

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

Docket No. 50-286

NEW YORK STATE ATOMIC ENERGY COUNCIL
MOTION FOR AN ORDER DIRECTING APPLICANT
TO PRODUCE WITNESSES COMPETENT TO TESTIFY
ON CERTAIN QUALITY ASSURANCE MATTERS

Dated: March 21, 1975

J. Bruce MacDonald
Deputy Commissioner
and Counsel
NYS Department of Commerce
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At a prehearing conference held at the Springvale Inn in Croton-on-Hudson on February 6, 1975 the Board indicated that there would be a hearing for the presentation of evidence some time after the final Environmental Statement has been issued by the staff (Tr. 202, 232-3) and further that the hearing would include presentations on quality assurance matters (Tr. 218) of both staff (Tr. 218) and applicant witnesses (Tr. 223).

By order dated February 18, 1975 as further amended on February 28th the Board directed the convening of such hearing on April 1, 1975 in Montrose, New York.

Section 274 of the Atomic Energy Act of 1954, as amended, provides among other things, that:

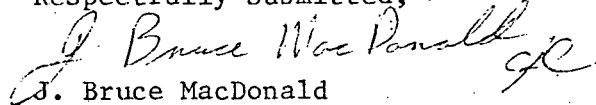
"The Commission...shall afford reasonable opportunity for state representatives to offer evidence, interrogate witnesses and advise the Commission as to the application without requiring such representatives to take a position for or against the granting of the application." (42 USCA 2021[1])

The Commission's regulations further provide that:

"The presiding officer will afford a representative of an interested state that is not a party a reasonable opportunity to participate, introduce evidence, interrogate witnesses and advise the Commission without requiring the representative to take a position with respect to the issues." (10 CFR 2.715[c])

The New York State Atomic Energy Council having received this date copies of correspondence between Applicant and the Regulatory Staff relating to inspection reports for the Indian Point 3 facility, which correspondence was received under cover of a letter dated March 18, 1975 from Michael W. Grainey, Staff Counsel to the Board now moves this Board for an order directing the applicant to present at the April 1, 1975 hearing witnesses competent to respond to the questions on quality assurance matters set out in Attachment I. Noting the Chairman's comments at the last prehearing conference (Tr. 238-40) we further request pursuant to section 274 of the Atomic Energy Act of 1954, as amended, permission to direct the questions set out in Attachment I and any necessary clarifying questions to said witnesses.

Respectfully submitted,



J. Bruce MacDonald
Deputy Commissioner and Counsel
Department of Commerce

DATED: March 21, 1975

ATTACHMENT I

QUESTIONS CONCERNING
QUALITY ASSURANCE MATTERS

Welding Procedures

U.S. AEC inspections conducted during construction note Class A welding procedure discrepancies such as the non-traceability of electrodes for reactor coolant system welding (R.O. Inspection Report 72-01 of March 1972), etc.

1. During the construction phase, how did Con Edison verify that contractors such as WEDCO:
 - a. Utilized Code authorized welding procedures for the joining required?
 - b. Implemented the welding procedures correctly prior to fit up, during fit up, during welding and after welding?

Welding Operation and Controls

Con Edison Quality Assurance General Administrative Directive No. QA-GAD 4 and AD-2 address welding and inspection procedures for the control and welding of Class A components at Indian Point Unit 3 for repair, etc., welding during the operations phase.

1. What similar Quality Assurance Directives, if any, addresses the welding and subsequent inspection of Class B and C components?
2. If there are no written directives or controls, what assurance is provided that Class B and C components will be properly joined?

Pressure Vessel Safe End Cladding

R. O. Inspection Report 286/69-7 (October 1969) stated that cladding, as assurance against chloride stress corrosion, had been added to the nozzles and safe ends of the reactor pressure vessel by Combustion Engineering in

accordance with Westinghouse Welding Procedure # PS 82121LF.

1. Was the cladding plate UT inspected prior to installation in accordance with ASME Code, Section III?
2. Assuming the cladding was austenitic, unstabilized stainless steel:
 - (a) did the Westinghouse Procedure require the use of an electrode (such as SA309, Type M0) for dissimilar metal welding between the clad plate and the carbon steel nozzles? and (b) was a low carbon content electrode (such as SA-298, Type 308L) used for the stainless steel welds to provide resistance to intergranular corrosion?

and

3. Were the cladding welds nondestructively examined?

Installation of Valves

Since future repair activity and operation may be affected, how did the Quality Assurance Program ascertain that valves had been installed in Class A, B and C systems with bridgewall mark orientation in accordance with the flow diagrams or other authorizing documents?

Group B Tubular Products

ASME Code, Section III does not require supplementary non-destructive examination of Group B (those which do not normally confine reactor coolant) tubular (pipe and fittings) products.

1. During construction of Unit 3 what, if any, supplementary nondestructive examination was conducted in Group B (Class B and C) tubular products?
2. Does the Quality Assurance Program provide that repair or conversion Group B tubular products receive examination and if it does by what procedure?

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CERTIFICATE OF SERVICE

I hereby certify that copies of "New York State Atomic Energy Council Motion for an Order Directing Applicant to Produce Witnesses Competent to Testify on Certain Quality Assurance Matters" , in the above captioned matter, have been served on the following by deposit in the United States mail, first class or air mail, this 21st day of March, 1975:

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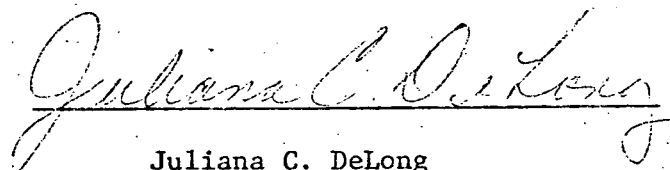
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