

ATTACHMENT A

APPLICATION FOR AMENDMENT  
TO OPERATING LICENSES

Technical Specification  
Page Revisions

Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 1  
Docket No. 50-3  
March, 1981

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### 3.0 Administrative and Procedural Safeguards

#### 3.1 Organization

3.1.1 The organization for facility management and technical support shall be as shown in Figure 3.1.

3.1.2 The Facility Organization shall be as shown in Figure 3.2. The Support Facilities Supervisor is responsible for operations at the Unit No. 1 facility.

3.1.3 The Vice President-Nuclear Power shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

3.1.3.1 The General Manager-Nuclear Power Generation shall be responsible for facility operations and shall delegate in writing the succession to this responsibility during his absence.

3.1.4 The operation of the facility, the operating organization, the procedures for operation, and modifications to the facility shall be subject to review by the Station Nuclear Safety Committee. The committee shall report to the Vice President-Nuclear Power.

3.1.5 The Nuclear Facilities Safety Committee shall function to provide independent review and audit of designated activities in areas of nuclear engineering, chemistry, radiochemistry, metallurgy and non-destructive testing, instrumentation and control, radiological safety, mechanical and electrical engineering, administrative controls and quality assurance practices, and radiological environmental effects.

3.1.6 All fuel handling shall be under the direct supervision of a licensed operator.\*

#### 3.2 Operating Instructions and Procedures

3.2.1 No fuel will be loaded into the reactor core or moved into the reactor containment building without prior review and authorization by the Nuclear Regulatory Commission.

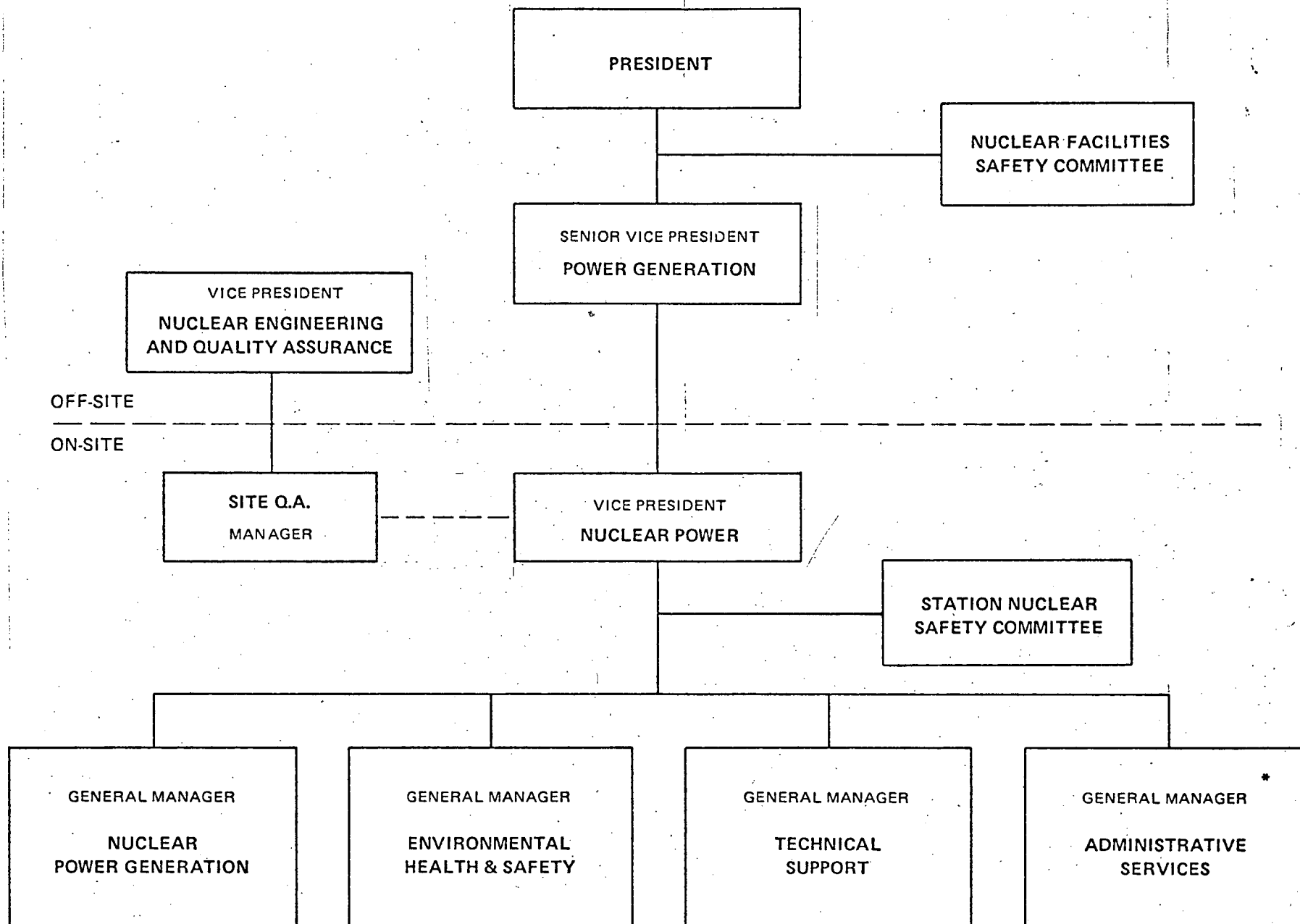
3.2.2 Detailed written instructions setting forth procedures used in connection with the operation and maintenance of the nuclear power plant shall conform to the Technical Specifications.

