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**James Knubel**  
Senior Vice President and  
Chief Nuclear Officer

August 17, 1998  
IPN-98-088

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

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

Dear Sir:

References 1 through 5 submitted proposed Technical Specification changes which included a revision to SRC audit requirements. This revision would allow SRC to review, rather than audit, plant staff performance. Attachment I provides the copies of the FSAR pages affected by this proposed revision.

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

Very truly yours,

A handwritten signature in dark ink, appearing to be 'J. Knubel', written over a large, stylized loop.

J. Knubel  
Senior Vice President and  
Chief Nuclear Officer

Attachments: As stated

A201/1

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- References:
1. NYPA 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.
  2. NYPA letter, J. Knubel 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.
  3. NYPA letter, J. Knubel to NRC (IPN-98-033), "Supplement to the Proposed Technical Specification Changes Associated With SRC Audit Requirements and a Management Title Change," dated March 20, 1998.
  4. NRC letter, G. Wunder to J. Knubel, "Request for Additional Information - Indian Point Nuclear Generating Unit No. 3 (TAC No. M99231)," dated April 29, 1998.
  5. NYPA letter, J. Knubel to NRC (IPN-98-057), "Response to the Request for Additional Information Regarding the Proposed Technical Specification Changes Associated With SRC Audit Requirements and a Management Title Change," dated May 18, 1998.

cc: Regional Administrator  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
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Resident Inspector's Office  
Indian Point Unit 3  
U.S. Nuclear Regulatory Commission  
P.O. Box 337  
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Mr. F. William Valentino, President  
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Mr. George Wunder, Project Manager  
Project Directorate I-1  
Division of Reactor Projects I/II  
U.S. Nuclear Regulatory Commission  
Mail Stop 14B2  
Washington, DC 20555

ATTACHMENT I TO IPN-98-088

**FSAR Revisions**

(Additions are shown in **bold**.)

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

APPENDIX 17.2B  
CONFORMANCE WITH NRC REGULATORY GUIDES

1) Personnel Selection and Training (Regulatory Guide 1.8, September 1975)

The selection and training of personnel used at the Nuclear Power Plant conform with Regulatory Guide 1.8 except for the selection and training of the Shift Technical Advisor and Operations Manager, which conform with the Technical Specifications.

2) Quality Assurance Program Requirements (Design and Construction) (Regulatory Guide 1.28, June 1972)

The design and construction of safety-related structures, systems, and components resulting from modifications or design changes are subject to quality assurance requirements that comply with the positions defined in Regulatory Guide 1.28, which endorses ANSI N45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants."

3) Quality Assurance Requirements for Installation, Inspection, and Testing of Instrumentation and Electric Equipment (Regulatory Guide 1.30, August 1972)

The installation, inspection, and testing of all IEEE Class IE electric power, instrumentation, control equipment and systems, including auxiliary equipment and associated material, comply with the requirements of Regulatory Guide 1.30.

4) Quality Assurance Program Requirements (Operation) (Regulatory Guide 1.33, November 1972)

The Quality Assurance requirements for the operation of the Nuclear Power Plant comply with Regulatory Guide 1.33 with the following exception.

**In lieu of annual audits of plant staff performance, plant staff performance will be reviewed on an ongoing basis. This review 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.**
- **QA and ORG will prepare a quarterly trending report which identifies actual quality performance issues. The scope of the trending report encompasses the review and analysis of documents such as the monthly QA summary observation 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.**

5) Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants (Regulatory Guide 1.37, March 1973)

The quality assurance requirements for cleaning of fluid systems and associated components comply with Regulatory Guide 1.37, with the following exceptions.

Regulatory Position C.3 - Safety-related systems other than the following:

- 1) Reactor coolant pressure boundary
- 2) Systems required for reactor shutdown
- 3) Systems required for emergency core cooling

Proposed Revision - August 17, 1998

17.2B-1

ATTACHMENT II TO IPN-98-088

**Commitments**

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

**Commitments Associated With IPN-98-088**

<b>Comm. No.</b>	<b>Commitment Description</b>	<b>Due Date</b>
IPN-98-088-01	Revise FSAR to include revisions to page 17.2B-1 contained in this submittal.	Next FSAR update which is issued 6 or more months after NRC approval of this submittal.