

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N Y 10003
Telephone (212) 460-3819

July 27, 1972

Re Docket No. 50-286

Mr. James P. O'Reilly, Director
Directorate of Regulatory Operations, Region 1
U.S. Atomic Energy Commission
970 Broad Street
Newark, New Jersey 07102

Dear Mr. O'Reilly

Your June 29 letter requested Con Edison responses to comments made by your inspectors on the installation of Indian Point Unit #3 electrical components and the re-fueling water storage tank during a site audit on May 24 and 25. Con Edison's responses to each of the comments are as follows:

Non-Compliance Items

AEC Comment 1

Criterion III, Appendix B, 10CFR50 states in part, "...Design changes, including field changes shall be subject to design control measures commensurate with those applied by the organization that performed the original design...".

Contrary to the above, cable tray 06QFA was physically attached to cable tray 15LFD. The design drawing, Westinghouse A202452, R-4, prescribes a physical separation of one foot.

Con Edison Response

At the time of the audit, the subject trays were being installed and had not yet been inspected. Subsequently, the trays were inspected. The non-conformance was documented and reviewed by the design agency which has issued instructions to reroute one tray to provide the required separation.

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Con Edison Response (cont'd)

A program has now been established and implemented which provides for systematic documented inspection of the installation of cable trays, conduit, and cable.

AEC Comment 2

Criterion V, Appendix B, 10CFR50 states, "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings. Instructions, procedures or drawings shall include appropriate quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished".

Contrary to the above, there were no procedures pertaining to the inspection of the installation of electrical and instrumentation cable trays, conduit and cable.

Con Edison Response

The program discussed in Answer 1 above addresses itself to the inspection of the important installation facets of cable trays, conduit and cables.

AEC Comment 3

Criterion VII, Appendix B, 10CFR50 states in part, "...documentary evidence shall be retained at the nuclear power plant site and shall be sufficient to identify the specific requirements".

Contrary to the above, the purchaser approved quality control plan and the purchase order were not available on site for use by the quality control inspectors during receipt inspection, fabrication and testing of the refueling water storage tank.

Con Edison Response

A summary of the quality control plans for the refueling water storage tank was available and was used during erection of the storage tank. The summary quality control plan contains all the details required to perform the

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Con Edison Response (cont'd)

necessary inspections and tests on site. The complete tank quality control plan and the tank procurement documentation was inadvertently not distributed to the site initially because instead of procuring the tank via the normal purchase order process, a special contract was issued. The site files now contain the procurement contract and the approved complete tank quality control plan in addition to the summary plan.

This situation is not expected to occur again because the normal procurement process is designed to assure distribution of procurement documentation and quality control information to the site.

Non-Conformance Items

AEC Comment 1a

Wedco Procedure WQA4-0, R-2, paragraph 2.2.e.5 states, "Assure that vendor materials documentation conform to the requirements and intent of the applicable specification".

- a. Contrary to the above, the cable procured for installation inside of containment does not have documentation relative to the continuity resistance or insulation resistance of the particular cable which is on site.

Con Edison Response

A detailed review has been initiated of material documentation applicable to cable purchased for use inside containment. Our review will be of sufficient detail to assure that the cable meets the requirements of the applicable specifications. The results of our review will be made available to your inspectors during a subsequent inspection at Indian Point.

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AEC Comment 1b

Contrary to the above, the 600 volt cable contained documentation which could not be verified as meeting the applicable specification since the documents referenced in the specification were not on site, nor available to the persons performing the inspection.

Con Edison Response

Documents referenced in the specifications necessary for on site inspection, including those applicable to 600 volt cable, are being procured for use on site. When received, the applicable documents will be reviewed to determine whether the 600 volt cable meets specified requirements.

It is not anticipated that any significant additional cable will be procured. However, additional small lot purchases may be made during the remaining construction phases. Particular attention will be paid to any future IP-3 cable procurements to assure that documentation required by specification is available and appropriately reviewed at the site.

AEC Comment 2

The UE&C procedure entitled "Electrical Separation Implementation Design Guide" states in paragraph 1.1.3, "Cable tray channels containing cables for redundant circuits, where possible, shall be separated by three (3) feet vertically or one (1) foot horizontally...Where it is not possible to achieve this degree of separation, metal barriers shall be used to separate the trays".

Contrary to the above, cable tray 59NDA, which is vertically oriented, passes within seven and one-half inches of cable tray 21KFC. Review of Westinghouse drawings shows no requirement for metal barriers.

Jāmes P. O'Reilly
Director

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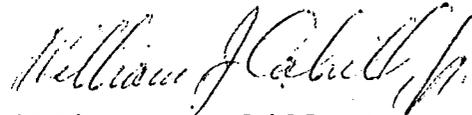
Con Edison Response

The construction and inspection of trays 59NDA and 21KFC had not yet been completed at the time of your inspection and, therefore, our quality control records did not identify the deficiency described by your inspectors.

The apparent deficiency in separation between trays 59NDA and 21KFC has now been verified and a description of the condition transmitted to the designer for resolution or instructions as to corrective action.

The program discussed in response to AEC Non-Compliance Comment 1 above addresses itself to assuring adequate separation of trays or the appropriate alternate use of metal barriers.

Very truly yours



William J. Cahill, Jr.

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