

William J. Cahill, Jr.
Vice President

Regulatory

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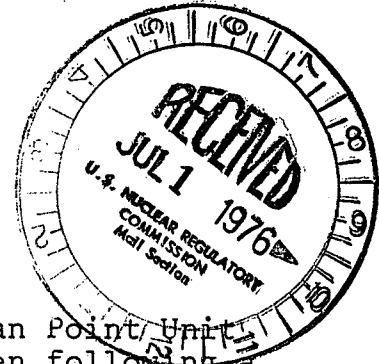
Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N.Y. 10003
Telephone (212) 480-3819



June 22, 1976

RE: Indian Point Unit Nos. 2 & 3
Docket Nos. 50-247
50-286

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert W. Reid, Chief
Operating Reactors Branch No. 4
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Gentlemen:

A question of interpretation of the Indian Point Unit Nos. 2 & 3 Technical Specifications has arisen following a recent performance of Consolidated Edison's internal audit program.

Section 6.10.2 of these specifications provide lists of plant records which must be retained for the duration of the Facility Operating Licenses. One item so identified in Section 6.10.2 (i) of both Unit's specifications is the "Records of Quality Assurance activities required by the QA Manual". We interpret this specification, 6.10.2 (i), to apply only to the retention of records of quality assurance activities designated as "lifetime" in the QA Manual. Other quality assurance records specified in the QA manual should have retention times less than the plant lifetime.

Our interpretation of this specification is consistent with the philosophy espoused by ANSI N45.2.9, "Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants". Unless otherwise notified, our policy will be based on the understanding that specification 6.10.2(i) is not intended to require that all records related to quality assurance activities required by the QA manual need be retained for the plant lifetime.

Very truly yours,

A handwritten signature in cursive script that reads "William J. Cahill, Jr.".

William J. Cahill, Jr.
Vice President

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