3.2.3 Operation and maintenance of equipment related to safety when there is no fuel in the reactor shall be in accordance with written instructions.

3.2.6 Radiation control procedures shall be maintained and made available to all station personnel. Station operation shall adhere to these procedures. These procedures show permissible radiation exposure, and shall be consistent with the requirements of 10CFR20. The radiation protection program shall be organized to meet the requirements of 10CFR20.

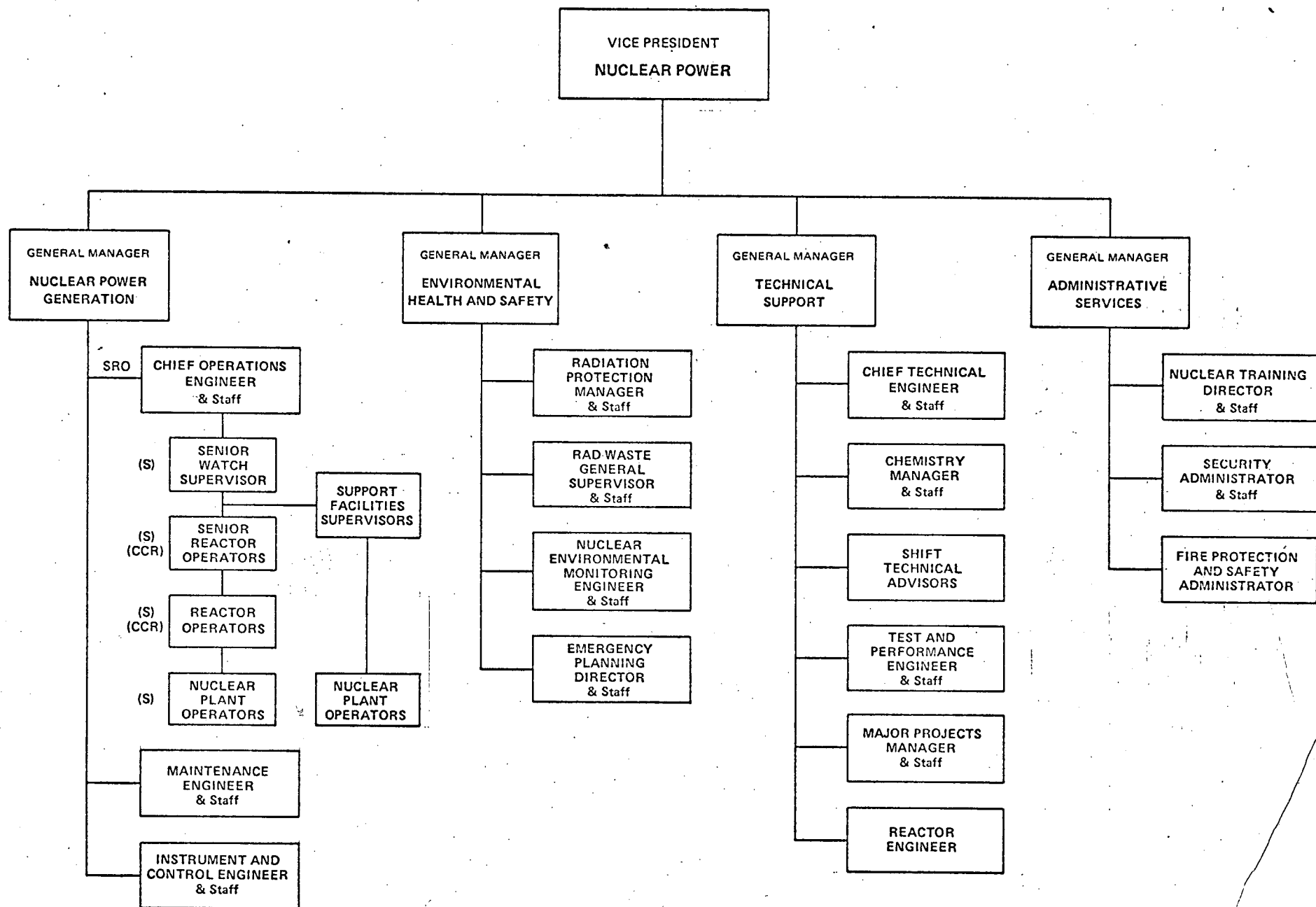
\*Licensed operator for IP-1 or IP-2.

