~
- ~~Member: Vice President Nuclear Operations~~
- ~~Member: Resident Manager IP3~~
- ~~Member: Resident Manager JAF~~
- ~~Member: Consultant~~
- ~~Member: Consultant~~

~~MEMBERSHIP~~

~~6.5.2.3 The SRC shall be composed of at least six individuals including a Chairman and a Vice Chairman. Members shall be appointed by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer. SRC members and alternates shall have an academic degree in engineering or a physical science, or the equivalent, and shall have a minimum of five years technical experience in one or more areas listed in 6.5.2.1.~~

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. Alternates for the Chairman, Vice Chairman and members may be appointed in writing by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer.~~

Amendment No. -50, 60, 65, 78, 94, 100, 105, 123, 202,

CONSULTANTS

6.5.2.4 ~~Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC. Consultants may be used as determined by the SRC Chairman and as provided for in the charter.~~

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.~~

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QUORUM

6.5.2.6 ~~A quorum of SRC shall consist of the Chairman, Vice Chairman or Alternate Vice Chairman and four members, including alternates. A quorum shall consist of at least a majority of the appointed individuals (or their alternates) and the Chairman (or the designated alternate). No more than two alternates may participate as SRC voting members at any one time. No more than a minority of the quorum shall have a direct line responsibility for the operation of the plant.~~

REVIEW

6.5.2.7 The SRC shall review:

- a. The safety evaluation for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications of this Operating License.
- e. Violations of code, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All Reportable Events.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems or components.
- i. Reports and meetings minutes of the Plant Operating Review Committee.

AUDIT

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the SRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.

JAFNPP

- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan (including the Safeguards Contingency Plan) and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the SRC or the Executive Vice President - Nuclear Generation and Chief Nuclear Officer.
- h. The Facility Fire Protection Program and implementing procedures at least once per two years.
- i. An independent fire protection and loss of prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.
- 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.
- n. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

AUTHORITY

- 6.5.2.9-10 The SRC shall report to and advise the Executive Vice President - Nuclear Generation and Chief Nuclear Officer on those areas of responsibility specified in Section 6.5.2.7 ~~8~~ and 6.5.2.8 ~~9~~.

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6.5.2.10 ~~RECORDS~~

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 and Chief Nuclear Officer~~ within 30 days after the date of the meeting.
- b. Reports of review encompassed by Section 6.5.2.7 above shall be prepared and forwarded to the Executive Vice President ~~Nuclear Generation and Chief Nuclear Officer~~ 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 Chief Nuclear Officer~~ and to the management positions responsible for the areas audited within 30 days after completion of the audit.

CHARTER (moved to section 6.5.2.2 with minor editorial changes)

~~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

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
- (B) Each Reportable Event shall be reviewed by the PORC, and the results of this review shall be submitted to ~~the SRC and the Executive Vice President Nuclear Generation and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC.~~

6.7 SAFETY LIMIT VIOLATION

- (A) If a safety limit is exceeded, the reactor shall be shut down and
- (B) An immediate report of each safety limit violation shall be made to the NRC by the Resident Manager. ~~The Executive Vice President Nuclear Generation and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and Chairman of the SRC will be notified within 24 hours.~~
- (C) The PORC shall prepare a complete investigative report of each safety limit violation and include appropriate analysis and evaluation of: (1) applicable circumstances preceding the occurrence, (2) effects of the occurrence upon facility component systems or structures and (3) corrective action required to prevent recurrence. The Resident Manager shall forward this report to ~~the Executive Vice President Nuclear Generation and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, the Chairman of the SRC and the NRC.~~

6.8 PROCEDURES

- (A) Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5 "Facility Administrative Policies and Procedures" of ANSI 18.7-1972 and Appendix A of Regulatory Guide 1.33, November 1972. In addition, procedures shall be established, implemented and maintained for the Fire Protection Program and other programs, as specified in Appendix B of the Radiological Effluent Technical Specifications, Section 7.2.
- (B) Those procedures affecting nuclear safety shall be reviewed by PORC and approved by the Resident Manager prior to implementation.
- (C) Temporary changes to nuclear related procedures may be made provided:
 1. The intent of the original procedure is not altered.

