# ATTACHMENT A

TECHNICAL SPECIFICATION PAGE REVISIONS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. INDIAN POINT UNIT NO. 2 DOCKET NO. 50-247 APRIL, 1993

9304140006 930401 PDR ADDCK 050002

05000247 PDR

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 nucléar 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 Executive Vice President, Central Operations.

6-8

The Vice Chairman shall be appointed by the Executive Vice President, Central Operations. 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.

## <u>Alternates</u>

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.

- f. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- g. The Facility Security Plan and implementing procedures at least once per 12 months.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. A fire protection and loss prevention inspection and audit shall be performed utilizing either qualified offsite licensee personnel or an outside fire protection firm at least once per 12 months.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at least once per 36 months.
- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- 1. The Offsite Dose Calculations 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.
- n. The performance of activities required by the Quality Assurance
  Program to meet the provisions of Regulatory Guide 1.21, Revision
  1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at
  least once per 12 months.
- Any other area of facility operation considered appropriate by the NFSC or the Executive Vice President, Central Operations.

## <u>Authority</u>

6.5.2.9 The NFSC shall report to and advise the Executive Vice President,Central Operations on those areas of responsibility in Specifications6.5.2.7 and 6.5.2.8.

#### <u>Records</u>

- 6.5.2.10 Records of NFSC activities shall be prepared, approved and distributed as indicated below:
  - a. Minutes of each NFSC meeting shall be prepared, approved and forwarded to the Executive Vice President, Central Operations and to Senior Company Officers concerned with nuclear facilities within 14 days following each meeting.
  - b. Reports of reviews encompassed by Specifications 6.5.2.7 e, f, g and h above, shall be prepared, approved and forwarded to the Executive Vice President, Central Operations and to Senior Company Officers concerned with nuclear facilities within 14 days following completion of the review.
  - c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the Senior Company Officers concerned with nuclear facilities and to the management positions responsible for the areas audited within 30 days after completion of the audit.

## 6.6 REPORTABLE EVENT ACTION

6.6.0 A Reportable Event is defined as any of the conditions specified in 10 CFR 50.73a(2).

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

6-13

- 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.
- b. Process Control Program implementation.
- c. Offsite Dose Calculation Manual implementation.
- d. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Revision 1, April 1974 and Regulatory Guide 4.1, Revision 1, April 1975.
- 6.8.2 Each procedure and administrative policy of Specification 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 Vice President, Nuclear Power. 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 Updated 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.

6-15

## ATTACHMENT B

- 4,

.. .  $\langle \cdot \rangle$ 

SAFETY ASSESSMENT AND BASIS FOR NO SIGNIFICANT HAZARDS DETERMINATION

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. INDIAN POINT UNIT NO. 2 DOCKET NO. 50-247 APRIL, 1993

.



Page 1 of 2

April, 1993 Indian Point Unit No. 2

## Description of Change

Technical Specification 6.5.2.9 states that the Nuclear Facilities Safety Committee (NFSC) shall report to and advise the President of the Company on its areas of responsibility. Technical Specification 6.5.2.2 specified that the Chairman and the Vice Chairman of the NFSC shall be appointed by the Chairman of the Board or the President of the Company. Technical Specification 6.5.2.10.a and 6.5.2.10.b require that meeting minutes and reports of reviews by the NFSC be prepared, approved and forwarded to the President of the Company. Technical Specification 6.5.2.8.o states that audits of facility operations shall include those considered appropriate by the President of the Company.

It is proposed that the reporting relationship described above be changed to the Executive Vice President, Central Operations rather than the President of the Company and/or the Chairman of the Board. The Executive Vice President, Central Operations reports directly to the President of the Company. This officer has responsibility for all aspects of nuclear power generation within the company, including Nuclear Power, Engineering and Construction. This change maintains a consistent level of oversight of the NFSC while continuing to ensure its independence and technical experience.

Technical Specification 6.8.2 states that the administrative control procedure which describes the policy for changing, reviewing and approving procedures be approved by the appropriate General Manager with the concurrence of the Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee. It is proposed that the requirement for NFSC concurrence with the administrative control procedure be eliminated and a requirement for the Vice President, Nuclear Power to provide concurrence be added. SNSC and Vice President, Nuclear Power concurrence with this procedure provides sufficient oversight.

# Basis For No Significant Hazards Consideration Determination

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

This is an administrative change which is being proposed at the convenience of the Company. Since this change maintains a consistent level of oversight while continuing to ensure the independence and technical experience of NFSC and since the SNSC and Vice President, Nuclear Power concurrence with the administrative control procedure provides sufficient oversight of this procedure, this change does not increase the probability or consequences of an accident. Page 2 of 2

April, 1993 Indian Point Unit No. 2

2. The possibility of a new or different kind of accident from any previously evaluated has not been created.

This is an administrative change of the reporting relationship for NFSC which does not significantly decrease the level of upper management to which NFSC reports. The concurrence by SNSC and the Vice President, Nuclear Power of the administrative control procedure provides sufficient oversight.

3. There has been no reduction in the margin of safety.

The independence and technical experience of the NFSC will be preserved. This change is consistent with the requirements of American National Standard ANSI N18.7-1972 "Administrative Controls for Nuclear Power Plants."