Amendment No.



\*Responsible for the performance and monitoring of the Fire Protection Program

Figure 3.1 Facility Management and Technical Support Organization



(CCR) - Central Control Room Position  
(S) - Continuous Shift Coverage

Figure 3.2 Facility Organization

ATTACHMENT B

APPLICATION FOR AMENDMENT  
TO OPERATING LICENSES

Technical Specification  
Page Revisions

Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247  
March, 1981

## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The Vice President-Nuclear Power shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The General Manager-Nuclear Power Generation shall be responsible for facility operations and shall delegate in writing the succession to this responsibility during his absence.

### 6.2 ORGANIZATION

#### FACILITY MANAGEMENT AND TECHNICAL SUPPORT

6.2.1 The organization for facility management and technical support shall be as shown on Figure 6.2-1.

#### FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown, and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling. This individual shall have no other concurrent responsibilities during this operation.
- f. A Fire Brigade of at least five members shall be maintained on site at all times\*. This excludes four members of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency. During periods of cold shutdown, the Fire Brigade will exclude two members of the minimum shift crew.

\*Fire Brigade composition may be one member less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to within the minimum requirements.

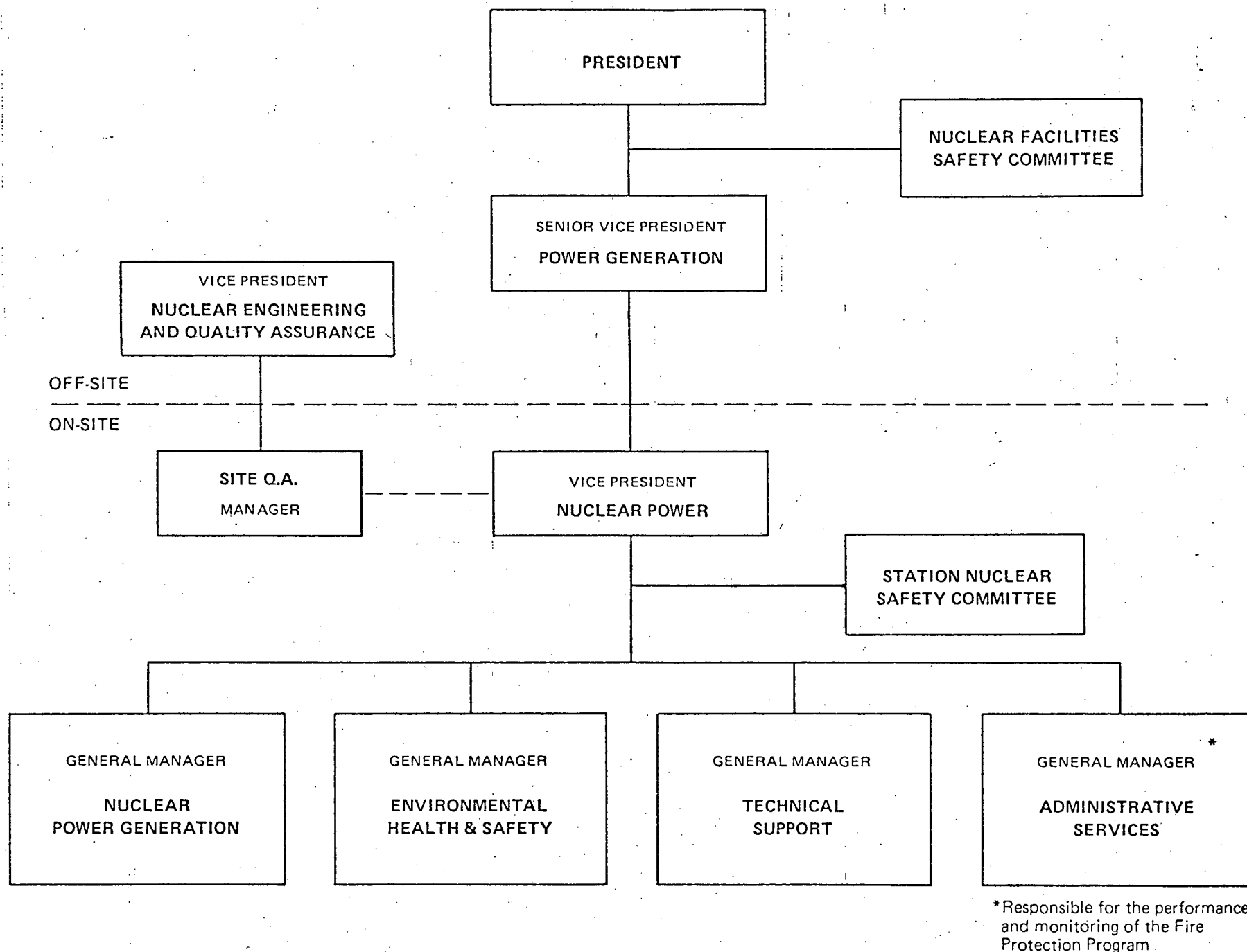
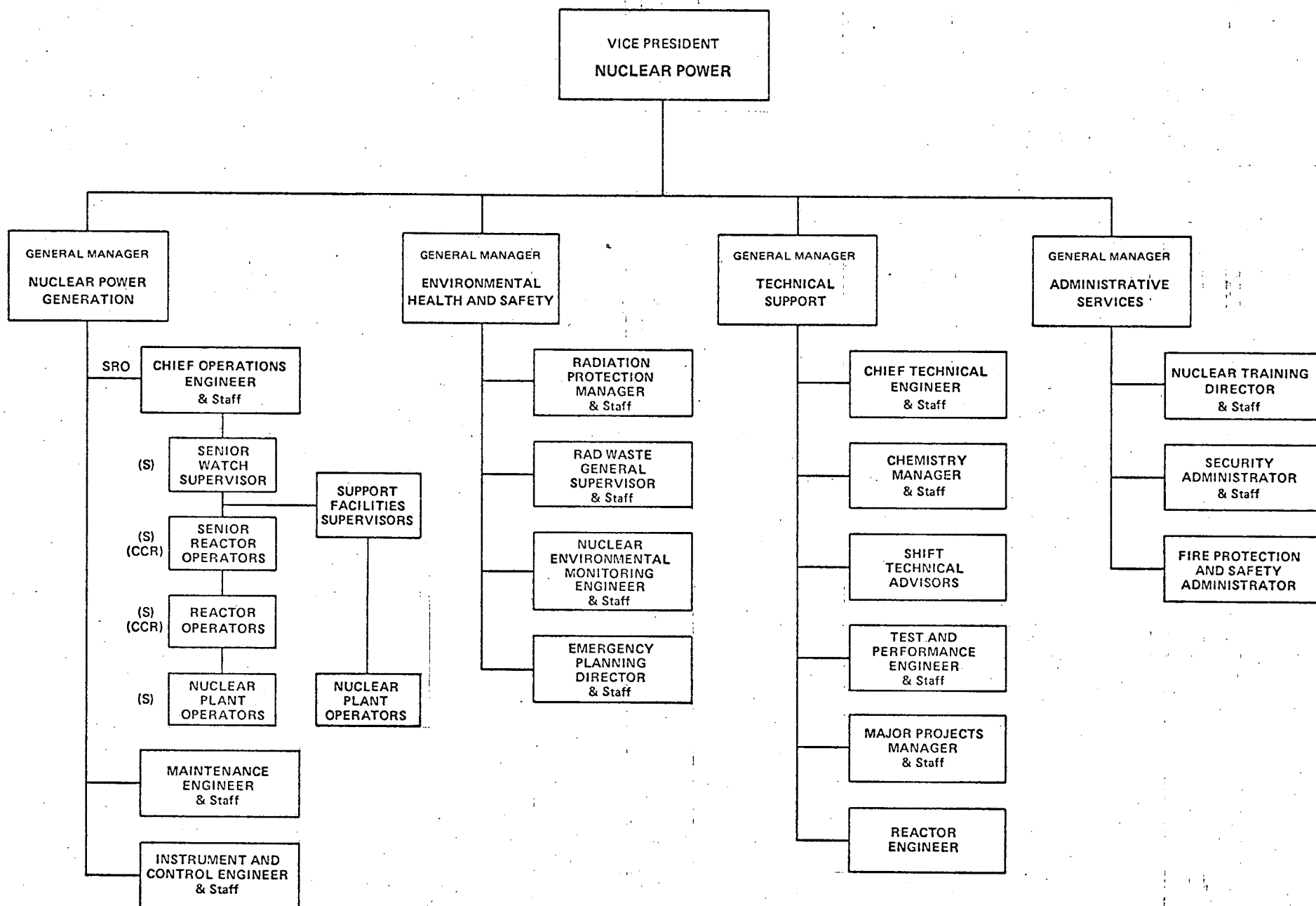


