

U.S. ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION I

RO Inspection Report No: 50-286/74-20 Docket No: 50-286
Licensee: Consolidated Edison Company of New York, Inc. License No: CPPR-62
4 Irving Place Priority: _____
New York, New York 10003 Category: B1
Location: _____

Type of Licensee: PWR (W) 1050 MWe

Type of Inspection: Routine, Announced, Q/A Manual Review

Dates of Inspection: September 9-13, October 15-18 and 21-25, 1974

Dates of Previous Inspection: October 21-24, 1974

Reporting Inspector: *W. A. Ruhlman*
W. A. Ruhlman, Reactor Inspector

Nov. 12, 1974
Date

Accompanying Inspectors: *E. C. McCabe, Jr.*
R. B. Glasscock, Reactor Inspector

11/12/74
Date

A. N. Fasano for
A. N. Fasano, Reactor Inspector

11-12-74
Date

Date

Date

Other Accompanying Personnel: _____
Date

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Reviewed By: *E. C. McCabe, Jr.*

11/12/74
Date

E. C. McCabe, Jr., Senior Reactor Inspector
Nuclear Support Section, Reactor Operations Branch

SUMMARY OF FINDINGS

Enforcement Action

None

Licensee Action on Previously Identified Enforcement Items

Not Inspected

Unusual Occurrences

None Identified

Other Significant Findings

A. Current Findings

1. Non-Deficient Items

At the conclusion of the meeting held on October 25, 1974, the following items had no unresolved or open items with respect to the manual review phase of this inspection.

- a. 10 CFR 50, Appendix B, Criterion IV, PROCUREMENT DOCUMENT CONTROL (Detail 5)
- b. 10 CFR 50, Appendix B, Criterion VII, CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES. (Detail 8)
- c. 10 CFR 50, Appendix B, Criterion VIII, IDENTIFICATION AND CONTROL OF MATERIAL, PARTS, AND COMPONENTS. (Detail 9)
- d. 10 CFR 50, Appendix B, Criterion IX, CONTROL OF SPECIAL PROCESSES. (Detail 10)
- e. 10 CFR 50, Appendix B, Criterion X, INSPECTIONS. (Detail 11)
- f. 10 CFR 50, Appendix B, Criterion XI, TEST CONTROL. (Detail 12)
- g. 10 CFR 50, Appendix B, Criterion XV, NONCONFORMING MATERIALS, PARTS OR COMPONENTS. (Detail 16)
- h. 10 CFR 50, Appendix B, Criterion XVIII, AUDITS. (Detail, 19)

2. Open Items

The licensee's actions/answers were defined for each open item. For these items, referenced documents were not provided for review, or actions had not yet been completed, and the necessary RO:I review and evaluation could not be accomplished.

- a. 10 CFR 50, Appendix B, Criterion I, ORGANIZATION. (Detail 2)
- b. 10 CFR 50, Appendix B, Criterion II, QUALITY ASSURANCE PROGRAM. (Details 3a, 3b and 3c)
- c. 10 CFR 50, Appendix B, Criterion III, DESIGN CONTROL. (Detail 4)
- d. 10 CFR 50, Appendix B, Criterion V, INSTRUCTIONS, PROCEDURES, AND DRAWINGS. (Detail 6)
- e. 10 CFR 50, Appendix B, Criterion VI, DOCUMENT CONTROL. (Detail 7)
- f. 10 CFR 50, Appendix B, Criterion XII, CONTROL OF MEASURING AND TEST EQUIPMENT. (Details 13b(2) and 13b(3))
- g. 10 CFR 50, Appendix B, Criterion XIV, INSPECTION, TEST, AND OPERATING STATUS. (Detail 15)
- h. 10 CFR 50 Appendix B, Criterion XVI, CORRECTIVE ACTION. (Detail 17b)
- i. 10 CFR 50, Appendix B, Criterion XVII, QUALITY ASSURANCE RECORDS (Detail 18b)

3. Unresolved Items

The following items are unresolved since the licensee's actions did not provide clear assurance that the issue would be satisfactorily acted upon.

