

From: "Goetchius, Edward" <GOETCHIUUSE@coned.com>
To: "John Minns" <JLM3@nrc.gov>
Date: 5/10/01 9:56AM
Subject: FW: Unit I TS vs QAPD rev 16

The NRC request additional information in reference to our recent request for a Technical Specifications change for IP- 1 amendment - dated October 5, 2000, "Consisting of Administrative Changes to the QAPD." is as follows:

- 1- What section of the QAPD is TS section 3.2.1.a, 3.2.1.e, and 3.2.1.f..?
See below
- 2.Is the IP1 QAPD the same as IP-2? Yes
3. If different QAPD for Operating and SAFSTOR does IP-1 QAPD meets Appendix B of 10 CFR Part 50. N/A
4. Provide a copy of the relocated QAPD section. See below

> -----Original Message-----

> From: Cotter, Tim
> Sent: Wednesday, May 09, 2001 4:27 PM
> To: Goetchius, Edward
> Cc: O'Toole, William; Cotter, Tim
> Subject: Unit I TS vs QAPD rev 16

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> Attached are the Unit I Tech Specs vs the QAPD rev 16 text that will be
> include in the July 2001 update submittal. The text in bold italics with
> a revision bar is new text being added to reflect the TS change. Under
> 50.54(a) these QAPD changes are administrative changes that do not require
> prior NRC approval.

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> The QAPD rev 15 text is included to show how the existing text addresses
> the Unit I technical specifications.

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> <<QAPD15vsUnit 1 TS.doc>>

CC: "Louie, Richard" <LOUIER@coned.com>

Comparison of Unit I Technical Specification changes vs. QAPD rev 16

Unit I TS 3.2.1.a vs QAPD 3.2

Unit 1 TS

3.2.1 Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

a.

Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the **Quality Assurance Program Description (QAPD)**. Updated FSAR for Indian Point Unit No. 2.

QAPD rev 16

3.2 Assignment of Authority & Responsibility

The Senior Vice President of Nuclear Operation is the Chief Nuclear Officer of Con Edison and reports directly to the President of Con Edison Company of New York. The Senior Vice President of Nuclear Operation of Con Edison has directed that all personnel involved in activities associated with the safety of the nuclear power plants participate in the quality assurance program.

Lines of authority, responsibility, and communication among the organizations participating in this program are shown in Charts A, B C and D. Chart A depicts the Corporate organization, Chart B depicts the Chief Nuclear Officer's organization and Chart C the Nuclear Power organization and Chart D the Nuclear Engineering organization. These relationships, departmental responsibilities and key personnel job descriptions are documented and updated as appropriate. Functions or responsibilities assigned to specific position titles may also be delegated in accordance with Corporate Policies.

The Indian Point Unit 1 Project Manager has authority over the conduct of Unit 1 activities. The Unit 1 Project Manager is responsible to the Indian Point Station Plant Manager for the assuring that these activities are performed in accordance with the quality assurance program.

Unit I TS 3.2.1.e vs QAPD Appendix B 1.1 & 1.6

- e. 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.

QAPD Appendix B section 1.1 Function

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

QAPD Appendix B section 1.6 Responsibilities

- a. Review of (1) all procedures required by Technical Specification 6.8 and changes to procedures that change the document's intent, and (2) any other proposed procedures or changes thereto as determined by the Chairman of SNSC to affect nuclear safety,
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety,
- f. Review of facility operations to detect potential nuclear safety hazards,
- k. Review of Unit 1 Operating Organization

Unit I TS 3.2.1.f vs QAPD Appendix B 2.1

- f. 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 activities, and radiological environmental effects.

QAPD Appendix B section 2.1 Function

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