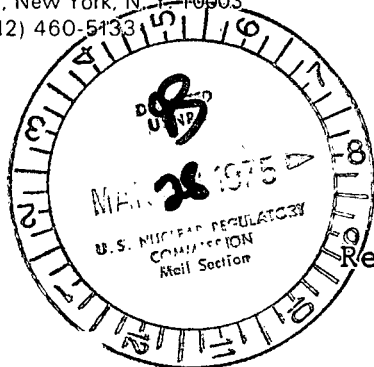


Carl L. Newman
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N. Y. 10003
Telephone (212) 460-5133

File Copy

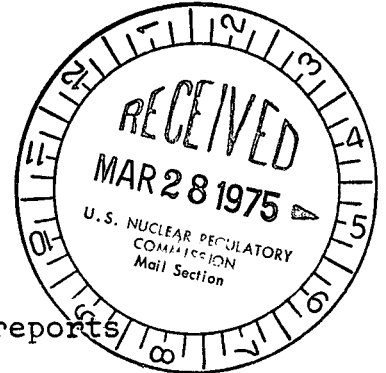
Regulatory



March 27, 1975

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

Mr. A. Giambusso, Director
Division of Reactor Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Dear Mr. Giambusso

Enclosed are forty (40) copies of the following reports
for Indian Point Unit No. 3:

1. "A Technical Report on Steam Generator Tubesheet Cladding," WNET-114.
2. "Report on Consolidated Edison's Indian Point Unit No. 3, Containment Vessel Structural Integrity Test", dated February 21, 1975.
3. "Preoperational Integrated Leak Rate Test of the Reactor Containment Building; Consolidated Edison Corporation, Indian Point Unit 3", dated March 19, 1975.

Very truly yours

Carl L. Newman
Vice President

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PDR ADOCK 05000286
A PDR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
CONSOLIDATED EDISON COMPANY)
OF NEW YORK, INC.) Docket No. 50-286
(Indian Point Station,)
Unit No. 3))

CERTIFICATE OF SERVICE

I hereby certify that I have this 28th day of
March, 1975, served the foregoing letter from Carl L. Newman
to Angelo Giambusso dated March 27, 1975, and the documents
listed therein by mailing copies thereof first class, postage
prepaid, and properly addressed to the following persons:

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Commission
Washington, D.C. 20555

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University of California
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Washington, D.C. 20555

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Mayor, Village of Buchanan
Buchanan, New York 10511

Atomic Safety and Licensing
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U.S. Nuclear Regulatory Commission
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Washington, D. C. 20555
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MAR 24 1975

Docket Nos. 50-3
50-247
and 50-286 ✓

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TR Branch Chiefs
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JPanzarella
RVoilmer
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Mr. William J. Cahill, Jr.
Vice President
Consolidated Edison Company of New York
4 Irving Place
New York, New York 10003

Dear Mr. Cahill:

I am sorry that there appears to be some misunderstanding of our letters concerning Quality Assurance programs for Indian Point, Units 1, 2 and 3, sent to you on December 6, and December 10, 1974. Your letter of January 13, reflects a belief that our earlier letters sought to impose some additional or inconsistent requirements concerning your Quality Assurance programs. Our letters should have made clearer our belief that the guidance reflected in WASH-1283, 1284, and 1309, would not entail significant modification of your Quality Assurance programs which have been previously reviewed in connection with your request for an operating license for Unit 3, and which were found to be in compliance with 10 CFR Part 50, Appendix B.

Before responding to your specific concerns, I would like to summarize the background leading to our letters of December 6, and December 10, 1974.

Over the past year, the Commission has sought to provide some consistent and uniform guidance relating to quality assurance activities for nuclear power plants. Since the promulgation of 10 CFR Part 50, Appendix B, experience in the actual performance of quality assurance activities at nuclear facilities in the design and procurement, construction, and operating phases has provided valuable information. This information has helped to identify those aspects of well-designed quality assurance programs which have proved of value in assuming that quality assurance programs, as implemented, in fact conform to goals toward which 10 CFR Part 50, Appendix B is directed. The documents referred to in our letters of December 6, and December 10, 1974, WASH-1283, 1284, and 1309 reflect this experience and provide guidance as to certain specific implementation of the criteria of Appendix B.

mpc

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DATE						

Mr. William J. Cahill, Jr.

MAR 24 1975

The intent of our letters was not to suggest that your current quality assurance program for Indian Point Units 1 and 2, and as amended for Indian Point Unit 3 does not meet the requirements of Appendix B to 10 CFR Part 50. Our letters were intended to convey a recognition that a matter as important as quality assurance is not a static issue. Therefore, quality assurance programs should be modified, as appropriate, where meaningful new guidance is available to improve the techniques for implementing the goals delineated in Appendix B to 10 CFR Part 50.

We believe that a degree of uniformity with respect to the quality assurance programs for the many nuclear power plants which are now in operation and which will be in operation in the near future is appropriate and desirable. The WASH documents are intended to provide this degree of uniformity. We anticipate that these WASH documents will not only assist in implementing the quality assurance objectives of Appendix B but also in assessing conformance with these objectives. In this regard, you state in your letter of January 13, 1975 that a commitment to follow the guidance of the WASH documents would "lead to confusion" in conducting inspections of your quality assurance program by the NRC's Office of Inspection and Enforcement. It is our belief that a quality assurance program organized to conform to the guidance of the WASH documents and incorporated by all licensees should provide greater objectivity and consistency in assessing conformance to Appendix B.

In light of the foregoing, we restate our request for a commitment to follow the guidance provided in the WASH documents. If a general commitment is not possible or desirable, we request that your response (1) describe the extent to which your QA Program will conform with and (2) identify the organizational elements responsible for implementing the various provisions of WASH-1283, 1284 and 1309. If you elect not to follow all of the various provisions, we request that you describe in detail, equivalent to that furnished in the guidance, the alternate methods that will be used, the manner of implementing them, and the organizations responsible for their implementation.

In connection with your response of January 10, 1975, to our letter of December 6, 1974, we are glad to have on the record our prior understanding that your enhanced Quality Assurance program submitted in connection with the Unit 3 application was, in fact, the program utilized for Units 1 and 2, and that the improvements in that program

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MAR 24 1975

Mr. William J. Cahill, Jr.

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made in connection with the operating license review for Unit 3 are automatically reflected in the programs for Units 1 and 2, since your program is a station-wide program.

I hope this clarifies the matter and alleviates the concerns expressed in your letter of January 13, 1975. We look forward to receiving your analysis of your program as described in this letter.

Sincerely,

Original Signed by
Alexander Dromerick

for D. B. Vassallo, Chief
Light Water Reactors Project Branch 1-1
Division of Reactor Licensing

cc: See page 4

OFFICE	LWR 1-1	OR:L	QAB	OELD	LWR 1-1	
SURNAME	<i>MW</i> MAYcock:mk	<i>66</i> Lear/ PERickson	<i>DA</i> Dromerick	<i>MWP</i>	<i>DBV</i> DBVassallo	<i>M</i>
DATE	3/19/75	3/19/75	3/19/75	3/29/75	3/29/75	

Mr. William J. Cahill, Jr.

- 4 -

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