- a. 10 CFR 50, Appendix B, Criterion XII, HANDLING, STORAGE AND SHIPPING. (Detail 13b(1))
- b. 10 CFR 50, Appendix B, Criterion XVI, CORRECTIVE ACTION. (Detail 17c)
- c. 10 CFR 50, Appendix B, Criterion XVII, QUALITY ASSURANCE RECORDS. (Detail 18c)

B. Status of Previous Open Items

Not Inspected.

Management Interview

The inspection of the manual was conducted at the Region I offices in King of Prussia, Pennsylvania. The management interview was held at the licensee's 4 Irving Place, New York, New York offices on October 25, 1974 to clarify positions and to discover any possible answers which had been included in the manual but not recognized by the inspector.

Licensee Attendees

Mr. G. A. Beer, Director of Quality Assurance
Mr. J. C. Mills, Quality Assurance Specialist
Mr. W. A. Monti, Plant Engineer
Mr. R. C. Rossi, Quality Assurance Project Engineer
Mr. C. P. Sophia, Quality Assurance Engineer
Mr. W. J. Thompson, Quality Assurance Consultant
Mr. G. Wasilenko, Manager-Quality Assurance Engineering
Mr. J. S. White, Quality Assurance Project Engineer

Conformance of the quality assurance manual to the eighteen (18) criteria of Appendix B to 10 CFR 50, as broken down by criterion in the report details, was discussed.

DETAILS

1. Persons Contacted During the Meeting

Consolidated Edison Company of New York, Incorporated

Mr. G. A. Beer, Director of Quality Assurance
Mr. J. C. Mills, Quality Assurance Specialist
Mr. W. A. Monti, Plant Engineer
Mr. R. C. Rossi, Quality Assurance Project Engineer
Mr. C. P. Sophia, Quality Assurance Engineer
Mr. W. J. Thompson, Quality Assurance Consultant
Mr. G. Wasilenko, Manager-Quality Assurance Engineering
Mr. J. S. White, Quality Assurance Project Engineer

2. 10 CFR 50, Appendix B, Criterion I, ORGANIZATION

a. Requirement

"....The authority and duties of persons and organizations performing quality assurance functions shall be clearly established and delineated in writing....."

b. Finding

Questions with respect to the quoted section of Criterion I resulted in the following commitment which will, according to the licensee, be incorporated as a program requirement.

- (1) The Director of Quality Assurance, or his designated alternate, shall review all administrative documents which define and/or control the implementation of the Quality Assurance Program in a timely and expeditious manner to assure that quality assurance principles are included and implemented. If the review identifies improper or inadequate quality assurance practices or principles, the QA Director has the authority and the responsibility to assure the documents' revision to eliminate improper practices and/or include adequate requirements.

c. Status

This open item will be verified for completion and reviewed for adequacy in achieving the required results during the implementation phase of the inspection.

3. 10 CFR 50, Appendix B, Criterion II, QUALITY ASSURANCE PROGRAM

a. Control

(1) Requirement

"....The quality assurance program shall provide control over activities affecting the quality of the identified structures, systems, and components, to an extent consistent with their importance to safety...."

(2) Finding

The inspector stated that the multiplicity of overlapping procedures and the attendant cross-referencing requirements made the manual review difficult creating some concern with respect to the ability of the current program to effectively control activities as required by Criterion II.

The licensee acknowledged that the program was somewhat difficult to review having received similar comments from the in-house review prior to submission of the program to RO:I. However, the licensee stated that current program arrangement had not produced control problems in actual use of the manual. The licensee also stated that the program was currently being reviewed to ensure proper and adequate cross-referencing and to eliminate procedures where combination of similar procedures was possible.

b. Training

(1) Requirement

"....The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained...."

(2) Finding

The training procedures included in the material furnished for review did not adequately address all of the training required by section 5.4 of ANSI N18.1-1971 and by 10 CFR 19, section 19.12. The method used to evaluate prescribed training was not always specified.

The licensee stated that all training given was not included in the submission of procedures given to RO:I as part of the Quality Assurance Program, that the specific deficiencies enumerated by the inspector were addressed in procedures and practices documented and available at the Indian Point site.

c. Review

(1) Requirement

"....The applicant shall regularly review the status and adequacy of the quality assurance program...."

(2) Finding

The program submitted for review did not include specific program review requirements sufficient to satisfy the quoted section of Criterion II.