Figure 6.2-1 Facility Management and Technical Support Organization



(CCR)- Central Control Room Position  
(S) - Continuous Shift Coverage

Figure 6.2-2 Facility Organization



Minimum Shift Crew Composition\*\*

License Category	During Operations Involving Core Alterations	During Cold Shutdown or Refueling Periods	At All Other Times
Senior Operator License	2*	1	1
Operator License	1	1	2
Non-Licensed	(As Required)	1	2
Shift Technical Advisor (STA)	1	(None Required)	1

\*Includes individual with SRO license supervising fuel movement as per Section 6.2.2(e).

\*\*Shift crew composition may be one less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.

### 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiation Protection Manager who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975.

6.3.2 The General Manager-Nuclear Power Generation shall meet or exceed the minimum qualifications specified for Plant Manager in ANSI N18.1-1971.

6.3.3 The Shift Technical Advisor (STA) shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

### 6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Director and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Nuclear Training Director and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976 with the exception of the training program schedule.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 STATION NUCLEAR SAFETY COMMITTEE (SNSC)

##### FUNCTION

6.5.1.1 The Station-Nuclear Safety Committee shall function to advise the Vice President-Nuclear Power on all matters related to nuclear safety.

##### COMPOSITION

6.5.1.2 The Station Nuclear Safety Committee shall, as a minimum, be composed as follows:

Chairman:	General Manager-Technical Support
Member:	General Manager-Nuclear Power Generation
Member:	General Manager-Administrative Services
Member:	General Manager-Environmental Health & Safety
Member:	Technical Consultant
Member:	Chief Operations Engineer
Member:	Maintenance Engineer
Member:	Instrument and Control Engineer
Member:	Test and Performance Engineer
Member:	Major Projects Manager
Member:	Reactor Engineer
Member:	Security Administrator
Member:	Site Q.A. Manager (Q.A. Dept.)
Member:	Principal Field Engineer (Eng. Dept.)

6.5.1.2.1 In addition, other technically competent individuals may be appointed by the SNSC Chairman to serve as SNSC members.

