

ATTACHMENT I to JPN-85-14

PROPOSED
TECHNICAL SPECIFICATION
CHANGES
RELATED TO
SAFETY REVIEW COMMITTEE
ORGANIZATION CHANGES
(JPTS-84-19)

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
DPR-59

February 22 , 1985

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(B) Alternates

Alternative members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PORC activities at any one time.

(C) Meeting Frequency

Meetings will be called by the Chairman as the occasions for review or investigation arise. Meetings will be no less frequent than once a month.

(D) Quorum

The Chairman or Vice Chairman and four members, including designated alternates, shall constitute a quorum.

(E) Responsibilities

1. Review plant procedures, and changes thereto, required by Specification 6.8.
2. Review proposed tests and experiments that affect nuclear safety.
3. Review proposed changes to the Operating License and Technical Specifications.
4. Review proposed changes or modifications to plant systems or equipment that affect nuclear safety.
5. Investigate violations of the Technical Specifications and prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Resident Manager, who will forward the report to the Manager - Nuclear Operations and to the Chairman of the Safety Review Committee.
6. Review plant operations to detect potential safety hazards.
7. Review the Security Plan (including the Safeguards Contingency Plan) and implementing procedures annually.

8. Review the Emergency Plan and implementing procedures annually.
9. Perform special review and/or investigations at the request of the Resident Manager.
10. Review of those reportable occurrences requiring 24 hour notification to the NRC, in accordance with Specification 6.9.

(F) Authority

The PORC shall function to advise the Resident Manager on all matters related to nuclear safety and environmental operations. The PORC shall recommend approval or disapproval to the Resident Manager of those items considered in 6.5 1E (1) through (4) and determine if items considered in 6.5 1E (1) through (5) constitute unreviewed safety questions, as defined in 10 CFR 50.59.

In the event of a disagreement between the PORC and the Resident Manager, the Chairman of the SRC and the Executive Vice President - Nuclear Generation, or their designated alternates, shall be notified within 24 hours and written notification provided on the next business day; however, the Resident Manager shall have responsibility for resolution of such disagreement pursuant to Section 6.1.

(G) Records

Minutes of all meetings of the PORC shall be recorded and numbered. Copies will be retained in file. Copies will be forwarded to the Chairman of the SRC and the Executive Vice President-Nuclear Generation.

(H) Procedures

Conduct of the PORC and the mechanism for implementation of its responsibilities and authority are defined in the pertinent Administrative Procedures.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The SRC shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control

- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Environment
- k. Civil/Structural Engineering
- l. Nuclear Licensing
- m. Emergency Planning
- n. Other appropriate fields associated with the unique characteristics of a nuclear power plant

MEMBERSHIP

6.5.2.2 The SRC shall be composed of the following voting members:

Chairman:	Manager-Nuclear Safety Evaluation
Vice-Chairman:	Director-Quality Assurance
Member:	Vice President Nuclear Support-BWR
Member:	Vice President Nuclear Support-PWR
Member:	Vice President-Generic Nuclear Support
Member:	Vice President-Design and Analysis
Member:	Resident Manager-IP3
Member:	Resident Manager-JAF
Member:	Consultant

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the SRC Chairman; however, no more than two alternates shall participate as voting members in SRC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

MEETING FREQUENCY

6.5.2.5 The SRC shall meet at least once per calendar quarter during the initial year of facility operation following initial fuel loading and at least once per six months, thereafter.

Amendment No. 50, 60, 65, 78,

- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan (including Safeguard Contingency Plan) and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the SRC or the Executive Vice President-Nuclear Generation.
- h. The Facility Fire Protection Program and implementing procedures at least once per two years.
- i. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

AUTHORITY

6.5.2.9 The SRC shall report to and advise the Executive Vice President-Nuclear Generation on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8

RECORDS

6.5.2.10 Records will be maintained in accordance with ANSI 18.7-1972. The following shall be prepared, approved and distributed as indicated below:

- a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Executive Vice President-Nuclear Generation within 14 days after the date of the meeting.
- b. Reports of review encompassed by Section 6.5.2.7 above shall be prepared, approved and forwarded to the Executive Vice President-Nuclear Generation within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Executive Vice President-Nuclear Generation and to the management positions responsible for the areas audited within 30 days after completion of the audit.

ATTACHMENT II to JPN-85-14

SAFETY EVALUATION

RELATED TO

SAFETY REVIEW COMMITTEE

ORGANIZATION CHANGES

(JPTS-84-19)

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Section I - Description of the Proposed Changes

This safety evaluation considers the effects of the reorganization of the Authority's Safety Review Committee (SRC) as described below.

