

ATTACHMENT I TO IPN-98-073

**PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING THE
RELOCATION OF THE SRC REVIEW AND AUDIT REQUIREMENTS**

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

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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 facility activities in accordance with the Quality Assurance Program, as described in Chapter 17 of the Indian Point 3 FSAR.

AUDITS

6.5.2.9 Audits of facility activities shall be performed under the cognizance of the SRC and in accordance with the Quality Assurance Program, as described in Chapter 17 of the Indian Point 3 FSAR.

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 processed in accordance with the Quality Assurance Program, as described in Chapter 17 of the Indian Point 3 FSAR.
 - c. Audit reports encompassed by Section 6.5.2.9 above, shall be processed in accordance with the Quality Assurance Program, as described in Chapter 17 of the Indian Point 3 FSAR.

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

ATTACHMENT II TO IPN-98-073

**SAFETY EVALUATION OF
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING THE
RELOCATION OF THE SRC REVIEW AND AUDIT REQUIREMENTS**

NEW YORK POWER AUTHORITY
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**SAFETY EVALUATION FOR THE
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING THE
RELOCATION OF THE SRC REVIEW AND AUDIT REQUIREMENTS**

Section I - Description of Changes

This application for amendment seeks to revise Section 6 of Appendix A of the Indian Point 3 Technical Specifications. These changes relocate the Safety Review Committee (SRC) review, audit, and related record keeping requirements from the Technical Specifications (TS) to Chapter 17 of the Final Safety Analysis Report (FSAR) (i.e., Quality Assurance Program). The relocation of these requirements is in accordance with the guidance contained in Administrative Letter 95-06.

Section II - Evaluation of Changes

Administrative Letter 95-06 (Reference 1) was issued by the NRC staff to provide information to licensees regarding the relocation of technical specification administrative controls related to Quality Assurance from the TS to the Quality Assurance Plan. In this letter, TS requirements related to the completion of SRC reviews, audits, and record keeping were specifically targeted for relocation.

Sections 6.5.2.8, 6.5.2.9, 6.5.11.b, and 6.5.11.c of the current Indian Point 3 TS contain the requirements for SRC reviews, audits, and related record keeping. In accordance with the guidance found in Reference 1, this application removes these requirements from the TS and adds them to the Quality Assurance Program, found in Chapter 17 of the FSAR. Sections 6.5.2.8, 6.5.2.9, 6.5.11.b, and 6.5.11.c of the TS still contain the requirements for SRC to perform reviews and audits, and maintain records. However, these sections now state that the specific requirements for these functions, such as the areas to be reviewed/audited and the frequency of audits, are found in the FSAR.

A new section, Appendix E, was created in Chapter 17.2 (i.e., Quality Assurance Program) of the FSAR to include the relocated requirements. The text was reformatted to eliminate TS sections which referenced deleted material, but no changes were made to the actual requirements related to the reviews, audits, or record keeping. The Quality Assurance Program is a logical choice for the relocation of these requirements, as it is governed by controls such as Appendix B of 10 CFR Part 50, commitments to ANSI N18.7-1972, and the 10 CFR 50.54(a) change control process. Any future changes to these requirements which constitute a reduction in QA Program commitments must be submitted to the NRC for prior approval, in accordance with 10 CFR 50.54(a).

The relocation of the SRC review, audit, and record keeping requirements from the TS to the FSAR does not alter any existing requirements. These sections are being removed from the TS and relocated into the FSAR without any revisions to the areas, frequency or record keeping requirements associated with reviews and audits. Therefore, this amendment request is administrative in nature.

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:

This amendment application does not involve a significant increase in the probability or consequences of an accident previously analyzed. The relocation of the SRC review, audit, and related record keeping requirements from the TS to the FSAR does not alter the performance or frequency of these activities. Future changes to the QA program, located in Chapter 17 of the FSAR, which constitute a reduction in commitments, are governed by 10 CFR 50.54(a). Therefore, sufficient controls for these requirements exist and these changes do not involve a significant increase in the probability or consequences of an accident previously analyzed.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response:

This amendment application does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes involve the relocation of SRC requirements from the TS to the FSAR. Relocation of these requirements does not affect plant equipment or the way the plant operates. The reviews, audits, and record keeping will continue to be performed in the identical manner as they are currently being performed. Therefore, the proposed revisions cannot create a new or different kind of accident.

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

Response:

This amendment application does not involve a significant reduction in a margin of safety. The requested Technical Specification revisions relocate SRC review, audit and related record keeping requirements from the TS to the FSAR. These requirements are not being altered by this relocation. The reviews, audits, and record keeping will continue to be performed in the identical manner as they are currently being performed. Any changes to these requirements which constitute a reduction in commitments will be processed in accordance with 10 CFR 50.54(a). Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

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; and d) involves no significant hazards considerations as defined in 10 CFR 50.92.

