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R. T. Carlson, Senior Reactor Inspector, CO, Region I, Newark, N. J.
Thru: D. R. Muller, Chief EPB-1, Division of Reactor Licensing

THE INVESTIGATION OF THE QUALITY ASSURANCE PROGRAM OF INDIAN POINT 3

The subject investigation encompassed four days. The first day being in the offices of Consolidated Edison in New York City, the second in the offices of U.S. Testing Company, Hoboken, New Jersey, and the third and fourth days in the offices of United Engineers and Constructors (UE&C), Philadelphia, Pennsylvania. The purpose of this Quality Assurance Investigation was to obtain objective evidence of the implementation of the Indian Point 3 Quality Assurance Program. My area of responsibility in this investigation was Sections, III, V, VI, XVI, XVII, and XVIII, of Appendix B to 10 CFR 50. Enclosed is my report of the subject investigation and the following is my subjective opinion of the overall Indian Point 3 Quality Assurance Program.

In general, Consolidated Edison's activity in the QA program exceeds that which was outlined and in their QA supplement to the Indian Point 3 application dated February 20, 1969. The areas where I find their program lacking is that of document control and the retention of QA documents. At present, no formal procedures exist for either of these areas. The auditing function of U.S. Testing, although adequate and quite necessary, lacks what I feel is necessary formal organization. U.S. Testing does not have any prescheduled system of audits. In short, it is unlikely that they know this week what audits will be performed by them next week. My only criticism of the UE&C QA program is their lack of internal audits especially in their engineering departments. They have documented procedures covering most of the important elements as outlined in the Quality Assurance criteria. This includes site audits of their activities, but it lacks any audits of their offices.

The Quality Assurance Program of WEDCO was touched on only briefly. We were assured that all other Quality Assurance activities were the same, and that the WEDCO Quality Assurance program was in addition to any existing programs. WEDCO has assigned a Quality Assurance Manager for site activities. At present he is accumulating a staff, but no procedures regarding Quality Assurance exists with respect to any WEDCO activities. Plans are that WEDCO will eventually relieve UE&C of all their Quality Assurance responsibilities at the site. My concern is that this change-over, unless

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R. T. Carlson

- 2 -

observed very closely by all concerned parties, could result in a discontinuity of Quality Assurance surveillance at the site. Before this change-over is affected, WEDCO should be required to submit their Quality Assurance procedures to the Commission for review and at that point another investigation be made on a smaller scale of the WEDCO activities.

I feel the investigation went very smoothly and that all objectives of the investigation were accomplished. One problem that was encountered in each organization investigated, was the lack of personnel knowledgeable in the Quality Assurance program of that organization. At the end of each introductory meeting, two or more of the investigators inevitably would want to talk with the same individual. This resulted, in each case, of the inspectors doubling up on one individual. Therefore, one investigator's time was lost while the other investigator was covering his area of responsibility.

The objective findings of this investigation are enclosed in the attached report. Comments and criticisms are also included in each section of the report.

C. J. Hale
Project Leader
Division of Reactor Licensing

cc: J. B. Henderson, wo/encl.

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