

U.S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

NOTICE  
15 FEB 1978

AS OF  
REGION I HAS NOT OBTAINED PROPRIETARY  
CLEARANCE IN ACCORDANCE WITH 10 CFR 27.90

Report No. 50-03/78-01  
50-247/78-01  
50-286/78-02

Docket No. 50-03  
50-247  
50-286

License No. DPR-5  
DPR-26  
DPR-64

Priority --

Category D  
C  
C

Licensee: Consolidated Edison Company of New York, Inc. (Con Ed)

4 Irving Place

New York, New York 10003

Facility Name: Indian Point Nuclear Generating Units (IP) 1, 2, and 3

Inspection at: Indian Point Nuclear Generating Units 1, 2, and 3, Buchanan, New York  
and Corporate Offices of Consolidated Edison Company of New York, Inc.  
and Power Authority of the State of New York (PASNY)

Inspection conducted: January 10, 11, and 19, 1978

Inspectors: Robert J. Bores  
Robert J. Bores, Radiation Specialist

02-10-78  
date signed

for Robert J. Bores  
Dale E. Donaldson, Radiation Specialist

02-10-78  
date signed

Approved by: J. P. Stohr  
J. P. Stohr, Chief, Environmental Protection  
and Special Projects Section, FF&MS Branch

date signed  
2/10/78  
date signed

Inspection Summary:

Inspection on January 10, 11 and 19, 1978 (Combined Inspection Report Nos. 50-03/78-01;  
50-247/78-01; and 50-286/78-02)

Areas Inspected: Special, announced inspection of the environmental protection program (operational phase) and of the emergency planning program (operational phase). The inspection was limited to the followup of previously identified enforcement items and unresolved items, to the preparedness of PASNY to take over the operation of IP-Unit 3, and to the agreements/understandings between Con Ed and PASNY concerning the operation of Unit 3 within common site requirements. Environmental areas inspected include management controls for this program and the implementation of the radiological environmental monitoring program. Emergency planning areas inspected include the management and administrative controls for emergency facilities and equipment, coordination with offsite agencies, emergency plan training, drills, and PASNY-Con Ed material support agreements. The inspection involved 19 onsite inspector-hours by two NRC inspectors.

Results: Within the scope of this inspection, no items of noncompliance were identified.

Region I Form 12  
(Rev. April 77)

## DETAILS

### 1. Individuals Contacted

#### Consolidated Edison Company of New York, Inc. (Con Ed)

W. Cahill, Jr., Vice President - Licensing  
J. Jannarone, Vice President - Environmental Affairs; Chairman  
of Environmental Protection Committee (EPC)  
\*A. Cheifetz, Sr. Engineer - Environmental, Nuclear and Gas Testing  
Group  
\*M. Smith, Secretary of the EPC  
\*J. Szeligowski, Emissions Control Engineer; Past Secretary of EPC  
\*N. Hartman, Consultant, Quality Standards & Reliability (QS&R)  
E. Sack, Law Department  
A. Ferraro, Staff Engineer  
+T. Law, Plant Manager, IP  
\*C. Limoges, Reactor Engineer, IP  
+G. Liebler, Senior Engineer, IP

#### Power Authority of the State of New York (PASNY)

\*J. Blake, Director - Environmental Programs  
S. Farber, Radiological Engineer  
J. Davis, Chief, Nuclear Engineer - Staff  
+S. Cantone, Superintendent of Power, IP  
+J. Bayne, Resident Manager, IP  
+\*J. Kelly, Radiological and Environmental Services (RES)  
Superintendent, IP  
+S. Dodge, Asst. to RES Superintendent, IP  
D. Quinn, Radiological Engineer, IP

\*denotes those present at exit interview on January 11, 1978 at Con Ed Corporate Offices.

+denotes those present at exit interview on January 19, 1978 at IP.

### 2. Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (77-14-01; 77-33-01; 77-31-01) Failure to have properly approved procedures. The inspector determined through a review of selected procedures, review of EPC meeting minutes, and

discussions with licensee representatives, that the procedures identified during previous inspections of this area have been reviewed and approved. The inspector also determined that the additional procedures, which were identified by the licensee's management control system and reported to the NRC in a letter dated December 15, 1977, were being completed and reviewed in accord with the licensee's reported commitment dates. The inspector had no further questions in this area at this time.

(Closed) Noncompliance (77-14-02; 77-33-02; 77-31-02) Failure to follow procedures. The inspector determined through the review of the licensee's Environmental Quality Control Program, Procedure NEM-AD-08 and the implementing procedure, NEM-A -03; discussions with the licensee; and the review of samples collected and split, that the above procedures had been implemented by January 1, 1978. The inspector had no further questions in this area at this time.