ATTACHMENT V TO JPN-94-047 / IPN-94-117

MARKED UP PAGES FOR
PROPOSED TECHNICAL SPECIFICATION
CHANGES REGARDING ADMINISTRATIVE CONTROLS

New York Power Authority.

INDIAN POINT 3 NUCLEAR POWER PLANT

Docket No. 50-286

DPR-64

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Resident Manager shall be responsible for overall facility operation. During periods when the Resident Manager is unavailable, one of the three General Managers will assume his responsibilities. In the event all four are unavailable, the Resident Manager may delegate this responsibility to other qualified supervisory personnel. ~~The Resident Manager reports directly to the Executive Vice President Nuclear Generation.~~

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a) Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR.
- b) The Resident Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c) The Executive Vice President and Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

- c. Review of all proposed changes to the Operating License and Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.
- f. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Resident Manager, who will forward the report to the and Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and the Chairman of the Safety Review Committee
- g. Review of all reportable events.
- h. Review of facility operations to detect potential nuclear safety hazards.
- i. Performance of special reviews, investigations or analyses and reports thereon as requested by the Resident Manager or the Chairman of the Safety Review Committee (SRC).
- j. Review of the Plant Security Plan and implementing procedures annually.
- k. Review of the Emergency Plan and implementing procedures annually.
- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Resident Manager and to the Safety Review Committee.

AUTHORITY

- 6.5.1.7 The Plant Operating Review Committee shall:
- a) Recommend to the Resident Manager approval or disapproval of items considered under 6.5.1.6(a) through (e) above.
 - b) Render determinations with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question, as defined in 10 CFR 50.59.

- c) Provide notification within 24 hours to the Chairman of the SRC and the Executive Vice President and Chief Nuclear Officer of disagreement between the PORC and the Resident Manager; however, the Resident Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Operating Review Committee shall maintain minutes of each meeting and copies shall be provided to the Chairman of the SRC and Executive Vice President and Chief Nuclear Officer.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The SRC shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Environment
- k. Civil/Structural Engineering
- l. Emergency Planning
- m. Nuclear Licensing
- n. Other appropriate fields associated with the unique characteristics of a nuclear power plant.

CHARTER

6.5.2.2 The conduct of the SRC will be in accordance with a charter approved by the Executive Vice President and Chief Nuclear Officer. The charter will define the SRC's authority and establish the mechanism for carrying out its responsibilities.

MEMBERSHIP

6.5.2.3 The SRC shall be composed of at least six individuals including a Chairman and a Vice Chairman. Members shall be appointed by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer. SRC members and alternates shall have an academic degree in engineering or a physical science, or the equivalent, and shall have a minimum of five years technical experience in one or more areas listed in 6.5.2.1.

ALTERNATES

6.5.2.4 Alternates for the Chairman, Vice Chairman and members may be appointed in writing by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer.

CONSULTANTS

6.5.2.5 Consultants may be used as determined by the SRC Chairman and as provided for in the charter.

MEETING FREQUENCY

6.5.2.6 The SRC shall meet at least once per six months.

QUORUM

6.5.2.7 A quorum shall consist of at least a majority of the appointed individuals (or their alternates) and the Chairman (or the designated alternate). No more than two alternates may participate as SRC voting members at any one time. No more than a minority of the quorum shall have direct line responsibility for the operation of the plant.

REVIEW

6.5.2. The SRC shall review:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications of this Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meetings minutes of the Plant Operating Review Committee.

AUDITS

6.5.2.9

Audits of facility activities shall be performed under the cognizance of the SRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B," 10 CFR 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan including the Safeguards Contingency Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the SRC or the Executive Vice President and Chief Nuclear Officer.
- h. The Facility Fire Protection Program and implementing procedures at least once per two years.
- i. A fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.

1. 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

6.5.2.10 The SRC shall ~~report to and~~ advise the Executive Vice President ~~and Chief Nuclear Officer~~ on those areas of responsibility specified in Sections 6.5.2.8 and 6.5.2.9.