The licensee stated that the program would be revised to include a requirement that the Quality Assurance and Reliability (QA&R) Department shall regularly review the quality assurance program to determine status and adequacy.

d. Status

The completion of the indicated commitment and the adequacy of the proposed solutions and indicated records will be reviewed during the implementation phase of the inspection. These items are open.

4. 10 CFR 50, Appendix B, Criterion III, DESIGN CONTROL

a. Requirement

"....Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design...."

b. Finding

The quoted section of Criterion III and the requirement that training programs assure that suitable proficiency be achieved and maintained (see 3b above) require that design changes be factored into the various training programs. The FSAR also states

(Section 12.2.4, page 12.2-3, Supplement 7 dated July 1972) that future Indian Point Plant modifications will be factored into the training programs. While most training programs have the specific requirement to include such changes, the Nuclear Plant Operator (NPO) program did not. The licensee stated that this item will be included as required.

c. Status

This item is open.

5. 10 CFR 50, Appendix B, Criterion IV, PROCUREMENT DOCUMENT CONTROL

No deficiencies were identified with respect to this criterion during the manual review phase of this inspection.

6. 10 CFR 50, Appendix B, Criterion V, INSTRUCTIONS, PROCEDURES, AND DRAWINGS

a. Requirement

"Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...."

b. Finding

Several specific procedures required by the licensee's Technical Specifications, or by standards (ANSI 18.7, Regulatory Guide 1.33) to which he is committed, were not included in the package submitted for RO:I review. In each case, the licensee stated that an approved procedure was available for the subjects requested and was currently available at the site.

c. Status

This open item will be verified as part of the implementation phase inspection.

7. 10 CFR 50, Appendix B, Criterion VI, DOCUMENT CONTROL

a. Requirement

"....These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed...."

b. Findings

Inspector concern about review for adequacy developed because the Director of Quality Assurance was not on the distribution list for all quality assurance procedures.

The licensee stated that, even though he was not officially listed for distribution, the Director of Quality Assurance did receive copies of all quality assurance procedures. In addition, the Director had been placed on the distribution of an approved procedure (QA GAD-12) furnished to RO:I at the meeting to replace the draft procedure included with the original submittal.

However, revision of all of the program documents to include the new distribution requirement had not been made as of October 25, 1974. The licensee also stated that the Director of Quality Assurance will be included in the distribution of all administrative documents defining and/or controlling the implementation of the quality assurance program. These documents will also be reviewed for adequacy as previously documented. (Detail 2)

This item will be reviewed during the implementation phase of this inspection. This item is open.

8. 10 CFR 50, Appendix B, Criterion VII, CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

No deficiencies were identified with respect to this criterion during the manual review phase of this inspection.

9. 10 CFR 50, Appendix B, Criterion VIII, IDENTIFICATION AND CONTROL OF MATERIAL, PARTS, AND COMPONENTS

At the outset of the meeting, the licensee furnished the inspector with a revised page (51R, item 3.6, dated 9/12/74) of procedure CI-204-1 which satisfied the problem identified with respect to maintaining the identity of items during the RO:I review. With the resolution of this item, no deficiencies remain with respect to this criterion as a result of the manual review phase of the inspection.

10. 10 CFR 50, Appendix B, Criterion IX, CONTROL OF SPECIAL PROCESSES

No deficiencies were identified with respect to this criterion during the manual review phase of this inspection.

11. 10 CFR 50, Appendix B, Criterion X, INSPECTIONS

No deficiencies were identified with respect to this criterion during the manual review phase of this inspection.

12. 10 CFR 50, Appendix B, Criterion XI, TEST CONTROL

No deficiencies were identified with respect to this criterion during the manual review phase of this inspection.

13. 10 CFR 50, Appendix B, Criterion XII, CONTROL OF MEASURING AND TEST EQUIPMENT

a. Requirement

"Measures shall be established to assure that tools, gages, instruments, other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

b. Findings

(1) Permanently Installed Equipment

The program did not address the calibration and controls required for permanently installed testing and measuring equipment, meters and gages other than those requiring surveillance testing under the Technical Specifications.

This item is unresolved.

