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September 7, 1973

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Gentlemen:

Re: Cor Ed Indian Point No. 2
Docket No. 50-247

We acknowledge receipt of the Chairman's letter dated August 9, 1973 in which the Board expressed concern regarding the character and sufficiency of the evidence regarding Consolidated Edison's quality assurance program for operations.

The Council staff has reviewed the record with respect to Consolidated Edison's quality assurance program and submits for the Board's consideration the attached document entitled "Comments of the New York State Atomic Energy Council on Consolidated Edison's Quality Assurance Program for the Indian Point Site".

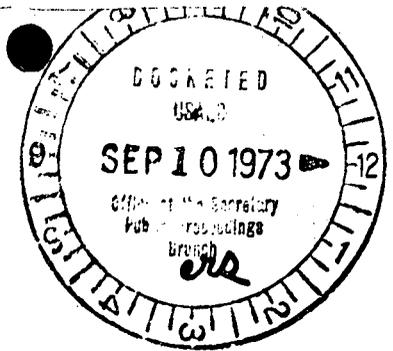
Sincerely,

J. Bruce MacDonald

cc: Myron Karman, Esq.
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COMMITTEE OF THE NEW YORK STATE ATOMIC
ENERGY COUNCIL STAFF ON CONSOLIDATED
EDISON'S QUALITY ASSURANCE PROGRAM
FOR THE INDIAN POINT SITE



The Consolidated Edison quality control and assurance program for the Indian Point site as described by the enclosure to a letter to Mr. Karl Knief from William J. Cahill, dated July 6, 1973, has been carefully reviewed.

The program as described contains the essential elements necessary to meet 10 CFR 50, Appendix B, and Safety Guide 33 requirements. However, some program deficiencies appear to exist and the following problem areas and recommendations are presented for the Board's consideration.

PROBLEM AREA 1

The Consolidated Edison program does not provide for the clear separation of quality control and quality assurance functions. The two are combined into one organizational structure with the same on-site personnel performing both quality control and quality assurance duties.

RECOMMENDATION

The quality assurance and reliability organization should be clearly divided so as to have separate personnel performing the two major functions.

- (a) The quality control part of the organization should be responsible for promulgating the standards, criteria and all procedures for quality assurance implementation.

This part of the organization house the "theory personnel" who will superimpose on all phases of plant operation quality assurance procedures based on accepted nuclear quality control criteria.

- (b) The quality assurance part of the proposed organization would be responsible for implementing on a continuing basis the programs designed by the control group. The quality assurance group would house the personnel who perform the inspections, verifications and checks required by the quality control program.

PROBLEM AREA 2

The Station Quality Assurance Engineer (SQAE) reports to and is under the direction of the manager, Nuclear Power Generation Department (Indian Point Site Manager).

RECOMMENDATION

This is considered to be a problem of major importance. With an organizational structure of this type, it is possible to have a situation where the SQAE would not be free to implement programs based on acceptable quality control criteria that are entirely divorced from power generation requirements. The SQAE should report to, be evaluated by, and receive his salary increases from someone who is not concerned, or at least, from someone who is not immediately concerned with power generation.

PROBLEM AREA 3

Separate from, but related to, the organizational problem above, Consolidated Edison quality assurance program is not as clear as it should be concerning the preparation and implementation of operating procedures, test procedures and maintenance procedures. The quality control and assurance responsibilities in designing and implementing these procedures is not adequately defined.

RECOMMENDATION

The program should clearly set forth that the design and preparation of operating, test and maintenance inspection procedures should be the responsibility of the appropriate engineering design organization.

Further, that once these detailed written procedures are prepared they should be reviewed and approved by the quality control organization, whose responsibility will be to insure proper implementation by superimposing on the procedures adequate quality assurance verification and inspection requirements.

Maintenance repair procedures should be the joint responsibility of the appropriate engineering design organization and the quality control group. This subtle modification more readily insures that the quality assurance inspections and verifications procedures for repair work can adequately guarantee each small detail step of the repair is properly accomplished.

PROBLEM AREA 4

The same personnel are responsible for defining inspection requirements, preparing the detailed work inspection instructions, as well as performing the inspection and verification procedures (Section X of the proposed program).

RECOMMENDATION

In line with the recommendation in Problem Area 1 defining inspection, requirements and procedures should be a quality control function separate from quality assurance.

PROBLEM AREA 5

The Nuclear Power Generation Department in an emergency may authorize urgent repairs and circumvent quality assurance requirements (Section X of the proposed program).

RECOMMENDATION

This authority should be clarified to insure that "urgent" relates only to those emergencies which create a risk to public health and safety and does not relate to those situations where the utility alleges an emergency need for power.

PROBLEM AREA 6

Storeroom personnel monitor the general condition of stored items and report problems to the SQAE.

RECOMMENDATION

This procedure should be expanded to require that the quality assurance personnel periodically inspect stored items and that the SQAE not depend on storeroom personnel to report problems.

SUMMARY

Overall review of the quality control and assurance program indicates that the AEC inspection staff considers that the program meets the requirements of 10 CFR 50, Appendix B (RO Inspection Report No. 50-603/73-02 and 50-247/73-03). However, we are convinced that modifications as recommended above would significantly improve the program's effectiveness.

DATED: September 7, 1973