## ALTERNATES

6.5.1.3 Alternate members shall be appointed in writing by the SNSC Chairman to serve on a temporary basis.

## MEETING FREQUENCY

6.5.1.4 The SNSC shall meet at least once per calendar month and as convened by the SNSC Chairman.

## QUORUM

6.5.1.5 A quorum of the SNSC shall consist of the Chairman or Vice Chairman and a majority of the committee members including no more than two alternates.

## RESPONSIBILITIES

6.5.1.6 The Station Nuclear Safety Committee shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, and 2) any other proposed procedures or changes thereto as determined by the General Manager-Technical Support to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications and preparation and forwarding of a report covering evaluation and recommendations to prevent recurrence to the Vice President-Nuclear Power and to the Chairman of the Nuclear Facilities Safety Committee.
- f. Review of facility operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and the issuance of reports thereon as required by the Chairman of the Nuclear Facilities Safety Committee.
- h. Review of the Plant Security Plan and implementing procedures and submission of recommended changes to the Chairman of the Nuclear Facilities Safety Committee.
- i. Review of the Emergency Plan and implementing procedures and submission of recommended changes to the Chairman of the Nuclear Facilities Safety Committee.

## AUTHORITY

### 6.5.1.7 The Station Nuclear Safety Committee shall:

- a. Recommend to the Vice President-Nuclear Power in writing, approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide immediate written notification to the Chairman, Nuclear Facilities Safety Committee of disagreement between the recommendations of the SNSC and the actions contemplated onsite. However, the course of action determined by the Vice President-Nuclear Power pursuant to 6.1.1 above or the General Manager-Nuclear Power Generation pursuant to 6.1.2 above shall be followed.

## RECORDS

6.5.1.8 The Station Nuclear Safety Committee shall maintain written minutes of each meeting and copies shall be provided to, as a minimum, the Vice President-Nuclear Power and the Chairman, Nuclear Facilities Safety Committee.

### 6.5.2 NUCLEAR FACILITIES SAFETY COMMITTEE (NFSC)

## FUNCTION

6.5.2.1 The Nuclear Facilities Safety Committee shall function to provide independent review and audit of designated activities in the areas of:

- a. reactor operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy and non-destructive testing
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. administrative controls and quality assurance practices
- i. radiological environmental effects
- j. other appropriate fields associated with the unique characteristics of the nuclear power plant

## COMPOSITION

6.5.2.2 The Committee shall have a permanent voting membership of at least 5 persons of which a majority are independent of the Nuclear Power Organization and shall include technically competent persons from departments of Consolidated Edison having a direct interest in nuclear plant design, construction, operation or in nuclear safety. In addition, persons from departments not having a direct interest in nuclear plant design, construction, operation or nuclear safety may serve as members of the Committee if experienced in the field of nuclear energy. The Chairman and Vice Chairman will be Senior Officials of the Company experienced in the field of nuclear energy.

The Chairman of the Nuclear Facilities Safety Committee, hereafter referred to as the Chairman, shall be appointed by the Chairman of the Board or the President of the Company.

The Vice Chairman shall be appointed by the Chairman of the Board or the President of the Company. In the absence of the Chairman, he will serve as Chairman.

The Secretary shall be appointed by the Chairman of the Committee.

Committee members from departments having a direct interest in nuclear plant design, construction and operation or in nuclear safety shall be designated by the Vice President of the Company who is responsible for the functioning of the department subject to the approval of the Chairman. Committee members from other departments may be appointed by the Chairman with the concurrence of the Vice President of that department.

## ALTERNATES

6.5.2.3 Each permanent voting member, subject to the Chairman's approval, may appoint an alternate to serve in his absence. Committee records shall be maintained showing each such current designation.

No more than two alternates shall participate in activities at any one time.

Alternate members shall have voting rights.

## CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NFSC Chairman.

## MEETING FREQUENCY

6.5.2.5 The NFSC shall meet at least once per calendar quarter or at more frequent intervals at the call of the Chairman or, in his absence, the Vice Chairman.

## QUORUM

6.5.2.6 A majority of the permanent voting committee members, or duly appointed alternates, which shall include the Chairman or the Vice Chairman and of which a minority are from the Nuclear Power Organization shall constitute a quorum for meetings of the committee. In the event both the Chairman and the Vice Chairman are absent, one of the permanent voting members will serve as Acting Chairman.

