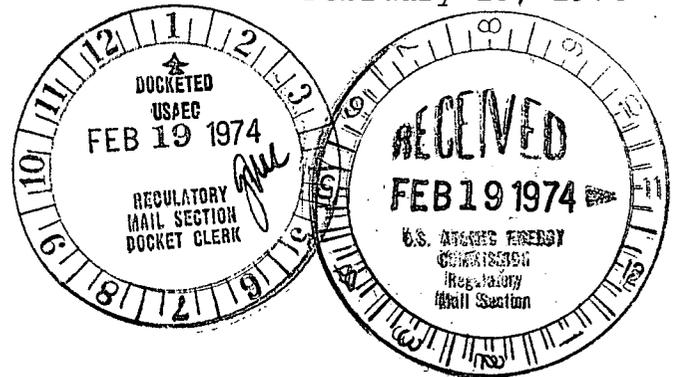


Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N. Y. 10003
Telephone (212) 460-5133

February 15, 1974

Mr. Richard C. DeYoung
Assistant Director
Light Water Reactors, Group I
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545



Dear Mr. DeYoung

Your letter of January 22, 1974 requested information concerning the authority and organizational freedom of Consolidated Edison's quality assurance personnel and also those quality assurance personnel of the other principal organizations concerned with the construction of Indian Point Unit No. 3. Those organizations include the prime contractor and NSSS supplier (Westinghouse Electric Corporation), the constructor (WEDCO Corporation) and the architect-engineer, (United Engineers & Constructors). Appendix B to the Indian Point Unit No. 3 FSAR contains our quality assurance program. Our program provides the requisite authority and organizational freedom, as required by 10CFR50, Appendix B, for quality assurance personnel. This response references specific portions of Appendix B to the FSAR where you may find the information you have requested.

Response to Question No. 1

Section III (The General Project Plan) of Appendix B to the FSAR describes how Con Edison assures quality within the framework of the project organization. The inter-relationship of participating quality assurance groups is shown in Figure B-1. The organization and respective functions of these principal participants are addressed in Section IV.

a. Consolidated Edison

Con Edison's organization is charted in Appendix VI (Figure 1).

Over the past several months, certain reporting relationships have been revised. You may wish to consider these in your determination. The Vice President of Quality Assurance and Reliability now reports directly to the President of the Company. The Vice Presidents of Engineering and of Construction now report to the Senior Vice President of Central Operations, who in turn reports to the President. Within QA&R, the Construction Quality Assurance Section has been redesignated as the QA-Operations Section. Responsibilities

of this section with respect to Indian Point Unit No. 3 construction have not changed except the U. S. Testing Company is now administrated by the Resident Construction Manager.

The responsibility of Consolidated Edison, as owner and operator of the facility is broadly stated in Section I, with detail concerning authority and duty included in Section IV (Subsection A) and pertinent changes are included in Appendix B-VI. Stop work authority is specifically addressed (Appendix B-VI, Page X-76 and X-77). Surveillance activities delegated by Con Edison to the U. S. Testing Company are discussed in Section IV (Subsection B).

The broad technical concept of control is provided by the functionally independent Quality Assurance and Reliability group. The organizational independence of QA&R is noted in Appendix B-VI. Implementation is the responsibility of the Con Edison Indian Point Unit No. 3 Resident Construction Manager. This relationship is charted in Appendix B-VI (Figure 1). Administrative control for Con Edison organizations follow the solid lines on Figure 1. This figure also shows communication and reporting paths for both QA&R site representative and for the Resident Construction Manager's organization, up to corporate management.

b. Westinghouse Electric Corporation

The Westinghouse Nuclear Energy Systems Division organization is charted in Appendix B-1 (Figure 1). Each of the several Quality Assurance groups is functionally independent; this may be observed in Figure 1. The several Westinghouse quality assurance roles are discussed in Section IV (Subsection C). This section describes the various phases of Westinghouse efforts and notes those tasks that are retained and those delegated (largely to WEDCO). The control of site quality assurance activity is delegated to WEDCO. Appendix B-I is the Westinghouse Quality Assurance Program. Technical and administrative direction follow organization chart paths.

c. WEDCO Corporation

The WEDCO organization is charted in Appendix B-II (Figures 1 and 2). The Reliability Manager is functionally independent of construction and operations. This may be observed in