(2) Controlled/Calibrated Instrumentation

Some of the licensee's procedures require the use and recording of designation of controlled and calibrated instrumentation during tests, inspections and maintenance activities. The licensee stated the procedures controlling the preparation and content of all quality related procedures, where instruments are required to be controlled, would be modified to include requirements to use only controlled and calibrated equipment and to record the serial number or other appropriate identification of the instrument used.

(3) Procedures

The procedures covering the methods used to control and calibrate various instrumentation items were not included as part of the submitted package. These procedures were, according to

the licensee, currently in use at the plant site. This item will be reviewed during the site visit as part of the implementation phase of the inspection.

c. Status

Permanently installed equipment calibration/control is unresolved. Use of controlled and calibrated instrumentation, and control/calibration procedures, are open items.

14. 10 CFR 50, Appendix B, Criterion XIII, HANDLING, STORAGE AND SHIPPING

a. Requirement

"Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration. When necessary for particular products, special protective environments, such as inert gas atmosphere, specific moisture content levels, shall be specified and provided."

b. Finding

The controlling policy procedure CI-240-1 addresses the general requirements of this criterion (VII, 3.4, pages 59,60). However, the only implementing procedure currently written, QA-AD-21, does not adequately cover the requirements.

The licensee acknowledged the inspector's statement and stated that procedures covering the requirements were currently being written.

c. Status

Since these procedures have not yet been written or approved, this item is unresolved.

15. 10 CFR 50, Appendix B, Criterion XIV, INSPECTION, TEST, AND OPERATING STATUS

a. Requirement

"Measures shall also be established for indicating the operating status of structures, systems, and components of the nuclear power plant, such as by tagging valves and switches, to prevent inadvertent operation."

b. Finding

Although the specific procedures and instructions needed to satisfy

the requirements of this criterion were not submitted as part of the review package, the licensee stated for each item raised by the inspector, that a procedure or instruction covering the item was in use and available at the plant site.

c. Status

This open item will be reviewed during the implementation phase of the inspection.

16. 10 CFR 50, Appendix B, Criterion XV, NONCONFORMING MATERIALS, PARTS OR COMPONENTS

No deficiencies were identified with respect to this criterion during the manual review phase of this inspection.

17. 10 CFR 50, Appendix B, Criterion XVI, CORRECTIVE ACTION

a. Requirement

"Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective actions taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective actions taken shall be documented and reported to appropriate levels of management."

b. Procedure QA-GAD-2 Finding

Procedure QA-GAD-2 had several words and phrases which appeared to be contrary to the requirements of this criterion. When this was brought to the attention of the licensee, a copy of the procedure was modified to eliminate the ambiguities and will be, according to the licensee, issued as a revision to the procedure.

c. Identification of Trends Finding

The licensee's manual described procedures, forms and processes whereby failures, out-of-specification readings/items, and deficiencies are documented, reported, analyzed and reviewed. The current program does not provide for review of routine items to identify conditions which, taken individually may not be significant, but when taken collectively become tendencies or trends

which, while not yet out of specifications, portend failures, malfunctions or deviations.

d. Status

This open QA-GAD-2 item will be reviewed during the implementation phase of the inspection. Identification of trends is an unresolved item.

18. 10 CFR 50, Appendix B, Criterion XVII, QUALITY ASSURANCE RECORDS

a. Requirement

"...Records shall be identifiable and retrievable. Consistent with applicable regulatory requirements, the applicant shall establish requirements concerning records retention, such as duration, location, and assigned responsibility."

b. Supplemental Information and Superseded Documents Finding

The licensee's method(s) for filing supplemental information and disposing of superseded documents and the responsibility for performing these tasks were not described in the program. The licensee stated that methods and responsibilities will be developed, defined, and included in the program.

c. Storage Finding

The assigned responsibility for ensuring that records received for storage are in agreement with any attendant transmittal documents was not addressed in the program.

The licensee stated that, in his opinion, this check and verification was not required by 10 CFR 50, Appendix B but that the matter will be reviewed.

d. Status

The open item on supplemental information and superseded documents will be reviewed during the implementation phase of this inspection. The storage responsibility issue is unresolved.

19. 10 CFR 50, Appendix B, Criterion XVIII, AUDITS

No deficiencies were identified with respect to this criterion during the manual review phase of this inspection.