

Attachment I to IPN-96-101

**REVISED TECHNICAL SPECIFICATION PAGES  
PORC REVIEW OF FIRE PROTECTION PROGRAM**

**New York Power Authority**

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

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- 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 Site Executive Officer and to the Safety Review Committee.
  
- m. Deleted

#### AUTHORITY

- 6.5.1.7 The Plant Operating Review Committee shall:
- a. Recommend to the Site Executive Officer 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 Site Executive Officer; however, the Site Executive Officer 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

**LIST OF PAGE CHANGES**

**PORC REVIEW OF FIRE PROTECTION PROGRAM**

Revise Appendix A as follows:

Remove Page

6-8

Insert Page

6-8

Attachment II to IPN-96-101

**SAFETY EVALUATION**

**PORC REVIEW OF FIRE PROTECTION PROGRAM**

**New York Power Authority**

**INDIAN POINT 3 NUCLEAR POWER PLANT**

**Docket No. 50-286**

**DPR-64**

**I. DESCRIPTION**

The proposed change to the Indian Point 3 Technical Specifications (TS) deletes the requirement for the Plant Operating Review Committee (PORC) to review the fire protection program and implementing procedures. This proposal will reduce the administrative burden on the committee while making PORC's responsibilities more consistent with the other responsibilities described in Section 6.5.1.6 of the TS. PORC will continue to oversee changes to the Indian Point 3 fire protection program through its review of nuclear safety evaluations.

Page 6-8

Replace Specification 6.5.1.6.m, which states:

"Review of the Fire Protection Program and implementing procedures."

with:

"Deleted"

**II. PURPOSE OF THE PROPOSED CHANGE**

The changes will reduce the administrative burden on the PORC by eliminating review requirements which provide a limited safety benefit. Deleting PORC's responsibility for review of the fire protection program and implementing procedures does not increase the probability or consequences of a fire at Indian Point, nor will it decrease the effectiveness of the program. Other review and oversight responsibilities will provide a high degree of confidence in the overall quality of the fire protection program and implementing procedures.

**Removal of Fire Protection Requirements from the Technical Specifications**

This PORC responsibility was added by Amendment 157 (References 1, 2, 3 and 4). The amendment revised the TS to relocate fire protection requirements to the fire protection program in accordance with the guidance provided in NRC Generic Letter (GL) 88-12, "Removal of Fire Protection Requirements from the Technical Specifications," (Reference 5). GL 88-12 recommended that licensees propose two changes to the administrative controls section of the TS. These changes were (1) the PORC shall be given responsibility for the review of the fire protection program and implementing procedures, and (2) fire protection program implementation shall be added to the list of elements for which written procedures are required. GL 88-12 states that the emergency plan and security plan were used as models to determine the appropriate administrative controls for fire protection.

**New Review and Approval Process for Procedures**

Subsequent to the relocation of fire protection requirements, the NRC issued Amendment 159 (References 6, 7 and 8) to the Indian Point 3 TS. This amendment established a new review and approval process for procedures required by TS Section 6.8. This process relies upon qualified individuals to perform technical and safety reviews of procedures and eliminates the requirement for PORC review of procedures. Amendment 159 also removed the review and audit requirements for emergency and security plans based on recommendations of Generic Letter 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans," (Reference 9). With the issuance of Amendment 159, the basis for PORC review of the fire protection

program and implementing procedures was superseded.

PORC review of the fire protection program and implementing procedures does not provide a significant safety benefit because adequacy of the program and procedures is assured by the procedure review and approval process implemented by Amendment 159. The procedure review and approval process requires that safety and technical reviews of procedures be performed by qualified individuals, that required safety and/or environmental impact evaluations be reviewed by PORC, and that procedures be approved by appropriate members of plant management. The procedure review and approval process is applicable to procedures that implement and define the fire protection program.

#### **Operating License Condition**

Amendment 157 also revised the Indian Point 3 Facility Operating License to include the NRC's standard fire protection license condition. This condition requires that any changes to the fire protection program be approved by the NRC, unless the changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

#### **10 CFR 50.59 and FSAR**

The NRC-approved fire protection program is included in FSAR Section 9.6.2 "Fire Protection," and thus, any changes to the program as described in the FSAR are controlled under the provisions of 10 CFR 50.59. The Fire Protection Reference Manual currently described on FSAR page 9.6-12 has been replaced (Reference 10) by Administrative Procedure AP-27.3, "IP3 Site Fire Protection."

