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May 31, 1990

Re: Indian Point Station
Docket No. 50-247

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

SUBJECT: Quality Assurance Program Description (QAPD) Revision 7

Per discussion with your staff, we are submitting as Attachment I to this letter information supplementing our Quality Assurance Program Description (QAPD) Revision 7 which was submitted December 27, 1989. This information is in the form of questions and answers. We intend to incorporate the information in Attachment 1 into the QAPD during the normal yearly update to the QAPD later this year.

Additionally, we are submitting changes to QAPD pages 5 and 25. These involve minor changes in organizational responsibilities related in inservice inspection and are discussed in Attachment II of this letter. Certain inservice inspection responsibilities are currently performed by our Quality Assurance organization. We are evaluating these responsibilities with the intent of transferring them to Nuclear Power in the future. We have performed a 10 CFR 50.54(a)(3) review and have determined that these organizational responsibility changes do not constitute a "reduction in commitment" per 10 CFR 50.54(a)(3).

Should you have any questions, please contact Mr. Charles W. Jackson, Nuclear Safety and Licensing.

Very truly yours,



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ATTACHMENT 1

ADDITIONAL INFORMATION

CONSOLIDATED EDISON - INDIAN POINT 2

QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD) - REVISION 7

1. The new sentence on page 4, "Nuclear Power engineering also prepares and issues documents associated with minor modifications," raises several questions:

- a. Where is "Nuclear Power engineering" within the organization?
- b. Is it shown on the organization charts? Should it be?
- c. Are the "documents associated with" minor modifications the same as "Modification Packages" referred to at the bottom of page 2 of Attachment II?
- d. Is "Nuclear Power engineering" the same as "Nuclear Power Systems Engineering" referred to at the bottom of page 2 of Attachment II?

Please clarify the QAPD to eliminate these questions.

ANSWER:

- 1a. & 1b. "Nuclear Power engineering" referred to on page 4 is the same as the group identified as "Technical Engineering" in the organization chart B following Appendix A of the Quality Assurance Program Description (QAPD) Revision 7. The latest official name for this group is "Plant Engineering".
- 1c. The intent of the sentence on page 4 is to clarify that Plant Engineering (Nuclear Power Engineering) may prepare documentation associated with plant modifications in addition to Corporate Engineering (Engineering). The term "modification packages" on page 2 of Attachment II is a generic term which describes documentation associated with plant modifications. The categories of modifications are described in the revised paragraph developed in response to question 7.
- 1d. "Nuclear Power engineering" is the same as "Nuclear Power Systems Engineering" referred to at the bottom of page 2 of Attachment II. The latest official name for this group is "Plant Engineering".

The QAPD will be clarified as necessary to eliminate the above questions. The QAPD will also be editorially revised in its entirety, as necessary, to assure the use of consistent terminology for the identification of organizational entities and position titles. Organization charts will also be clarified. It is intended to revise the QAPD to reflect the above clarification as part of the normal yearly update of the QAPD during 1990.

2. To clarify responsibilities, indicate briefly what a supervisor's responsibilities are when an employee reports a deficiency on plant equipment or structure. (See page 18, top.)

ANSWER:

When an employee reports a deficiency on plant equipment or structures to his supervisor, the responsibilities of the supervisor include facilitating processing of the deficiency via the plant computerized work order tracking system.

This responsibility will be incorporated into the QAPD revision text during the normal yearly update.

3. The third paragraph on page 18 addresses the review of all work orders by the Test and Performance Engineer (or designee).

- a. Is this the "independent" review of work orders?
- b. Where in the organization is the Test and Performance Engineer? Is there more than 1?
- c. The wording of the second sentence indicates that the review by the Test & Performance Engineer is done between the time the work is completed and the time the item is tested. Is this the case?
- d. The last sentence of this paragraph states: "When post maintenance testing is required, it is so indicated on the work order." Who (by position title) or what organization is responsible to indicate this on the work order, and who is responsible to verify that the work order is correct in this regard?