## REVIEW

6.5.2.7 The following subjects shall be reported to and reviewed by the Committee insofar as they relate to matters of nuclear safety:

- 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, 10 CFR, 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 in Technical Specifications or licenses.
- e. Violations of applicable statutes, 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.

## 6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken in the event of a Reportable Occurrence:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specifications 6.9.1.7.1 and/or 6.9.1.7.2.
- b. Each Reportable Occurrence Report submitted to the Commission shall be reviewed by the SNSC and submitted to the NFSC Chairman, and the Vice President-Nuclear Power.

## 6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit Violation shall be reported to the Commission, the Vice President-Nuclear Power and to the NFSC Chairman immediately.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NFSC Chairman and the Vice President-Nuclear Power within 10 days of the violation.

## 6.8 PROCEDURES

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USAEC Regulatory Guide 1.33 (issued November 1972) except as provided in 6.8.2 and 6.8.3 below.

6.8.2 Each procedure and administrative policy of 6.8.1 above, and any changes to them shall be reviewed and approved for implementation in accordance with a written administrative control procedure approved by the appropriate General Manager, with the concurrence of the Station Nuclear Safety Committee and the Nuclear Facilities Safety Committee. The administrative control procedure required by this specification shall, as a minimum, require that:

- a. Each proposed procedure/procedure change involving safety related components and/or operation of same receives a pre-implementation review by the SNSC except in case of an emergency.
- b. Each proposed procedure/procedure change which renders or may render the Final Safety Analysis Report or subsequent safety analysis reports inaccurate and those which involve or may involve potential unreviewed safety questions are approved by the SNSC prior to implementation.
- c. The approval of the Nuclear Facilities Safety Committee shall be sought if, following its review, the Station Nuclear Safety Committee finds that the proposed procedure/procedure change either involves an unreviewed safety question or if it is in doubt as to whether or not an unreviewed safety question is involved.

6.8.3 A mechanism shall exist for making temporary changes and they shall only be made by approved management personnel in accordance with the requirements of ANSI 18.7-1972. The change shall be documented, and reviewed by the SNSC within 7 days of implementation.

## 6.9 REPORTING REQUIREMENTS

### ROUTINE REPORTS AND REPORTABLE OCCURRENCES

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Region I Office of Inspection and Enforcement unless otherwise noted.



ATTACHMENT C

APPLICATION FOR AMENDMENT  
TO OPERATING LICENSES

Safety Evaluation

Consolidated Edison Company of New York, Inc.  
Indian Point Unit Nos. 1 & 2  
Docket Nos. 50-3 & 50-247  
March, 1981

## Safety Evaluation

The proposed technical specification revisions, contained in Attachments A and B to this Application, would effect certain organizational and administrative changes relative to facility management and technical support and to the facility organization. The proposed changes to section 3.1 of the Indian Point Unit No. 1 Technical Specifications (Attachment A) and to Sections 6.1, 6.2, 6.3, 6.5, 6.6, 6.7 and 6.8 of the Indian Point Unit No. 2 Technical Specifications (Attachment B) would require that: (a) the Vice President-Nuclear Power be responsible for overall facility safety and the General Manager-Nuclear Power Generation be responsible for facility operations, (b) the Station Nuclear Safety Committee (SNSC) be chaired by the General Manager-Technical Support and that SNSC report to and advise the Vice President-Nuclear Power, and (c) the facility be managed and operated in accordance with the pending organizational changes reflected on revised Figures 6.2-1 and 6.2-2 and in specification 6.5.1.2. In addition, requirements for the Shift Technical Advisor (STA) have been proposed for Sections 6.2 and 6.3 of the Unit No. 2 Technical Specifications.

The proposed changes do not in any way alter the safety analyses performed for Indian Point Unit Nos. 1 or 2. The proposed changes have been reviewed by the Station Nuclear Safety Committee and the Consolidated Edison Nuclear Facilities Safety Committee. Both committees concur that these changes do not represent a significant hazards consideration and will not cause any change in the types or an increase in amounts of effluents or any change in the authorized power level of the facilities.