Section VI - References

1. NRC letter, Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995.

ATTACHMENT III TO IPN-98-073

**MARK-UP OF TECHNICAL SPECIFICATION PAGES ASSOCIATED WITH
AUDIT REQUIREMENTS AND A MANAGEMENT TITLE CHANGE**

(For Information Only)

NOTE 1: Deletions are shown in ~~strikeout~~, and additions are shown in **bold**.

NOTE 2: Previous amendment revision bars are not shown.

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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 **facility activities in accordance with the Quality Assurance Program, as described in Chapter 17 of the Indian Point 3 FSAR.**

- ~~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 **and in accordance with the Quality Assurance Program, as described in Chapter 17 of the Indian Point 3 FSAR.** ~~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~~ **processed in accordance with the Quality Assurance Program, as described in Chapter 17 of the Indian Point 3 FSAR.**
- 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~~ **processed in accordance with the Quality Assurance Program, as described in Chapter 17 of the Indian Point 3 FSAR.**

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

ATTACHMENT IV TO IPN-98-073

**DESCRIPTION OF PROPOSED CHANGES TO
THE QUALITY ASSURANCE PROGRAM REGARDING THE
RELOCATION OF THE SRC REVIEW AND AUDIT REQUIREMENTS**

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**DESCRIPTION OF PROPOSED CHANGES TO
THE QUALITY ASSURANCE PROGRAM REGARDING THE
RELOCATION OF THE SRC REVIEW AND AUDIT REQUIREMENTS**

The relocation of the SRC review, audit, and related record keeping requirements from the TS to the QA Program results in changes to FSAR Section 17.2. Specifically, Appendix 17.2.E was created to include these requirements and a sentence was added to section 17.2.18 to refer to the new Appendix. These revisions to the QA Program are contained in Attachments V and VI. The relocated requirements were removed from the TS, reformatted, and placed directly in the FSAR without any change to the required reviews, audits, or related record keeping. Therefore, in accordance with 10 CFR 50.54(a), these changes do not constitute a reduction in the QA Program commitments, but are administrative changes which follow the guidance found in Administrative Letter 95-06.

ATTACHMENT V TO IPN-98-073

**PROPOSED CHANGES TO QUALITY ASSURANCE PROGRAM
REGARDING THE RELOCATION OF
THE SRC REVIEW AND AUDIT REQUIREMENTS**

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subsequently audited, consistent with the project schedule or where quality concerns are noted, so that the total program is reaudited within a scheduled period of time. The required reviews, audits, and related record keeping requirements are listed in Section 17.2, Appendix E.

Audits are performed in accordance with pre-established procedures, checklists, etc., and conducted by trained personnel not having direct responsibilities in the areas being audited.

The Authority's audit program requires audit results to be documented, reviewed by or with management responsible for the area audited, and appropriate action initiated to correct any deficiencies. The organization conducting the audit is responsible for conducting the follow-up actions including reaudit of deficient areas to assure correction of the discrepancies. Results of audits are summarized in audit reports which are reviewed by Quality Assurance.

The Authority's audit program, as defined in the Authority's Quality Assurance Program includes the following types of audits to provide a comprehensive, independent verification and evaluation of all quality related procedures and activities to assure they are in compliance with the Authority's established program requirements:

- 1) Audits of delegated organizations
- 2) Audits of selected vendors and contractors
- 3) Audits of plant operation activities
- 4) Audits internal to the Authority

Independently, or concurrent with the audits and inspections by delegated organizations, the Authority may conduct audits of vendors and contractors such as equipment fabricators, material suppliers, consultants and various contractors working on plant activities.

17.2.18.2 Authority Controls

The Director-QA, based on his review, reports audit findings and the actions to be taken to correct the deficient conditions to the VP-A&CS. These reports also serve as a source of information for the Authority's Quality Assurance Program evaluation by management.

The Authority will perform planned and periodic audits of delegated organizations and participate in audits at selected vendors' facilities to verify program implementation in accordance with approved QA Program requirements.

Appendix E

QA Reviews and Audits

17.2E.1 REVIEW

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.

17.2E.2 AUDITS

The following audits shall be performed under the cognizance of the SRC.

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.

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- 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. Any other area of facility operation considered appropriate by the SRC or the Chief Nuclear Officer.
- f. The Facility Fire Protection Program and implementing procedures at least once per two years.
- g. 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.
- h. 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.
- i. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- j. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- k. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

17.2E.3 RECORDS

- a. Reports of the reviews encompassed by 17.2E.1 shall be prepared and forwarded to the Chief Nuclear Officer within 30 days following completion of the review.
- b. Audit reports encompassed by 17.2E.2 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.

ATTACHMENT VI TO IPN-98-073

**MARKUP OF PROPOSED CHANGES
TO QUALITY ASSURANCE PROGRAM REGARDING
THE RELOCATION OF THE SRC REVIEW AND AUDIT REQUIREMENTS**

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- e. Any other area of facility operation considered appropriate by the SRC or the Chief Nuclear Officer.
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- g. 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.
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