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James Knobel
Senior Vice President and
Chief Nuclear Officer

March 20, 1998
IPN-98-033

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: **Indian Point 3 Nuclear Power Plant**
Docket No. 50-286
Supplement to the Proposed Technical Specification Changes Associated
With SRC Audit Requirements and a Management Title Change

- References:
1. NYPA letter, J. Knobel to NRC (IPN-97-051), "Proposed Technical Specification Changes Associated With SRC Audit Requirements and a Management Title Change," dated April 14, 1997.
 2. NYPA letter, J. Knobel to NRC (IPN-97-144), "Revision to the Proposed Technical Specification Changes Associated With SRC Audit Requirements and a Management Title Change," dated October 17, 1997.

Dear Sir:

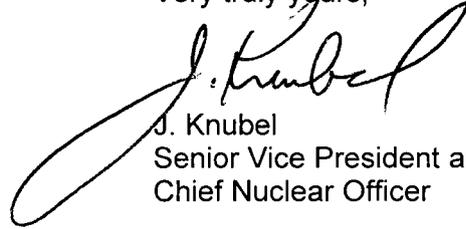
The referenced letters submitted proposed Technical Specification changes which revise SRC audit requirements and change the title of Vice President Regulatory Affairs and Special Projects to Director Regulatory Affairs and Special Projects. Attachment I provides the details of how the proposed Technical Specification change which requires the SRC to review, rather than audit, plant staff performance will be implemented. This supplemental information does not alter the no significant hazards determination contained in Reference 1.

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Attachment II contains the commitments made in this submittal. If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,



J. Knubel
Senior Vice President and
Chief Nuclear Officer

Attachments: As stated

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
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King of Prussia, PA 19406

Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
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Mr. F. William Valentino, President
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ATTACHMENT I TO IPN-98-033

**Supplement to the Safety Evaluation for the Proposed Technical Specification Changes
Associated With SRC Audit Requirements and a Management Title Change**

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

**Supplement to Safety Evaluation for the Proposed Technical Specification Changes
Associated with SRC Audit Requirements and a Management Title Change**

The referenced document proposed to eliminate the requirements for the SRC to audit plant staff performance and replace it with a requirement for SRC to review plant staff performance. The review of plant staff performance will be accomplished by the following activities.

- SRC will assess the plant staff performance on a continual basis as part of its oversight function conducted at each scheduled meeting. This assessment will be based upon a review of documents such as Nuclear Safety Evaluations, Licensee Event Reports, NRC Inspection Reports, PORC minutes, SRC Subcommittee Reports, Audit Reports and presentations by the Site Executive Officers and plant staff on plant performance. This will be further supplemented by NRC SALP Reports and industry plant/corporate evaluations.
- Quality Assurance (QA) and the Operations Review Group (ORG) will prepare a quarterly trending report which identifies actual quality performance issues through the issuance of a quarterly report. The scope of the trending report encompasses the review and analysis of documents such as the monthly QA summary observation reports, Quarterly Integrated Self-Assessment and Trend Reports, Nuclear Generation Monthly Performance Indicator Reports, SRC Meeting Minutes, NRC Inspection Reports/Notice of Violations, and Root Cause Analysis Reports. This report will be distributed to all SRC members and discussed at SRC meetings.

These activities will ensure that plant staff performance is effectively monitored on an ongoing basis and documented as part of the SRC meeting minutes. This process is more effective than an annual audit as it allows the Authority to make prompt, effective decisions regarding plant staff performance on an ongoing basis, rather than once per year.

Auditing the performance of the facility staff is part of each QA audit. Each QA audit has performance based, as well as compliance based, elements. The annual performance audit is a roll up of the various individual audits. The same roll up is performed on a quarterly basis as part of the quarterly trend/assessment report. Thus, the annual audit is a redundant function.

NYP&A is committed as part of its QA program to ANSI N18.7 (1972). This document requires audits of training, qualification and performance of the operations staff. This commitment continues to be met by auditing performance during the other required Technical Specification (TS) audits required by TS section 6.5.2.9. Therefore, no change to the QA program description is required as a result of the proposed TS changes.

Reference:

NYP&A letter, J. Knubel to NRC (IPN-97-051), "Proposed Technical Specification Changes Associated With SRC Audit Requirements and a Management Title Change," dated April 14, 1997.

ATTACHMENT II TO IPN-98-033

Commitments

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

Commitments Associated With IPN-98-033

Comm. No.	Commitment Description	Due Date
IPN-98-033-01	<p>In lieu of annual audits of plant staff performance, the SRC will review plant staff performance on an ongoing basis. This review will be accomplished by the following activities.</p> <ul style="list-style-type: none">• SRC will assess the plant staff performance on a continual basis as part of its oversight function conducted at each scheduled meeting.• Quality Assurance (QA) and the Operations Review Group (ORG) will prepare a quarterly trending report which identifies actual quality performance issues through the issuance of a quarterly report. This report will be distributed to all SRC members and discussed at SRC meetings.	30 days after NRC approval of this amendment request