ANSWER:

- 3a&b. The term "Test and Performance Engineer" (T&PE), refers to the manager of "Test and Performance" (T&P), a group consisting of a manager, test engineers and a test supervisor(s) who stipulate post-maintenance test requirements and supervise equipment testing. The review of work orders by T&P constitutes an independent review in that the T&PE reports to the Chief Plant Engineer. The Chief Plant Engineer reports to the General Manager Technical Services who is independent of the GM Nuclear Power Generation who is responsible for plant operation.
- 3c. The review of work orders by T&P typically occurs prior to the start of work, however, if after the start of work, the work scope changes (e.g., to suit field conditions), T&P reviews the revised scope to determine revised testing requirements.
- 3d. T&P is the group responsible for identifying Post-Maintenance Testing (PMT) requirements on the work order. This is accomplished by entering them in the computerized work order tracking system. The manager of T&P is responsible for supervising T&P to assure that the PMT requirements are accurately and completely entered in the system. Additionally, PMTs are reviewed by Watch Engineers from the plant Operations staff to assure that they are appropriate.

4. The next paragraph states: "The Test & Performance Engineer prepares Post Maintenance Testing... ." Please clarify what this means.

ANSWER:

The phrase "The Test & Performance Engineer prepares Post Maintenance Testing... ." means that T&P stipulates PMT requirements and prepares and issues PMT procedures. See also preceding answers to questions 3a. through 3d.

5. The last paragraph on page 18 states: "Projects and Planning (or Instrumentation and Controls, as appropriate..." has several functions regarding work orders.

- a. Does the responsibility to update, change, or add information make these organizations responsible for the correctness of the work order?
- b. Is there an independent review of the work order after the updating, changing, or adding information is complete, or is this work supposed to be the independent review?
- c. What is the significance of the parenthetical expression, "which are the responsibilities of NPG," in this paragraph? (What does "which" refer to?)

ANSWER:

5a.&b. The work order is the mechanism by which station personnel can identify conditions in the field which require corrective work. The initiator of the work order is responsible for the correctness of the information which he identifies e.g., the nature of the condition which requires corrective work. The work order is reviewed by the Operations Manager who approves the implementation. The necessary additional work implementing documents are developed by Projects and Planning (or I&C) who are responsible for the correctness of the work order and implementing documents. The work implementing documents consist of the work order and one or more of the following depending on job complexity: check-lists, step-lists, procedures, sketches, drawings, etc. The work implementing documents, developed by Projects and Planning (or I&C) are reviewed for adequacy and correctness by a qualified person other than the preparer. This latter review constitutes the independent review.

5c. The significance of the parenthetical expression is that it qualifies the sentence in which it is contained. Specifically, Projects and Planning (or I&C) prepare work implementing documents for those work projects managed by Nuclear Power. In the case of other projects (e.g., major capital projects) managed by the Consolidated Edison Construction Department, the work implementing documents would typically be developed by outside contractors under the controls of their QA program.

6. The note at the bottom of page 18 states: "Projects and Planning has no responsibilities for those orders being controlled by I&C."

- a. Who (by position title) is responsible to specify which organization is responsible for the work of the last paragraph for a given work order?
- b. Does I&C have any responsibilities for the orders being controlled by Projects and Planning? That is, is the reverse of the note true? Please clarify.

ANSWER:

- 6a. The Operations Manager, or his designee, specifies which organization, Projects and Planning or Instrumentation and Control, is responsible for the work on a given work order. Questions involving the assignment of these responsibilities are resolved by managers of the respective groups, or their designees.
- 6b. I&C does not have responsibilities for orders controlled by Projects and Planning.

7. The 1 & 1/4 page paragraph concerning modifications on pages 19 - 20 needs editing. It appears that modifications are classified as major or minor by someone. Then someone assigns the preparation of modification documents to one of three engineering organizations (Central Engineering, Field Engineering, or Nuclear Power systems Engineers - with Central Engineering not getting involved in minor modifications). Plant personnel get involved somehow with the engineering work, and a package of modification documents appears from the assigned engineering organization. Someone apparently assigns a different organization (Projects and Planning, I&C, or an organization in the Construction Department) to put together a work package based on these documents. The work package, it appears, is then used to control the actual modification, with the Test & Performance Engineer again getting involved in post modification testing (see items 3 & 4 above). Please edit the paragraph, clarifying the assignment of responsibilities for doing the work and for verifying the correctness of the work.

ANSWER:

The subject paragraph has been rewritten and is attached. The attached paragraph is intended to clarify and replace page 19 and the applicable portion of page 20 of the QAPD revision 7. When this change is incorporated into the normal yearly update of the QAPD all of section 5.2.7 will be editorially clarified.