(Open) Unresolved Item (286/77-31-06) Analytical Sensitivities for Sr-89, Sr-90 and I-131. The inspector determined through discussions with the licensee and a survey of the records provided, that the licensee has received the work sheets/data sheets from the contractor from which verification of analytical sensitivities can be made. The licensee stated that his review of this data is not yet complete. The inspector stated that this item would remain unresolved pending the completion of the licensee's review and evaluation of these records, and the review of this area by the NRC during a subsequent inspection.

### 3. Environmental Monitoring

#### a. Con Ed Management Controls

The licensee stated that Mr. S. Sadlon is now the supervisor of the Nuclear Environmental Monitoring (NEM) program at Indian Point, replacing Mr. L. Volpe. The inspector discussed with the licensee the special training to be provided for this position.

The inspector determined through discussions with the licensee and through the review of applicable records and working papers, that the licensee has completed a "Master List" of procedures necessary to comply with the Environmental Technical Specification Requirements (ETSR) for Indian Point Units

1, 2 and 3. The EPC is in the process of assembling a complete file copy of Master List Procedures at the present time and has committed to a completion schedule to assure timely completion of this task.

The inspector also determined that in order to assure that (1) all environmental samples (radiological) are collected at the required frequency, (2) all required radiological analyses are performed, (3) all radioanalytical sensitivities meet the requirements, and (4) anomalous or unusual results are "flagged" for resolution or reporting, a computer program containing these essential environmental monitoring program elements has been developed and is currently in the "de-bugging" stages. The above program has been implemented in the interim through administrative review requirements.

The inspector had no further questions in the above areas at this time.

b. Readiness of PASNY to Assume Operations of Unit 3 Environmental

The inspector discussed with PASNY personnel the PASNY organization and administrative controls relative to the environmental programs for Indian Point Unit 3. The inspector determined (1) the authorities and responsibilities for conducting these programs have been assigned as stated in the PASNY proposed Section 5.0 of the ETSR, (2) assurance of quality of analytical work will be made through the use of frequent reviews of the Con Ed quality control program, (3) provisions for review of the environmental programs by Plant Operating Review Committee (PORC), including ETSR procedures and/or changes therein, have been made, and (4) periodic audits will be performed by the Safety Review Committee (SRC), although the details of these audits have not yet been fully developed.

The inspector also discussed several modifications/clarifications to the wording in the PASNY proposed ETSR. PASNY representatives stated that they would evaluate and clarify these areas.

The inspector stated that he had no additional questions relative to the PASNY administrative controls on the environmental programs for IP-3 at this time.

c. Con Ed - PASNY Coordination on Site Related Environmental Matters

For purposes of assuring coordination and understandings between the two organizations regarding site facilities, services, systems, regulatory restrictions, and responsibilities, Con Ed and PASNY have prepared memoranda of understanding relative to each identified area. The inspector reviewed the memoranda of understanding concerning the following areas: the discharge canal, outfall structure and associated instrumentation and sampling; the operation and maintenance of the common sewage treatment facility; the chlorination system; the transmittal of operating information between Con Ed and PASNY; the operation and maintenance of the meteorology tower; the receipt, processing and discharge of liquid waste; actions to be taken in the event a site limit is exceeded; environmental monitoring services; and the apportionment of fish impingement limits and actions to be taken.

The memoranda of understanding were discussed with Con Ed and PASNY representatives, along with plans for assuring that procedures, or changes thereto, which may affect site limits or which concern site monitoring programs are brought to the attention of the appropriate organization such that the review/approval of these changes/procedures can be made in accord with the respective ETSR.

The utility representatives stated that coordination in these matters would be maintained through the use of cross-membership on the EPC, NFSC, and PORC. In this manner, items relative to site programs will be brought to the attention of both utilities and can be acted on by their respective committees.

The inspector also discussed the coordination between the various committees relative to resolving conflicts, if any, concerning procedures, reports, limits, or ETSR. While a

formal mechanism has not been established to handle such situations, at present, the utility representatives stated that the general concept for handling this situation has been discussed and will be resolved, as necessary, to continue operation in compliance with the ETSR.

The conduct of audits of site environmental activities, the distribution of such audit reports and response to audit identified deficiencies were also discussed with Con Ed and PASNY representatives. While the details of such activities were not complete, there was mutual consent as to the general policy and directions in this area.

The inspector stated that contingent on the understandings reached between Con Ed and PASNY concerning the conduct of the environmental monitoring programs at the Indian Point site, he had no further questions in these areas at this time.

#### 4. Emergency Planning

##### a. General

During this portion of the inspection the inspector reviewed the proposed emergency planning program intended for implementation at the Indian Point 3 facility upon transfer of the operating license for Unit 3 from Consolidated Edison to the Power Authority of the State of New York (PASNY). In this regard, the inspector reviewed management and administrative controls and actions relating to: emergency facilities and equipment; coordination with offsite agencies; emergency plan training; drills; and PASNY-Consolidated Edison Mutual Support Agreements.

