



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 59 TO FACILITY OPERATING LICENSE NO. DPR-64  
POWER AUTHORITY OF THE STATE OF NEW YORK  
INDIAN POINT NUCLEAR GENERATING UNIT NO. 3  
DOCKET NO. 50-286

Introduction

By letters dated June 4, 1982, March 8, 1983 and May 3, 1983, the Power Authority of the State of New York (the licensee) requested changes to the Technical Specifications (TS) entailing organizational changes both on-site and off-site. By letter dated June 1, 1983, in response to Generic Letter No. 82-16 regarding NUREG-0737 Technical Specifications, the licensee requested notification TSs that will require an annual summary of any changes to the pressurized power operated relief valves and (or) safety valves be submitted to the NRC. By letter dated April 4, 1984, the licensee requested to amend the TSs commensurate with Generic Letter No. 83-43 ("Reporting Requirements of 10 CFR 50, Sections 50.72 and 50.73, and Standard Technical Specifications") dated December 19, 1983 pertaining to the Licensee Event Report (LER) and emergency notification rules. The staff has reviewed the licensee's requests and the evaluation and conclusions are described below.

Discussion

A. Management Organization Changes:

By letters dated June 4, 1982, March 8, 1983 and May 3, 1983, the licensee requested changes to the TSs to reflect management organization changes both on-site and off-site.

1. The off-site management organization has been revised to add the position of First Executive Vice President and Chief Development Officer. The title of Executive Vice President, Procedures and Performance has been changed to Vice President, Quality Assurance and Reliability; he assumes the duties held previously and, in addition, now performs audits and appraisals of the security program. The title of Senior Vice President, Nuclear Generation has been changed to Executive Vice President, Nuclear Generation without a change of function; and the title of Director of Safety and Fire Protection Procedures and Performance has been changed to Director of Safety and Fire Protection. Title changes have been made throughout Section 6 to reflect the above reorganization and title changes. The reorganized off-site management organization is shown in revised Figure 6.2-1.

2. The plant staff organization chart has had a footnote added that assigns responsibility for performance and monitoring of the fire protection program. Additionally, the title of Training Coordinator has been changed to reflect the current organization structure. This is shown in Figure 6.2-2.
3. In Section 6.5.2.8, the audit frequencies for emergency preparedness and safeguards contingency plans (Items e and f) have been revised to agree with 10 CFR 50.54(t) and 73.40(d), respectively.

The changes in Item 1 and 2 above do not delete any functions previously performed by the organizations, and do not appear to decrease the effectiveness of the organizations involved. In addition, the proposed changes meet the guidance of Section 13.1 of the Standard Review Plan, NUREG-0800, and Regulatory Guide 1.33. Therefore, the proposed changes are acceptable.

The changes described in Item 3 above make the TS congruent with the Regulations; therefore, they are acceptable.

#### B. Reporting of SV and RV Failures and Challenges

By letter dated September 20, 1982 (Generic Letter No. 82-16), the NRC staff requested all pressurized water reactor licensees to submit an application for a license amendment for certain identified items described in NUREG-0737, "Clarification of TMI Action Plan Requirements", for which TSs are required. Specifically, for Item II.K.3.3 of NUREG-0737, licensees were requested to submit proposed TSs consistent with model TSs provided in an enclosure to that letter.

The model TSs would require that: (1) annual reports include documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves, and (2) prompt notification with written follow-up of all events involving failure of the pressurizer PORVs or safety valves. The licensee's letter of June 1, 1983 included proposed TSs that would require: (1) a summary of any challenges to pressurizer PORVs or safety valves to be submitted annually, and (2) prompt reporting of PORV or safety valve failure to function when called upon to operate during plant operations.

To be consistent with the recently issued LER rule (10 CFR 50.72 and 50.73), the licensee's submittal, dated April 3, 1984, deleted Section 6.9.1.7 (Prompt Notification With Written Followup). The prompt reporting of PORV or safety valve failures is now required in the LER rule. The licensee's proposed changes are consistent with the intent of the NRC model TS reporting requirements and are considered acceptable.

C. Reporting Requirements to Conform to 10 CFR 50.72 and 50.73

By letter dated April 3, 1984, the licensee proposed changes to revise notification and reporting requirements, as requested by NRC Generic Letter 83-43 dated December 19, 1983, to be consistent with the new requirements in 10 CFR Parts 50.72 and 50.73.

Currently, Administrative Controls Specification 6.9.1.6, "Reportable Occurrences" and Specifications 6.9.1.7 and 6.9.1.8 require the licensee to report certain types of events either by prompt notification with written followup or in thirty day written reports. The proposed revisions, which bring the Indian Point Unit No. 3 TSs in conformance with new requirements in 10 CFR Parts 50.72 and 50.73, include adding Definition 1.16, "Reportable Events," and revising the Administrative Controls sections to reference 10 CFR Part 50.73 and to delete the previous reporting requirements for Reportable Occurrences, now unnecessary or conflicting.

The staff has evaluated the proposed changes to the TSs and concludes that these changes are administrative and do not involve any physical change to the plant's safety-related structures, systems or components. Further, these changes do not increase the likelihood of a malfunction of safety-related equipment, or increase the consequences of an accident previously analyzed or create the possibility of a malfunction different from those previously evaluated. Therefore, based on the above, the staff finds the licensee requested changes to revise event reporting requirements to be acceptable.

D. Editorial Changes

Two editorial changes have been requested and discussed with the staff by the licensee:

1. Page iii of the index has been revised to reflect page reordering corresponding to the previously discussed changes.
2. The Special Reports section (Specification 6.9.2) lists activities for which special reports shall be submitted to the Regional Administrator - Region I. These activities reference the requirements of its applicable TS. The references to the applicable TS have been revised so that if no appendix section is mentioned, the TS is assumed to be in the Appendix A.

These editorial changes are administrative and are included to achieve consistency throughout the TSs and are, therefore, acceptable.

Environmental Consideration

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents

that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Sec 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

#### Conclusion

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: July 1, 1985

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