5.2.7 Maintenance and Modifications

When the work constitutes a modification to the plant, modification documentation is prepared by either Engineering or Plant Engineering. The assignment to one organization or the other is made by the Chief Plant Engineer in consultation with Engineering, as necessary. The organizational assignment is based primarily on job complexity (e.g., scope and design impact) with the more complex jobs generally assigned to Engineering.

A Discipline Engineer within the designated organization is assigned responsibility to prepare the modification documentation. The Discipline Engineer determines how the modification documentation should be developed and processed as one of the following:

- o Modification (major) - a plant change that modifies plant design.
- o Minor modification - a plant change where the replacement equipment is adequate for its use, results in limited installation impact (e.g., no adverse seismic affect) and does not alter the system process or function.
- o Determination of Equivalency (DOE) - an evaluation which determines that a replacement component is an equivalent replacement and is suitable for installation. DOEs are not used for modifications to Environmentally Qualified (EQ) equipment.

Documentation developed for major modification includes, as applicable, the following:

- o Design criteria.
- o Concept and scope.
- o Supporting calculations.
- o Specifications, drawings.
- o Prerequisites and corequisites.
- o Special test requirements, acceptance criteria.
- o Flushing/cleaning.

5.2.7 Maintenance and Modifications (cont'd)

- o Welding.
- o Special precautions.

Minor modification documentation includes the above, as applicable, except that new design criteria are not established.

DOE documentation provides justification for a determination of equivalency.

The modification documentation is prepared and approved by the Discipline Engineer. Additionally, the modification documentation is reviewed and approved by a qualified Engineer other than the preparer. This additional review is to assure that the modification documentation is technically correct and that appropriate quality provisions (e.g., non-destructive examinations) are specified.

Affected plant functions perform critical reviews of the modification documentation. These include the systems engineer, operations, training, test and performance engineer, computer applications engineer, and environmental qualification engineer. Generally, these reviews are intended to verify that modification documentation includes adequate technical guidance and criteria, to evaluate the impact of the modification in their respective areas of responsibility, to support determination of post-modification testing requirements, to assure consistency with the Plant Technical Specifications, to assure that applicable safety evaluation requirements have been satisfied and to account for radiological control requirements.

After the modification documentation is issued for implementation the necessary installation work procedures are prepared. Projects and Planning prepares work procedures associated with most plant modifications. I&C prepares work procedures, as necessary, to implement modifications to installed instrumentation. Work may also be assigned by Projects and Planning to Consolidated Edison's Construction Department which typically engages contractors to prepare work procedures.

The work documentation is reviewed by personnel other than the documentation preparer to assure that the documents are complete and correct.

5.2.7

Maintenance and Modifications (cont'd)

Verification of work during and after installation extends to performance of inspections, tests, when applicable, nondestructive examination, recording as-constructed information, status indication, pressure testing, when applicable, and by other appropriate means.

Test and Performance is responsible for preparing post-modification test procedures, evaluating test results, and informing Operations personnel of acceptability of the test results.

Records of the completed work package are filed. Examples of the types of records are the job folder, results of inspections or tests, modification documents, maintenance work order, reference to other documents and close-out documentation. Similar controls apply to preventive, routine and corrective maintenance, as appropriate.

8. The last sentence on page 30 states: "Quality assurance requirements are imposed on contractors... ." Similarly, the last sentence of the second paragraph on page 42 states: "Mandatory independent inspection hold points are identified on the traveler." Please clarify who (by position titles) or what organizations are responsible for these activities.

ANSWER:

The last sentence on page 30 states that quality assurance requirements are imposed on contractors.

Source evaluations by QA identify vendor QA programmatic requirements to be included in procurement documents.

Currently QA identifies additional quality assurance requirements specific to a particular procurement document, or reviews procurement documents to verify inclusion of appropriate quality requirements. However, it is planned to revise administrative procedures to stipulate that both the identification of additional specific requirements and a review for adequacy be done by and within line organizations responsible for procurement (e.g., Nuclear Power and/or Construction). The minimum programmatic consideration will be that the procurement documents be written by qualified personnel and reviewed for adequacy by a qualified person other than the preparer.

The last sentence, second paragraph, page 42 states independent inspection hold points are identified on a traveler.

