

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N Y 10003
Telephone (212) 460-3819

May 22, 1974

Re: Indian Point Unit No. 3
Docket No. 50-286

Mr. Eldon J. Brunner, Chief
Reactor Operations Branch
Directorate of Regulatory Operations
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner:

In reply to your letter of April 30, 1974 concerning the inspection conducted by Mr. Johnson on April 16-19, 1974 at our Indian Point Unit No. 3 facility, we offer the following response.

Criteria II of 10CFR50 Appendix B requires the establishment of a quality assurance program documented by written procedures to provide control over activities affecting the quality of those structures, systems, and components covered by the program. Criteria VI, while not identifying any specific group, provides that those measures established to control the issuance of documents assure that they are reviewed for adequacy and approved for release by authorized personnel. Our Station Administrative Order (SAO) 102 provides a control, establishes requirements for review, and assigns review and approval responsibility. Therefore, we judge SAO 102 to fully satisfy the related requirements of Criteria II and VI.

However, to further strengthen our program and in consonance with guidance provided by your inspector, we have revised SAO 102 and the Station Nuclear Safety Committee (SNSC) charter to require SNSC review prior to final approval and implementation of any procedure involving safety related components. These revisions are applicable to each of the Indian Point Facilities with two exceptions. First, in the case of Unit #1, our Nuclear Facility Safety Committee, rather than SNSC, will continue to review procedures as presently

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required by the Technical Specification for that Unit. Second, allowance has been made for the use in emergency situations of new or revised procedures prior to SNSC evaluation. All Unit No. 3 safety related procedures, including those already issued, will be evaluated by the SNSC prior to the fuel loading of the reactor.

We would be pleased to further discuss this matter with you if you should find this desirable.

Very truly yours,

William J. Cahill, Jr.