

**Murray Selman**  
Vice President

Consolidated Edison Company of New York, Inc.  
Indian Point Station  
Broadway & Bleakley Avenue  
Buchanan, NY 10511  
Telephone (914) 737-8116

March 31, 1987

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

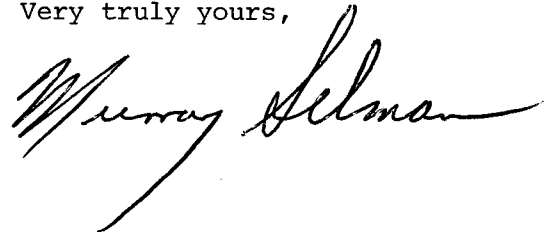
Dr. Thomas E. Murley  
Regional Administrator - Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Dear Dr. Murley:

This letter documents our responses to questions presented during a March 10, 1987 telephone conversation between P.K. Eapen, G. Napuda and J. Hunter of your staff and W. Monti, J. Mills and R. Weinsberg of Consolidated Edison. The questions were regarding our Quality Assurance Program, Revision - 4, dated November 19, 1986 and submitted to you under cover of our letter dated December 29, 1986. Attached is a list of the questions posed and our responses. We are of the view that none of the QA Program changes addressed by these questions, nor the other changes identified in QA Program Revision - 4, diminishes a previous commitment or has an adverse affect on quality or safety.

Should you require further information please contact Mr. W.A. Monti on (212) 460-2779.

Very truly yours,



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Attachment

cc: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 38  
Buchanan, NY 10511

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ATTACHMENT

Responses to NRC questions presented during the March 10, 1987 telecon regarding the Quality Assurance Program description.

Question:

Is the change in reporting of the Director, Quality Assurance from a Vice President to the Director, Power Generation Services a downgrade?

Response:

No. The Director, Power Generation Services reports directly to the Executive Vice President Central Operations just as the previous Vice President, Nuclear Engineering and Quality Assurance & Reliability. The Company does not presently have a Vice President, Nuclear Engineering and Quality Assurance & Reliability. The Director, Power Generation Services retains the necessary degree of independence to continue to carry out the mission of QA as defined in 10 CFR 50B and other applicable regulations. This reporting change in no way compromises that mission or independence. Furthermore, any changes to the QA program must be approved by the Executive Vice President Central Operations, as stated in the Quality Assurance Program description page 2, 5th paragraph.

Question:

Why was the last sentence removed from the first paragraph on page 4?

Response:

This sentence addressed Quality Assurance responsibilities and was inappropriate in a paragraph stating the responsibilities of the Nuclear Facilities Safety Committee (NFSC). The functions of Quality

Assurance at Indian Point are outlined on page 3, fourth paragraph, and page 40, Section 5.2.17, as well as other parts of the Quality Assurance program description.

Question:

Why was "detection of trends" removed from page 8?

Response:

The paragraph in question addresses the function of the Station Nuclear Safety Committee (SNSC) which is not responsible for such trending. This is a function of the audit program and other measurements activities. Trend analysis relative to the audit program is addressed in page 37, paragraph 5.2.14, last sentence. The Quality Assurance Audit organization publishes semi annual and annual reports which include trend information. QA&R also publishes a quarterly report on significant unresolved nonconformances as described on page 26, fourth paragraph. This report shows corrective action trends. The fifth bullet on page 9 was added to show that SNSC reviews various aspects of plant operation to detect problems before they happen.

Question:

Why was "stop work authority" taken away from inspectors?

Response:

This change placed "stop work authority" in the most appropriate organization and management level and is designed to assure that work will be stopped when appropriate and not stopped for unsound reasons. The inspector may still recommend work stoppage by informing the work supervisor of a nonconformance or other adverse condition that may warrant stopping the work. The supervisor may stop work voluntarily

at this point. This places the responsibility with the line organization and precludes inappropriate work stoppages which might be directed by a Con Edison or contractor inspector. In the case of a disagreement between an inspector and a supervisor, the inspector may immediately notify the Manager, Nuclear Power Quality Assurance who has the authority to stop work as provided in the Quality Assurance program description.

Question:

What happened to the Chief Nuclear Engineer position?

Response:

Upon termination of the position of Vice President Nuclear Engineering and QA&R the following reorganization occurred.

- ° Nuclear Engineering was transferred to Nuclear Power.
- ° Quality Assurance & Reliability was transferred to Power Generation Services.

The Chief Nuclear Engineer assumed the position of General Manager Technical Support at Indian Point. Nuclear Engineering and Technical Support were combined into one organization. The General Manager Technical Support reports directly to the Vice President, NP.

Question:

Why are the Shift Technical Advisors not shown on the organization chart?

Response:

The Shift Technical Advisors (STA's) formerly reported directly to the General Manager Technical Support. Thus these positions were shown in a box on the organization chart reporting directly to the General

Manager, Technical Support. For administrative and efficiency reasons STA's job now report to the Test and Performance Manager as shown on the chart. The STA's job functions, and independence remain the same.

Question:

Why is the Senior Reactor Engineer not shown on the organization chart?

Response:

The Senior Reactor Engineer formerly reported directly to the General Manager Technical Support. Thus this position was shown in a box on the organization chart reporting directly to the General Manager Technical Support. For administrative and efficiency reasons this position now reports to the Nuclear Analysis Manager. The Senior Reactor Engineer's job functions and independence remain the same.

Question:

Why is the Major Projects Manager not shown on the organization chart?

Response:

The Major Projects Manager formerly reported directly to the General Manager Technical Support. This position was shown in a box on the organization chart reporting directly to the General Manager Technical Support. For reasons of improved efficiency and effectiveness this position has been eliminated and the associated functions assigned to the Projects and Planning Manager, who reports directly to the General Manager Nuclear Power Generation.

Question:

Why is the Safety Administrator not shown on the organizational chart?

Response:

The Safety Administrator formerly reported directly to the General Manager Administrative Services. Thus this position was shown in a box on the organization chart reporting directly to the General Manager Administrative Services. For administrative, effectiveness and efficiency reasons this position now reports to the Fire Protection, Safety and Security Manager. The Safety Administrator's job functions, freedom and independence remain the same.