



J. Phillip Bayne  
Executive Vice President  
Nuclear Generation

June 15, 1983  
IPN-83-60

Director of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Security Plan

Dear Sir:

By letters dated April 29, 1982 (IP3/NRC/049-82), May 14, 1982 (IP3/NRC/051-82) and August 9, 1982 (WPO/IP3/NRC/071/82), the Authority transmitted revisions to the security plan. The security plan transmitted via our letter of May 14, 1982 was a total revision and is to replace the entire existing security plan. The revisions transmitted via our letter of August 9, 1982 served to modify this new security plan. Implementation of these security plan revisions was intended to be completed within two years subsequent to NRC approval.

While the Indian Point 3 License has not been amended to reflect the security plan revisions, your letters of August 10, 1982 and October 27, 1982 stated that the revisions contained in the enclosures to our above referenced letters are consistent with the provisions of 10 CFR 50.54(p). With regards to 10 CFR 50.54(p), your letters may be interpreted as tacit approval for the implementation of the new security plan and its subsequent revision. However, a closer examination of your August 10, 1982 letter would seem to invalidate this interpretation. This letter acknowledges the receipt of our April 29, 1982 and May 14, 1982 letters and their consistency with the provisions of 10 CFR 50.54(p). The approval of the new security plan, which was submitted via our letter of May 14, 1982, would obviate the revisions submitted via our letter of April 29, 1982. Thus, your August 10, 1982 letter should not be construed as granting tacit approval of the new security plan. Previous discussions with the NRC Staff indicated that

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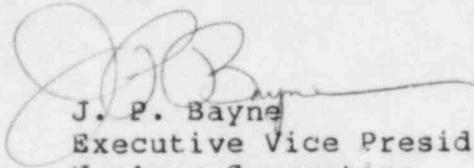
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the NRC would approve the security plan revisions via a license amendment, thereby supporting our contention that your August 10, 1982 letter did not grant approval of the new security plan. However, more recent discussions with the NRC Staff indicated that your letters of August 10, 1982 and October 27, 1982 did constitute NRC approval of the security plan revisions and hence the initiation of the two year implementation period.

The Authority requests that the NRC clarify this point of confusion by issuing their final position on this matter. The Authority will commence the two year implementation period upon the receipt of written NRC clarification. Moreover, the Authority anticipates that in the near future the NRC will issue a license amendment reflecting these security plan revisions. In the interim the Authority will adhere to the provisions of the revised security plan for all current operating practices effective May 1, 1983.

Should you or your staff have any questions, please contact Mr. P. Kokolakis of my staff.

Very truly yours,

  
J. P. Bayne  
Executive Vice President  
Nuclear Generation

cc: Resident Inspector's Office  
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