#### **Safety Review Committee Inspection and Audit**

Inspection and audit of the fire protection program is performed under the cognizance of the Safety Review Committee (SRC) as required by Specification 6.5.2.9.h.

### **III. SAFETY IMPLICATIONS OF THE PROPOSED CHANGE**

PORC review of the fire protection program and implementing procedures does not enhance safety because adequacy of the program is assured by the fire protection license condition, the procedure review and approval process implemented by Amendment 159, the provisions of 10 CFR 50.59, and inspections and audits performed under the cognizance of the SRC.

Consequently, deleting PORC's responsibility for review of the fire protection program and implementing procedures will not degrade the fire protection program. Therefore, there is no safety implication associated with the proposed change.

#### **IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION**

Operation of the Indian Point 3 plant 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 changes delete the Plant Operating Review Committee (PORC) review of the fire protection program and implementing procedures. The changes do not introduce any new modes of plant operation, make any physical changes, or alter any operational setpoints. Therefore, the changes do not degrade the performance of any safety system assumed to function in the accident analysis. Consequently, there is no effect on the probability or consequences of an accident.

2. create the possibility of a new or different kind of accident from those previously evaluated.

No physical changes to the plant or changes to equipment operating procedures are proposed. The changes are administrative and will not have any direct effect on equipment important to safety. Therefore the changes cannot create the possibility of a new or different kind of accident.

3. involve a significant reduction in the margin of safety.

Adequacy of the fire protection program and implementing procedures is assured by the fire protection license condition, the procedure review and approval process implemented by Amendment 159, the provisions of 10 CFR 50.59, and inspections and audits performed under the cognizance of the SRC. Consequently, deleting PORC's responsibility for review of the fire protection program and implementing procedure will not degrade the fire protection program. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

#### **V. IMPLEMENTATION OF THE PROPOSED CHANGE**

Implementation of the proposed change will not adversely affect the ALARA or fire protection programs at the Indian Point 3 plant, nor will the change impact the environment.

#### **VI. CONCLUSION**

Based on the discussion above, the requirement for the PORC to review the fire protection program and implementing procedures can be removed from the Technical Specifications without adversely affecting the fire protection program.

The Plant Operating Review Committee (PORC) and Safety Review Committee (SRC) have reviewed this proposed change to the Technical Specifications and have concluded that it does not involve an unreviewed safety question or a significant hazards consideration and will not endanger the health and safety of the public.

**VII. REFERENCES**

1. NRC letter, N. F. Conicella (USNRC) to W. J. Cahill, Jr. (NYPA) dated January 13, 1995, regarding issuance of amendment for Indian Point 3 Nuclear Generating Unit No. 3 (TAC No. M89352). Transmits amendment 157 and associated safety evaluation.
2. NRC letter, N. F. Conicella (USNRC) to W. J. Cahill, Jr. (NYPA) dated February 8, 1995, regarding administrative error in issuance of Facility Operating License Amendment No. 157 - Indian Point 3 Nuclear Generating Unit No. 3 (TAC No. M89352).
3. NYPA letter, W. A. Josiger to USNRC (IPN-94-047) dated April 18, 1994, regarding proposed changes to the technical specifications and to the operating license to relocate fire protection technical specification requirements.
4. NYPA letter, W. J. Cahill, Jr. to USNRC (IPN-94-136) dated October 25, 1994, regarding request for additional information on the proposed changes to the technical specifications and to the operating license to relocate fire protection technical specification requirements.
5. NRC Generic Letter 88-12, "Removal of Fire Protection Requirements from Technical Specifications," dated August 2, 1988.
6. NRC letter, N. F. Conicella (USNRC) to W. J. Cahill, Jr. (NYPA) dated January 17, 1995 regarding issuance of amendment for Indian Point 3 Nuclear Generating Unit No. 3 (TAC No. M89818). Transmits amendment 159 and associated safety evaluation.
7. NYPA letter, W. A. Josiger to USNRC (IPN-94-078) dated June 29, 1994, regarding proposed changes to technical specifications regarding plant operating review committee (PORC) membership and review responsibilities.
8. NYPA letter, W. J. Cahill, Jr. to USNRC (IPN-94-150) dated December 2, 1994, regarding supplement to the proposed changes to technical specifications regarding plant operating review committee (PORC) membership and review responsibilities.
9. NRC Generic Letter 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans," dated December 28, 1993.
10. NSE 96-03-175FP, REV 0, "Revision To AP 27.3 and FSAR Section 9.6.2.1."