

INDIAN POINT NUCLEAR GENERATING, UNIT NO. 3

SAFETY EVALUATION REPORT

QUALITY ASSURANCE

General

The description of the Quality Assurance (QA) Program for Indian Point Nuclear Generating Unit No. 3 (Indian Point 3) is contained in Appendix B to the FSAR, supplemented by information contained in Supplements 10 and 15 to the application and a letter of commitment from W. Cahill to R. C. DeYoung dated April 12, 1973, filed in response to our requests for additional information. Our evaluation of the description of the QA Program is based on a review of this information and related discussions with the applicant to determine the ability of Consolidated Edison Company of New York, Inc. (CE) to comply with the requirements of Appendix B to 10 CFR 50 for the operational phase of Indian Point 3.

Organization and Program

Responsibility and authority to define and direct the QA Program is assigned by CE to its Vice-President for Quality Assurance and Reliability (QA&R) who reports directly to CE's Executive Vice-President, Central Operations. Reporting to the Vice-President of QA&R are a Director of Quality Assurance and a Director of Quality Standards and Reliability. On the staff of the Director of Quality Assurance are a QA Manager for Engineering, a QA Manager for Operations, and QA Project Engineers, including one for Indian Point 3 project.

QA&R's responsibilities include review of specifications, design drawings, and modification, maintenance and repair procedures for adequacy of QA provisions and verification of conformance to the quality assurance procedures. The Director of Quality Standards and Reliability is staffed with consultants having backgrounds in metallurgy, welding, non-destructive examination, reliability, quality systems, electrical engineering, and mechanical engineering.

The responsibility for operating and maintaining Indian Point 3 is assigned to the Vice-President of Power Supply who is on the same organizational level as the Vice-President for QA&R. An on-site Station QA Engineer reports to the Power Supply organization and is responsible for the effective implementation of onsite QA and QC functions. When technical support is required or necessary, he has direct access to the centralized QA organization under the Vice-President of QA&R. The Station QA Engineer is independent from the Station Manager for Operation and Maintenance in that both persons are on the same organizational level. The Station QA Engineer and staff perform quality control inspections, in-service inspection, receipt inspection, and control the Station Central Files.

Indian Point 3 does not have on-site review committee but has, in addition to the Station QA Engineer and headquarters QA&R staff, a Nuclear Facilities Safety Committee (NFSC) responsible for advising the Executive Vice-President of Central Operations regarding the safety aspects of CE's nuclear power facilities.

Based on our review of CE's organizational arrangements for the QA Program for Operations we conclude that adequate control, independence, authority, and management involvement are provided and that the QA organization is acceptable for the operational phase.

As part of our review, we requested CE to indicate their compliance with the provisions of AEC Safety Guide 33 on QA for Operations. CE did not agree to comply with Safety Guide 33, pending the outcome of their further study of the requirements and recommendations contained within ANS 3.2, draft 8 which is a part of Safety Guide 33. We then requested CE to commit, by April 15, 1973, to the implementation of both the

requirements and recommendations of Section 4.0 "Review and Audit" of ANS 3.2, draft No. 8 or to provide and justify alternatives to Section 4.0. In addition, we requested CE to implement both the requirements and recommendations of the remaining Sections of ANS 3.2 draft no. 8 or to provide and justify by July 1, 1973, alternatives to these Sections.

In a letter dated April 12, 1973, from William Cahill to R. C. DeYoung, CE stated its intent to implement both the requirements and recommendations of Section 4.0 of ANS 3.2, to evaluate the remaining sections of the standard, and to respond to Regulatory on these remaining sections by July 1, 1973. Pending receipt and final evaluation of this forthcoming response, the staff is unable to conclude that the programmatic aspects of CE's QA Program for the operational phase will satisfy the requirements of Appendix B to 10 CFR 50.

#### AUDITS

The Nuclear Facility Safety Committee (NFSC) will provide an independent review and audit of operations. This will include audits of the adequacy and implementation of all procedures used in the operation, maintenance, and environmental monitoring of each of its nuclear power plants not less than once a year. QA&R will audit compliance with this program and shall be responsible for assuring that necessary corrective actions are implemented. QA&R will also monitor maintenance, modification, and repair activities, principally through the inspection efforts of the on-site QA Engineer. QA&R prepares and distributes a monthly report which identifies significant conditions adverse to quality and corrective actions taken and reports these to appropriate levels of management.

Based on our review of the Indian Point 3 audit program and CE's commitment to implement both the recommendations and the requirements of Section 4 of ANS 3.2, draft 8, we conclude that these audits will provide acceptable management attention to quality and safety related activities during the operational phase and will meet the requirements of Appendix B to 10 CFR 50.

### Conclusions

We have one outstanding item that remains to be resolved in order to complete our evaluation of the QA Program for Indian Point 3. That is our receipt and evaluation of CE's commitments to the remaining Sections (3, 5, and 6) of ANS 3.2, draft No. 8, which is part of Regulatory Guide 1.33. It is our position that CE either commit to and describe implementation of the requirements and recommendations of these sections or provide and justify acceptable alternatives.

Subject to our review and approval of this outstanding item, we conclude that the QA Program for Indian Point 3 described in the FSAR, as amended, complies with the requirements of Appendix B to 10 CFR Part 50 and is acceptable for the operational phase of this facility.