

William J. Cahill, Jr.
Vice President

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March 22, 1971

Re AEC Compliance Comments

Mr. Robert W. Kirkman, Director
U.S. Atomic Energy Commission
Division of Compliance
Region 1
970 Broad Street
Newark, New Jersey 07102

Dear Mr. Kirkman

Your letter of February 12, 1971 requests Con Edison comments relative to certain questions resulting from a visit to the Indian Point Unit 3 site by your representatives.

Your questions and our comments are included herein.

AEC Question

Criterion VII, Appendix B, 10CFR50, entitled, "Control of Purchased Material, Equipment, and Services" states in part:

"Documentary evidence that material and equipment conform to the procurement requirements shall be available at the nuclear power plant site prior to installation or use of such material and equipment. This documentary evidence shall be retained at the nuclear power plant site and shall be sufficient to identify the specific requirements, such as codes, standards, or specifications, met by the purchased material and equipment..."

Contrary to the above, the inspectors found that two of the steam generators and four accumulators have been set in place and no documentation relative to the quality of the components was on site.

Con Edison Comment

The subject two steam generators and four accumulators were procured for Indian Point Unit 3 by Westinghouse. The policy of WEDCO

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and Westinghouse on Indian Point Unit 3 with respect to Westinghouse purchased equipment has been that all pertinent quality assurance information would be physically retained by Westinghouse and that Westinghouse would be responsible for ascertaining that the equipment at the time of shipment to the construction site is suitable for installation. WEDCO is responsible for conducting a receiving inspection for shipping damages. Con Edison confirms compliance with these policies via continuous on-site monitoring and off-site auditing. These policies are consistent with the commitments made in the Unit 3 Final Safety Analysis Report Appendix B Quality Assurance Program.

This policy was adhered to in the case of the subject steam generators and accumulators. At the time of installation these components were technically suitable for installation although the documentary quality assurance evidence was physically stored at a location other than at the plant site.

These policies adhered to at Indian Point Unit 3 have historically existed for a number of years and have proven themselves to be efficiently adequate.

Criterion VII, Appendix B, 10CFR50, requires some documentary evidence to be located at the plant site prior to component installation. The intent of this requirement is to assure that the installing organization is aware of any outstanding action that is required that may be precluded by component installation. At Indian Point Unit 3 such potential problems are avoided by communication between Westinghouse and WEDCO when required. In the specific case of the accumulators and steam generators no such communication was necessary since no analogous situation existed. The intent of Criterion VII therefore was met; the particular components that were installed were suitable for installation.

However, to be responsive to the particular 10CFR50 Appendix B Criterion VII regarding location of documentation, the policy of Con Edison as implemented by WEDCO shall be revised as follows effective two months from the date of this letter:

For equipment received at the site after July 27, 1970 (the effective date of 10CFR50 Appendix B), a copy of the below listed documents will be available at the construction site:

1. Equipment Purchase Order
2. Equipment Specification
3. A Quality Release Form

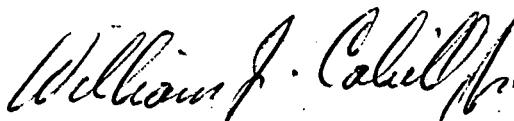
The above documents will be either WEDCO or Westinghouse originated depending on purchase responsibility. The equipment to which this

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policy applies is listed in the Unit 3 Final Safety Analysis Report, Appendix B, Quality Assurance Program. Where quality control documentation is not required by the equipment specification a Quality Release Form will not be required. The above documents will be available prior to equipment installation two months from the date of this letter. Some equipment has already been installed and other equipment may be installed during the two month interval. In these cases the documentation will be available but not necessarily prior to equipment installation.

We believe that these policy changes constitute a positive response to your letter and to the latest Quality Assurance Criteria.

Very truly yours



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Vice President

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CC: Corporate File

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