

7/10/73

BEFORE THE UNITED STATES
ATOMIC ENERGY COMMISSION

In the Matter of)
)
Consolidated Edison Company) Docket No. 50-247
of New York, Inc.)
(Indian Point Station, Unit No. 2))

APPLICANT'S MEMORANDUM IN SUPPORT
OF ITS SPECIAL PRESENTATION
ON QUALITY ASSURANCE MATTERS

During oral argument held on July 2, 1973 in the above-captioned proceeding the Board requested "in light of the several Appeal Board decisions"^{1/} that the parties submit a special presentation concerning quality assurance matters. The Board requested that this presentation be directed particularly to the question whether the present quality assurance program for Indian Point 2 is likely to prevent "with all reasonable assurance, the occurrence of many of the items which have been reported as abnormal occurrences, based upon, of course, the record."^{2/}

^{1/} Tr. 144.

^{2/} Tr. 142-143.

It is Applicant's position that the recent Appeal Board decisions^{3/} require neither supplementation nor clarification of this record regarding the subject of quality assurance. Additionally, the experience of "abnormal occurrences" during Applicant's testing program does not indicate that the quality assurance program for the operation of Indian Point 2 is inadequate. To the contrary, the evidence in this proceeding demonstrates that the quality assurance program for the operation of Indian Point 2 is adequate. Indeed, Applicant's quality assurance program provides reasonable assurance that abnormal occurrences will be prevented during the full-term, full-power operation of Indian Point 2 and, further, that if such events should occur they will be detected, analyzed and corrected swiftly.^{4/}

The recent Appeal Board decisions are easily distinguishable from the instant proceeding. In the Midland construction permit proceeding several Commission inspection reports citing a number of deficiencies

^{3/} Consumers Power Co. (Midland Plants, Units 1 and 2), ALAB-106, RAI-73-3 at 182 (March 26, 1973); Vermont Yankee Nuclear Power Corp. (Vermont Yankee Nuclear Power Station), ALAB-124, RAI-73-5 at 358 (May 23, 1973); Duke Power Co. (William B. McGuire Nuclear Station, Units 1 & 2); ALAB-128 (June 13, 1973).

^{4/} Applicant's Special Presentation on Quality Assurance Matters submitted herewith.

in the Applicant's implementation of a quality assurance program had been received in evidence. In Vermont Yankee, the Staff indicated in its proposed findings that particular details of the Applicant's quality assurance program were unsatisfactory. In McGuire, the Applicant itself stated that its quality assurance program did not comply with applicable requirements. The Appeal Board in each of those cases addressed the subject of quality assurance for the reason that the evidentiary record in each proceeding indicated deficiencies.^{5/} In contrast, the record in this proceeding neither indicates nor demonstrates such deficiencies. Rather, this record underscores the adequacy of Consolidated Edison's quality assurance program. Although the intervenor has attempted at various times during the course of this proceeding to suggest particular areas of inadequacy, Consolidated Edison has each time shown with extensive and detailed evidence the comprehensiveness of its quality assurance program for Indian Point 2.^{6/}

^{5/} The Appeal Board in Vermont Yankee stated that the record was unclear as to whether a letter from the staff to the Applicant setting forth the Staff's view that the formulation of the Applicant's quality assurance program was unsatisfactory had been received in evidence.

^{6/} See Applicant's Presentation, Paragraph 3.

Consolidated Edison is now operating Indian Point 2 for testing purposes in accordance with the detailed testing program set forth in the record.^{7/} Applicant has testified that a primary purpose of this program is to verify that the equipment and systems at Indian Point 2 are capable of performing their intended functions.^{8/} This is but one part of the multi-tiered quality assurance program. During various stages of this testing program, situations which were embraced by the definition of "abnormal occurrence" were reported in accordance with the technical specifications for the testing license. But such occurrences do not indicate inadequacy. Rather,

"[t]he goal of an effective quality assurance program is to minimize the occurrence of problems, recognizing that no program can completely eliminate problems. Two functions of an

^{7/} See Applicant's Presentation, Paragraph 4.

^{8/} See Applicant's Presentation, Paragraph 4.

effective quality assurance program are the early detection of problems when they occur, and appropriate analysis and correction of the problem."^{9/}

Respectfully submitted,

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Dated: July 10, 1973

^{9/} Letter from Mr. O'Reilly to Mr. Roisman, June 26, 1973. This letter is not in evidence in this proceeding but is part of the public docket maintained in the Commission's Public Document Room. It may be worth noting that Mr. O'Reilly added that the quality assurance program for Indian Point 2 was considered to be "acceptably effective."