Figure 2. These figures show, in a single box, the WEDCO President-Executive Vice President. We note that the Executive Vice President slot is not filled. The Reliability Manager and the Vice President of Construction and Operations both report to the President. WEDCO's quality assurance responsibility, authority and primary duties are broadly discussed in Section IV (Subsection D) and in detail in Appendix B-II. Regarding stop work, procedures are in effect that would cause any lack of concurrence of the WEDCO Vice President of Construction and Operations and the Reliability Manager on matters relating to project quality to immediately be brought to the attention of the President of WEDCO. Overall technical direction of the WEDCO Reliability and Quality Assurance Program is provided by the WEDCO Reliability Manager (Appendix B-II - Section 2.5). Administrative direction follows the solid lines on the charts included in Appendix B-II (Figures 1 and 2). Figure 1 shows reporting and communications paths between the Reliability Manager, who is site based, and corporate management.

d. United Engineers & Constructors

The United Engineers & Constructors quality assurance structure is shown in Appendix B-III (Figure 1). This organizational structure provides for independence. United Engineers & Constructors has first level responsibility for quality assurance covering design and specification of equipment, materials and structures within their scope of supply. The UE&C role is discussed in Section IV (Subsection E) and in detail in Appendix B-III.

Response to Question No. 2

The organizations and personnel responsible for the quality assurance of construction possess the necessary authority and enjoy the required organizational freedom and independence to identify quality problems, to initiate, recommend or provide solutions, and to verify implementation. Authority has been addressed in our response to Question 1. Freedom and independence are provided by the organizational structure and can be recognized in the various organizational charts. Freedom and independence are also addressed in Section IV.

February 15, 1974

a. Consolidated Edison

The independence of Con Edison's quality assurance functions can be recognized in Appendix B-VI (Figure 1). This Appendix also addresses the identification and remedy of quality problems by QA&R and by the Resident Construction Manager's organization in the performance of their monitoring activity. U. S. Testing, a fully independent agent, also identifies quality problems and assures corrective action (Section IV - Subsection B).

b. Westinghouse Electric Corporation

The functional independence of Westinghouse quality groups is noted in Subsection C and in Appendix B-I (Paragraph 2.1). Non-conformance and corrective action are also dealt with in Appendix B-I (Paragraph 7.0).

c. WEDCO Corporation

The WEDCO Reliability organization reports independent of Construction and Operations. This is best illustrated by Figure 2, Appendix B-II. Detail quality assurance procedures provide for the identification of quality problems and for corrective action.

d. United Engineers & Constructors

United Engineers & Constructor's role in design control, relate more directly to quality problem prevention, rather than identification and corrective action. UE&C participates in construction non-conformance control actions by reviewing and approving/disapproving dispositions.

We trust this information meets your needs.

Very truly yours



Carl L. Newman
Vice President

enc.
md

September 30, 1975

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

no flaws will exist in the inspection region which could propagate and cause a loss of coolant accident. Table 1 describes the augmented schedule of inspections and compares it with the presently proposed Technical Specifications requirements.

The most significant feature of this program is the non-destructive examination of the cold leg nozzles from the outside pipe surface. Such a technique allows increased frequency of inspection of cold leg nozzles without removing the core barrel and makes the safe-end to pipe welds accessible.

The proposed inspection program has been evaluated on the basis of system transients and fracture mechanics data for the location of concern. This evaluation indicates that no allowable flaw would grow to critical size during the interval between scheduled inspections. Moreover, the baseline examinations for Unit No. 3 nozzle to safe-end welds showed no indications. Therefore, the proposed inservice inspection program will provide a very high degree of confidence that a pipe break will not occur at the reactor vessel nozzle.

We would be pleased to arrange a meeting to present whatever additional information you require to evaluate this proposed alternative resolution.

Very truly yours,



William J. Cahill, Jr.
Vice President

mp

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TABLE 1

INDIAN POINT UNIT NO. 3 - PROPOSED AUGMENTED INSERVICE
INSPECTION PROGRAM

	Time of Inspection	Pipe	Weld Location	Type of Inspection
Present Technical Specification Requirements	First and second 3-1/3 year intervals	Two reactor outlets each interval	A	UT and V from inside of pipe
	Third 3-1/3 year interval	Four reactor inlets	A	UT and V from inside of pipe
Proposed Additional Inspections	First and second 3-1/3 year intervals	Two reactor inlets each interval	A, B	UT and PT from outside of pipe
	Third 3-1/3 year interval	Four reactor outlets	A, B	UT and V from inside of pipe

Weld Locations

- A. Nozzle to Safe-End
- B. Safe-End to Pipe

Types of Inspection

- UT - Ultrasonic Examination
- PT - Liquid Penetrant Examination
- V - Visual Examination