

ATTACHMENT I TO IPN-95-026

**PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING  
TECHNICAL SPECIFICATION POSITION TITLES**

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 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.

- d) 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

- a) Each duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b) At least one Licensed Operator shall be in the control room when fuel is in the reactor.
- c) At least two Licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d) An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e) ALL CORE ALTERATIONS shall be directly supervised by an individual holding either a Senior Reactor Operator license or a Senior Reactor Operator license Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f) Deleted.

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 individuals holding Senior Reactor Operator or Reactor Operator licenses, 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 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 and Shift Manager shall hold a Senior Reactor Operator (SRO) license. The Operations Manager shall either hold an SRO license or shall have held an SRO license at Indian Point Unit 3\*.

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\* 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.

## ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the (PORC) Chairman to serve on a temporary basis.

## MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

## QUORUM

6.5.1.5 A quorum of the PORC shall consist of the Chairman or one of the two Vice-Chairmen, and five members including alternates. Vice-Chairmen may act as members when not acting as Chairman. A quorum shall contain no more than two alternates.

## RESPONSIBILITIES

- 6.5.1.6 The Plant Operating Review Committee shall be responsible for:
- a. Review of 10 CFR 50.59 safety and environmental impact evaluations associated with procedures and programs required by Technical Specification 6.8, and changes thereto.
  - b. Review of all proposed tests and experiments that affect 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 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. Deleted
- k. Deleted
- 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.
- m. Review of the Fire Protection Program and implementing procedures.

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 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 the 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 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 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 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.

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. Deleted
- f. Deleted
- g. Any other area of facility operation considered appropriate by the SRC or the 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.

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

AUTHORITY

6.5.2.10 The SRC shall advise the 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 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 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 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 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 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 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.

6.12.2 The requirements of 6.12.1 above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or the plant Radiological and Environmental Services Manager or his designee.

6.13 ENVIRONMENTAL QUALIFICATION

6.13.1 Environmental qualification of electric equipment important to safety shall be in accordance with the provisions of 10 CFR 50.49. Pursuant to 10 CFR 50.49, Section 50.49 (d), the EQ Master List identifies electrical equipment requiring environmental qualification.

6.13.2 Complete and auditable records which describe the environmental qualification method used, for all electrical equipment identified in the EQ Master List, in sufficient detail to document the degree of compliance with the appropriate requirements of 10 CFR 50.49 shall be available and maintained at a central location. Such records shall be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

ATTACHMENT II TO IPN-95-026

**SAFETY EVALUATION OF  
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING  
TECHNICAL SPECIFICATION POSITION TITLES**

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

SAFETY EVALUATION  
RELATED TO  
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING  
TECHNICAL SPECIFICATION POSITION TITLES

**Section I - Description of Changes**

This application for amendment proposes to change several sections of Chapter 6 of the Indian Point 3 Technical Specifications. These changes include:

1. deleting the position titles of Senior Reactor Operator (SRO) and Reactor Operator and replacing them with qualification requirements and
2. changing the position titles for the Shift Supervisor and the Executive Vice President and Chief Nuclear Officer to Shift Manager and Chief Nuclear Officer, respectively.

**Section II - Evaluation of Changes**

This amendment application proposes to reword Technical Specifications Sections 6.2.2.e, 6.2.2.g and 6.2.2.i to specify the qualifications, instead of position titles, needed to comply with the minimum shift requirements for Senior Reactor Operators (SRO) and Reactor Operators (RO) specified in Technical Specification Table 6.2-1. These changes will allow the Authority to replace the current title of SRO with Control Room Supervisor. This title change will not affect the function or qualifications of this position, but will signify the switchover of this position from union to management. The Authority is not currently planning a title change for the RO, but is rewording the Technical Specifications concerning this position for consistency.

Currently, the requirements in these sections have been implemented by giving the position title of SRO or RO to an individual with the proper qualifications. The intent of the specifications, however, was to require that the individuals hold a valid SRO or RO license, not to specify position titles. Therefore, this application proposes to replace the term "licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling" in Section 6.2.2.e with the phrase "an individual holding either a Senior Reactor Operator license or a Senior Reactor Operator license Limited to Fuel Handling." Similarly, in Section 6.2.2.g, the term "senior reactor operators, reactor operators" has been replaced with "individuals holding Senior Reactor Operator and Reactor Operator licenses." This wording specifies the qualifications needed to fulfill the Technical Specifications, rather than the applicable position title.

Similarly, in Section 6.2.2.i, the references to the SRO and RO requiring an applicable license have been deleted. The number and qualifications needed for the minimum shift crew composition are presented in Technical Specification Table 6.2-1. This table stipulates the minimum number of individuals holding SRO and RO licenses needed in the control room during all modes of operation. Therefore, it is redundant to repeat the SRO and RO license requirements in Section 6.2.2.i.

This interpretation is consistent with the terminology used in Sections 5.1.2 and 5.2.2 of the Westinghouse Standard Technical Specifications (WSTS) (Reference 1). The WSTS specify the qualifications needed to fulfill the minimum shift crew requirements, rather than the position titles.

In addition, this amendment proposes to replace the titles of the Shift Supervisor and the Executive Vice President and Chief Nuclear Officer with Shift Manager and Chief Nuclear Officer, respectively. These title changes are administrative in nature as they do not alter the qualification requirements necessary for the positions.

Lastly, as part of the Authority's ongoing effort to improve the organizational structure, the Resident Managers are now reporting directly to the Chief Nuclear Officer. This change does not affect the Technical Specifications, but is reported here for informational purposes.

### **Section III - No Significant Hazards Evaluation**

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

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

Response:

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously analyzed. The proposed changes eliminate the position titles of SRO and RO and replace them with required qualifications. These changes do not alter the function or criterion necessary to fulfill the minimum shift crew requirements listed in Technical Specification Table 6.2-1. The position title changes for the Shift Supervisor and the Executive Vice President and Chief Nuclear Officer are administrative in nature.

- (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 are administrative in nature. The changes do not affect plant equipment or operation. They allow the Authority to replace the position title of SRO with Control Room Supervisor. This change signifies the switchover of this position from union to management, but does not alter the position's functions or license requirements. The Authority is not planning a title change for the RO, but is rewording the Technical Specifications concerning this

position for consistency. The change in position titles from the Shift Supervisor and the Executive Vice President and Chief Nuclear Officer to Shift Manager and Chief Nuclear Officer, respectively, are administrative changes.

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

Response:

The proposed changes do not involve a significant reduction in a margin of safety. The proposed changes eliminate the position titles of SRO and RO and replace them with required qualifications. These changes do not alter the function or criterion necessary to fulfill the minimum shift crew requirements listed in Technical Specification Table 6.2-1. The position title changes for the Shift Supervisor and the Executive Vice President and Chief Nuclear Officer are administrative as they do not alter the qualifications necessary to fill these positions.

#### **Section IV - Impact of Changes**

These changes will not adversely affect the following:

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

#### **Section V - Conclusions**

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

#### **Section VI - References**

1. NUREG-1431, Rev. 0, "Standard Technical Specifications - Westinghouse Plants," dated September 28, 1992.

ATTACHMENT III TO IPN-95-026

**AUTHORITY COMMITMENTS FOR  
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING  
TECHNICAL SPECIFICATION POSITION TITLES**

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

**COMMITMENTS ASSOCIATED WITH IPN-95-026**

Comm. No.	Commitment Description	Due Date
IPN-95-026-01	Update the FSAR to reflect the information included in this amendment request.	Next applicable annual FSAR update
IPN-95-026-02	Update procedures to reflect new position titles.	Next revision of applicable procedures