RECORDS

6.5.2.11 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 ~~and Chief Nuclear Officer~~ within 30 days after the date of the meeting.
- b. Reports of reviews encompassed by Section 6.5.2.8 above shall be prepared and forwarded to the Executive Vice President ~~and Chief Nuclear Officer~~ within 30 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.9 above, shall be forwarded to the Executive Vice President ~~and Chief Nuclear Officer~~ 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

- b. Each REPORTABLE EVENT shall be reviewed by the PORC and a report submitted by the Resident Manager to the Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36(c)(1)(i).
- b. The Safety Limit Violation shall be reported immediately to the Commission. The Executive Vice President and Chief Nuclear Officer, Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC will be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared by the PORC. This report shall describe (1) applicable circumstances preceding the occurrences, (2) effects of the occurrence upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Executive Vice President and Chief Nuclear Officer, the Vice President Regulatory Affairs and Special Projects, and the Chairman of the SRC by the Resident Manager.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Process Control Program implementation.
- g. Offsite Dose Calculation Manual implementation.

ATTACHMENT VI to JPN-94-047/IPN-94-117

COMMITMENTS RELATED TO
PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS REGARDING
ADMINISTRATIVE CONTROLS

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59

INDIAN POINT 3 NUCLEAR POWER PLANT
Docket No. 50-286
DPR-64

COMMITMENTS RELATED TO
PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS REGARDING
ADMINISTRATIVE CONTROLS

<u>Commitment Number</u>	<u>Commitment Description</u>	<u>Due Date</u>
IPN-94-117-01 JPN-94-047-01	The title of the position "Executive Vice President - Nuclear Generation" is being changed to "Executive Vice President and Chief Nuclear Officer."	Within the Implementation period after NRC approval
IPN-94-117-02 JPN-94-047-02	The responsibilities and authority of the Resident Manager with respect to the safe operation and maintenance of the plant as described in the Technical Specifications are not changed. The Resident Manager may report administratively to the Vice President Nuclear Operations.	Within the Implementation period after NRC approval
IPN-94-117-03 JPN-94-047-03	Reportable event reviews performed by PORC, reports regarding the investigation of all violations of the Technical Specifications, and safety limit violation reports shall be distributed to the new position of Vice President Regulatory Affairs and Special Projects.	Within the Implementation period after NRC approval
IPN-94-117-04 JPN-94-047-04	The new position of Vice President Regulatory Affairs and Special Projects will be notified of a safety limit violation within 24 hours.	Within the Implementation period after NRC approval
IPN-94-117-05 JPN-94-047-05	The conduct of the SRC will be in accordance with a charter approved by the Executive Vice President and Chief Nuclear Officer. The charter will define the SRC's authority and establish the mechanism for carrying out its responsibilities.	Within the Implementation period after NRC approval
IPN-94-117-06 JPN-94-047-06	SRC members shall be appointed by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer. Identification of specific members of the SRC will be made in the written charter which governs SRC activities.	Within the Implementation period after NRC approval

COMMITMENTS RELATED TO
PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS REGARDING
ADMINISTRATIVE CONTROLS

<u>Commitment Number</u>	<u>Commitment Description</u>	<u>Due Date</u>
IPN-94-117-07 JPN-94-047-07	SRC members and alternates shall have an academic degree in engineering or a physical science, or the equivalent, and shall have a minimum of five years technical experience in one or more areas listed in Technical Specification 6.5.2.1.	Within the Implementation period after NRC approval
IPN-94-117-08 JPN-94-047-08	Alternates for the SRC Chairman, SRC Vice Chairman and SRC members may be appointed in writing by the Vice President Regulatory Affairs and Special Projects and approved by the Executive Vice President and Chief Nuclear Officer.	Within the Implementation period after NRC approval
IPN-94-117-09 JPN-94-047-09	Consultants may be used as determined by the SRC Chairman and as provided for in the SRC charter.	Within the Implementation period after NRC approval
IPN-94-117-10 JPN-94-047-10	A quorum of SRC shall consist of at least a majority of the appointed individuals (or their alternates) and the Chairman (or the designated alternate). No more than two alternates may participate as SRC voting members at any one time. No more than a minority of the quorum shall have direct line responsibility for the operation of the plant.	Within the Implementation period after NRC approval