

John D. O'Toole
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
Telephone (212) 460-2533

Letter No. 81-130

July 31, 1981

Re: Indian Point Unit No. 2
Docket No. 50-247

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Mr. Darrell G. Eisenhut, Director
Division of Licensing



Dear Mr. Eisenhut:

Your Generic Letter 81-01 dated May 4, 1981 requested licensees, including Con Edison to commit to Regulatory Guide 1.146 dated August 1980 regarding qualification of audit personnel, and certain regulatory positions in Regulatory Guide 1.58 Rev-1, dated September 1980, regarding qualification of inspection, examination, and testing personnel.

With regard to Regulatory Guide 1.146, Con Edison agrees to implement by September 30, 1981 its provisions as modified by the alternates/interpretations/exceptions shown in Table A (attached). The Con Edison QA Program description dated June 1977 will be revised to reflect this commitment and will be submitted to the NRC in accordance with my letter to Steven A. Varga, dated March 11, 1981.

With regard to Regulatory Guide 1.58, Con Edison, in letters dated May 23, 1980; July 15, 1980 and March 11, 1981 respectively, described the qualification requirements of Quality Assurance personnel who perform inspections, examinations and tests. These letters were submitted in response to NRC letters concerning an ongoing overall QA program review by NRC, and contain additional information concerning this subject. We believe that Generic Letter 81-01 was developed independent of the ongoing NRC evaluation of Indian Point Unit No. 2, and our previous responses to the questions raised by that evaluation.

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We therefore request that an NRC evaluation of our previous responses on this subject be completed before we initiate further review of the provisions of Regulatory Guide 1.58 which address much the same subject matter.

Should you or your staff have any additional questions please contact us.

Very truly yours,

A handwritten signature in cursive script, reading "John D. O'Toole", with a long horizontal flourish extending to the right.

John D. O'Toole
Vice President

TABLE A

<u>Item No.</u>	<u>ANSI STD REF</u>	<u>REQUIREMENT</u>	<u>INTERPREATION/ALTERNATE/EXCEPTION</u>
1.	1.4.3	Audit. A documented activity performed in accordance with written procedures or checklists to verify, by examination and evaluation of objective evidence, that applicable elements of the quality assurance program have been developed, documented, and effectively implemented in accordance with specified requirements. An audit should not be confused with surveillance or inspection for the sole purpose of process control or product acceptance.	The requirements of ANSI 45.2.23 apply to personnel who perform audits involving QA Program elements. They do not apply to personnel who perform audits involving compliance with Technical Specifications in areas such as Auxiliary Electrical Systems, Steam & Power Conversion and Containment Integrated Leak Testing etc.; nor to personnel who perform vendor evaluations or surveillance.
2.	2.3.1.1	"...in addition score one(1) credit for a master degree in engineering, physical sciences, business management, or quality assurance from an accredited institution."	Also score one(1) credit for a Masters Degree in mathematics
3.	2.3.1.2	"...if two(2) or more years of this experience have been in quality assurance, score two(2) additional credits, or..." "...if two(2) or more years of this experience have been in nuclear quality assurance, score three(3) additional credits, or..."	Also score two(2) additional credits for two(2) or more years reliability experience Also score three(3) additional credits for two (2) or more years nuclear reliability experience

TABLE A

<u>Item No.</u>	<u>ANSI STD REF</u>	<u>REQUIREMENT</u>	<u>INTERPRETATION/ALTERNATE/EXCEPTION</u>
4.	2.3.1.3	"...Certification of competency in engineering, science, or quality assurance specialties issued and approved by a State Agency, or National Professional or Technical Society, score two (2) credits."	Also score two(2) credits for ASQ certification as a Reliability Engineer
5.	2.3.2	"...The prospective Lead Auditors shall have the capability to communicate effectively, both written and oral. These skills shall be attested to in writing by the Lead Auditor's employer."	Separate attestation regarding communications skill shall not be made. Designation as Lead Auditor shall constitute indication of adequate communication skill.
6.	2.3.3	"...Prospective Lead Auditors shall have training to the extent necessary to assure their competence in auditing skills."	Previous on-the-job training at prior companies, organizations or Con Edison shall constitute credit towards Lead Auditor designation. Contractor personnel used as Lead Auditors shall be certified by their employers whose training program shall have been reviewed by Con Edison.
7.	2.3.4	"The prospective Lead Auditor shall have participated in a minimum of five(5) quality assurance audits within a period of time not to exceed three(3) years prior to the date of qualification, one audit of which shall be a nuclear quality assurance audit within the year prior to his qualification."	Participation in vendor QA program evaluations, vendor surveillance, site QA/QC monitoring, or ASME "N" stamp nuclear surveys, shall constitute credit towards meeting this requirement.

TABLE A

<u>Item No.</u>	<u>ANSI STD REF</u>	<u>REQUIREMENT</u>	<u>INTERPRETATION/ALTERNATE/EXCEPTION</u>
8.	2.3.5	"...The prospective Lead Auditor shall pass an examination which shall evaluate his comprehension of and ability to apply the body of knowledge identified in paragraph 2.3.3	Audit management may waive the requirements of ANSI N45.2.23, paragraphs 2.3.4 & 2.3.5 requiring participation in audits and examination, when the individual has demonstrated, by past experience and/or knowledge, an obvious capability to conduct audits.
9.	3.2	"Lead Auditors shall maintain their proficiency through one or more of the following: regular and active participation in the audit process; review and study of codes, standards procedures, instructions, and other documents related to quality assurance programs and program auditing; participation in training programs. Based on management annual assessment, management may extend the qualification, required training, or require requalification. These evaluations shall be documented."	Participation in vendor QA Program evaluations, vendor surveillance, site QA/QC monitoring, or ASME "N" stamp nuclear surveys, shall constitute credit towards maintenance of proficiency. Documented annual assessment of auditors is not required for personnel whose ongoing responsibilities include auditing, vendor evaluation, vendor surveillance, site QA/QC monitoring, or ASME nuclear surveys
10.	3.3	"Lead Auditors who fail to maintain their proficiency for a period of two years or more shall require requalification. Requalification shall include retraining in accordance with the requirements of paragraph 2.3.3, reexamination in accordance with paragraph 2.3.5, and participation as an Auditor in at least one nuclear quality assurance audit."	Management shall determine the basis for requalification on a case-by-case basis, and may elect to waive retraining, reexamination and audit participation based upon a review of the individual's knowledge capability prior performance and recent experience.