##### b. Emergency Plan and Implementing Procedures

PASNY has developed an emergency plan titled, "Emergency Plan, Indian Point 3 Nuclear Power Plant," dated April 1, 1977. This plan closely resembles the current emergency plan implemented by Consolidated Edison for the Indian Point Units 1 and 2 and incorporates appropriate revisions to reflect the PASNY organization.



While each licensee (PASNY and Con Ed) has a separate emergency plan, the procedures to be implemented in the event of an emergency will remain common to both licensees. Through discussion with PASNY and Consolidated Edison management personnel and a review of PASNY Memorandum of Understanding (MOU) Number 28, "Rules Governing the Implementation of the Emergency Plan at the Indian Plant Site," the inspector observed that consideration had not been given to dual licensee review and approval of procedures and any changes thereto. Representatives of both licensee organizations acknowledged the importance of dual review and stated that an appropriate reference to dual review would be added to MOU Number 28 prior to the licensee transfer. Subsequent to completion of the onsite portion of the inspection, the licensee provided the inspector with a revised copy of MOU Number 28, dated 1/23/78. The inspector noted that the document addressed dual review/approval of common emergency plan implementing procedures.

With regard to distribution of implementing procedures, it has been agreed that Consolidated Edison will continue distribution of all common procedures to offsite support agencies. In addition, Consolidated Edison will provide one copy of changes to the PASNY Site Emergency Plan Coordinator who will, in turn, distribute changes within the PASNY organization.

The inspector had no further questions.

c. Coordination with Offsite Agencies

Discussion with PASNY and Consolidated Edison management indicated that offsite agency coordination activities, i.e., training, meetings, etc., will be accomplished via joint effort on the part of the licensees. Licensee management representatives agreed that this understanding should be clarified through revision of PASNY MOU Number 28, prior to license transfer. Subsequent to completion of the onsite portion of the inspection, the licensee provided the inspector with a revised copy of MOU Number 28 (paragraph 4.b). The inspector noted that PASNY and Consolidated Edison have agreed to perform joint offsite agency coordination activities.

PASNY had reached separate written agreements with each off-site agency.

It was therefore, determined that a joint approach to offsite agency coordination would pose no problems.

The inspector had no further questions.

d. Training

The inspector and PASNY management discussed plans for training individuals who may be assigned emergency duties in the event of an emergency. The inspector noted that a training program had not been developed. The inspector stated that a training program, similar to that currently administered by Consolidated Edison, would have to be developed prior to the transfer of the Indian Point 3 operating license to PASNY. This item is unresolved. (286/78-02-01)

e. Drills

Discussions with PASNY management personnel indicated that full consideration had not been given to meeting emergency plan drill requirements. Subsequent discussion with Consolidated Edison management indicated that further discussions between the involved parties would be necessary to formulate a concept for conducting drills that will ensure that each respective licensee's requirements will be met.

Discussions relating to the conduct of drills will necessitate minor revisions to the existing Consolidated Edison procedure by PASNY. The inspector informed PASNY management that development of the drill procedure would be required prior to licensee transfer. This item is unresolved. (286/78-02-02)

f. Facilities and Equipment

Discussion with PASNY and Consolidated Edison Management and review of PASNY MOU Number 28 indicated that all commonly shared emergency facilities and equipment will be inventoried and maintained by Consolidated Edison. The items included are: primary and alternate emergency control centers; emergency kits; and the first aid/decontamination facility.

The inspector had no further questions.



g. Management Control - Emergency Planning

The inspector noted that PASNY had an assigned Emergency Plan Coordinator with responsibility for the administrative control of emergency readiness. This individual coordinates directly with a Consolidated Edison counterpart in the dual licensee interface areas. PASNY has established an audit system for verifying the completion of certain actions by Consolidated Edison in their behalf; i.e., equipment inventory and maintenance. PASNY MOU Number 28 addresses the provision for PASNY audit of applicable Consolidated Edison performed services and provides a means of resolution of any noted discrepancies.

The inspector had no further questions.

5. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Unresolved items disclosed during this inspection are discussed in Paragraphs 4.d. and 4.e.

6. Exit Interview

On January 11, 1978, at the conclusion of the environmental portion of the inspection, Dr. Bores met with the individuals indicated in Paragraph 1 at the Con Ed offices. The scope and findings of this portion of the inspection were discussed.

On January 19, 1978, at the conclusion of the emergency planning portion of the inspection, Mr. Donaldson met with the individuals indicated in Paragraph 1 at Indian Point. The scope and findings of the inspection were discussed, including the following unresolved items:

Training (286/78-02-01)

Licensee management anticipated no difficulty in developing a training program, prior to licensee transfer, for individuals having emergency duties and who would not receive training under the existing Consolidated Edison emergency plan training program.

Drill Procedure (286/78-02-02)

Licensee management acknowledged the necessity to develop a procedure for conducting drills per the requirements of the emergency plan. It was also acknowledged that the procedure would be completed prior to license transfer.