The Committee membership will be changed to include the next-to-highest level management in the Nuclear Generation, Engineering and Quality Assurance and Reliability Departments. The Directors of Mechanical, Electrical, Nuclear, Civil/Structural, and Piping and Process in the Design and Analysis Section of the Engineering Department will be replaced by the Vice President-Design and Analysis. The Managers of Radiological Health and Chemistry and Operational Analysis and Training in the Nuclear Generation Department will be replaced by the Vice President-Generic Nuclear Support. The Director of Environmental Programs in the Engineering Department will no longer be a member of the Committee.

The Resident Managers for the Indian Point 3 and James A. FitzPatrick facilities will be included as voting members of the Safety Review Committee. Previously, these individuals were non-voting members. Also, the Consultant to the Safety Review Committee will be included as a voting member of the Committee. Previously, this individual was an alternate voting member.

The Consultant may be either an individual under contract to NYPA or a regular, full-time employee of NYPA assigned by the SRC chairman. At a meeting, a regular, full-time employee may serve as a Consultant, even though a different individual is under contract as a Consultant to the SRC at that time.

These changes in the Committee membership reduce the Committee to nine (9) voting members.

In addition references to the Senior Vice President are changed to Executive Vice President, and typographical corrections are made on page 252a.

The change on page 249 is editorial in nature.

Section II - Purpose of the Proposed Changes

The Executive Vice President-Nuclear Generation has decided to increase senior management involvement and attention to the safe operation of the FitzPatrick plant. These proposed changes to the SRC membership serve to accomplish this objective.

Section III - Impact Of The Proposed Changes

The SRC's responsibility for independent review and audit of the FitzPatrick plant to assure safe operation of the FitzPatrick plant remains unchanged by the proposed membership changes.

The duties and responsibilities of the Chairman of the SRC are not affected by this reorganization of the Committee. The Chairman shall continue to report directly to the Executive Vice President-Nuclear Generation.

The SRC Program as described in the FitzPatrick FSAR and Technical Specifications is similar to that described in the NRC's Standard Technical Specifications (STS) (see Reference 3). The basic difference is the Authority's commitment that the Committee membership "shall collectively have the competence required to review problems in the following areas." [Emphasis added] The STS allow the Committee "to provide independent review and audit of designated activities in the areas." [Emphasis added] The changes proposed are consistent with the intent of the STS. Moreover, the Committee members replaced from the Engineering and Nuclear Generation Departments will be the alternates to the new voting members from the same Departments.

The inclusion of the Resident Managers as voting members is consistent with the FitzPatrick Plant's current Technical Specifications (and the STS) which state that "No more than a minority of the quorum shall have a direct line responsibility for the operation of the plant." The sentence in the FSAR that "The members of this committee do not have direct line responsibility for the operation of the plant" is merely a statement of fact of the present Committee membership, rather than a commitment.

The inclusion of the Consultant as a voting member is consistent with the current practice of the Chairman to consider that individual as one of the two alternates allowed "as voting members in SRC activities at any one time" under the current Technical Specifications (and the STS).

The Director of Environmental Programs will no longer be a member of the Committee; however, that individual shall provide expert advice to the SRC in matters relating to the environment as allowed under the current Technical Specifications (and the STS).

These proposed changes to the Technical Specifications can be classified as not likely to involve significant safety hazard considerations since they constitute purely administrative changes as cited in (i) of "Examples of Amendments that are considered not likely to Involve Significant Hazards Considerations..." Federal Register, Vol 48, No. 67, April 6, 1983.

Additionally, these proposed changes do not involve significant hazards considerations since they would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

Section IV - Implementation of the Proposed Changes

The charges, as proposed, do not adversely impact the ALARA, Security or Fire Protection programs at FitzPatrick, nor do they impact the environment.

Section V - Conclusion

The incorporation of these proposed changes:

- (1) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report;
- (2) will not increase the probability of an accident or malfunction of any type different from those evaluated previously in the Safety Analysis Report;
- (3) will not reduce the margin of safety as defined in the basis for any Technical Specification;
- (4) does not constitute an unreviewed safety question as defined in 10 CFR 50.59; and
- (5) involves no significant hazards considerations as defined in 10 CFR 50.92.

Section V - References

1. James A. FitzPatrick FSAR, Section 13.10.1.3 (Safety Review Committee)
2. James A. FitzPatrick Facility Operating License, Appendix A (Technical Specifications), Section 6.5.2 Safety Review Committee
3. NUREG-0123, Revision 3, Standard Technical Specifications for General Electric Boiling Water Reactors, Section 6.5.2 Company Nuclear Review and Audit Group (CNRAG)