

ATTACHMENT I TO JPN-94-064 / IPN-94-149

REPLACEMENT PAGES
FOR
SAFETY EVALUATION FOR PROPOSED
TECHNICAL SPECIFICATION CHANGES
REGARDING ADMINISTRATIVE CONTROLS

INSTRUCTIONS:

REMOVE

Page 6
Page 7
Page 8

INSERT

Page 6, 29 NOV 1994
Page 7, 29 NOV 1994
Page 8, 29 NOV 1994

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

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SAFETY EVALUATION

Page 6 of 8

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 FSARs. 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 minimum qualifications, and minimum number of members.

Establishing minimum qualifications for members provides greater flexibility in appointing members to the committee. Specific individuals appointed as members of SRC are identified in the charter which governs SRC activities. The charter and any revisions to it must be approved by the Executive Vice President and Chief Nuclear Officer.

The minimum number of members is being reduced from 8 to 6. This change will allow the consultant positions to be treated as optional instead of required members. Use of consultants remains an important feature of the SRC to obtain the perspective of individuals outside the Authority and to obtain expertise on specific topics. The quorum statement is reworded to be consistent with the proposed minimum number of members. The existing statement and the proposed change both require a majority of members, one of which must be the Chairman or designee.

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 FSARs. Since the role and responsibilities of the Resident Managers are unchanged, there is no decrease in safety.

SAFETY EVALUATION

Page 7 of 8

The organizational reporting relationship for the Safety Review Committee (SRC) is being deleted and will be defined in the SRC charter and the Updated FSARs. 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.

Replacing the SRC membership list with a description of minimum requirements will not affect safety. Establishing minimum qualifications, in terms of education and experience, provides consistent criteria for the selection of members. Appointment of specific individuals as members must be approved by the Executive Vice President and Chief Nuclear Officer.

The proposed revision to the minimum number of members and the quorum is consistent with ANSI N18.7-1972 (Reference 3) which is the standard committed to by the Authority. The proposed minimum number of members is 6 with a majority required for a quorum. ANSI N18.7 requires a minimum of 5 members, with a majority needed for a quorum. The SRC chairman is responsible to ensure that appropriate members are present, as needed, to review specific subject matter regardless of the minimum quorum requirement.

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.

SAFETY EVALUATION

Page 8 of 8

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.

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.
3. American National Standard, ANSI N18.7-1972, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."