Currently QA identifies inspection hold points in work documentation or reviews work documentation to verify inclusion of appropriate inspection hold points. However it is planned to revise administrative procedures to stipulate that both the identification of hold points and a review for adequacy be done by line organizations responsible for preparing work documentation (e.g., Nuclear Power and/or Construction). The minimum programmatic consideration will be that the work documentation be written by qualified personnel and reviewed for adequacy by a qualified person other than the preparer.

9. The first paragraph on page 31 appears to be unchanged from Revision 6. Please clarify.

ANSWER:

The 3rd sentence in the subject paragraph should read "As appropriate, quality assurance program provisions are evaluated by QA."

The intent of this change is to clarify that vendors exceptions to quality assurance program procurement provisions, which have been stipulated by QA as a result of source evaluation activities, shall be evaluated by QA.

10. The note on page 5 of Appendix A indicates the Appendix B QA program will be applied to the AMSAC unless an aspect of the program "prove(s) overly restrictive." Identify who (by position title) or what organization has the responsibility for that determination.

ANSWER:

As discussed in section 3.2, provisions in the QA program provide for development of procedures for unique situations when deviations from the specified programmatic controls are appropriate. The Executive Vice President, Central Operations must approve such procedures.

In the specific case of AMSAC, no determination has yet been made that an aspect of the program "prove(s) overly restrictive". If such a determination is to be considered, then procedures for that unique situation will be developed in accordance with the above provisions and such procedures will identify the organizations responsible for that determination.

The note on page 5 of the Appendix will be revised to refer to procedural control provisions of section 3.2.

11. Change (or justify not changing) the first sentence of the penultimate paragraph on page 3 of Attachment II or the submittal to read essentially as follows: "We shall continue 100% QA Verification of these documents until data shows that the work processes produce complete and accurate procurement documents, modification packages, and work instructions."

ANSWER:

The subject sentence will be revised to read: "We shall continue 100% QA verification of these documents until qualitative and/or quantitative data show that the work processes produce proper and adequate procurement documents, modification packages and work instructions."

In the above sentence, in addition to the suggested change regarding data, the terms "complete and accurate" have been changed to "proper and adequate". This additional change was made to eliminate the potential extreme interpretation that "complete and accurate" means that all information including non-substantive information must in all cases be included and accurately identified in the document for them to be considered "complete and accurate".

12. Editorially:

- a. The first change on page 11 refers to a "two year frequency" for audits. Shouldn't this refer to a "two year (or more often) frequency"? Also, "at" needs to be inserted between conducted and least.
- b. Should the second "or" be "and" in the revision at the top of page 30?
- c. In the last item on page 6 of Attachment II, "an" should be "and". Also consider whether "Field Engineering" should be included in the item.

ANSWER:

- 12a. The "two year frequency" should correctly be referred to as the "... two year (or more often) frequency" and an "at" should be inserted between conducted and least.
- 12b. Yes.
- 12c. The word "an" should correctly be "and". Field Engineering is part of Central Engineering, commonly referred to as Engineering in the QAPD, and is therefore included in the discussion.

ATTACHMENT II

EXPLANATION OF CHANGES TO THE

QUALITY ASSURANCE PROGRAM DESCRIPTION

ATTACHMENT II

Following is a summary of additional changes to Revision 6 of the Quality Assurance Program Description and should be considered as information supplementing Revision 7 dated November 30, 1989.

- Page 5
middle
and
bottom

 - o Sentence revised to eliminate the organizational restriction that only QA certifies Con Edison nondestructive examination (NDE) personnel. Sentence added to clarify that certification of NDE personnel will be accomplished by QA or Nuclear Power, as applicable. This change was made to authorize certification of NDE personnel by Nuclear Power to more efficiently support that organization's functions related to ASME XI Inservice Testing and Inspection.

- Page 25
top

 - o Paragraph was revised to specify that Nuclear Power Test and Performance Engineer group will accomplish nondestructive examinations and maintain NDE records associated with ASME Section XI Inservice Inspections. This was previously specified as a QA responsibility. This change was made to centralize all functions related to ASME XI in one organization to permit more efficient use of personnel in performing closely related functions.

3.2 Assignment of Authority & Responsibility (cont'd)

and controlling all traffic of nuclear fuel and by-products prior to fabrication and in transfer to and from the nuclear plant.

The Quality Assurance organization is responsible for assuring that quality assurance programs are established consistent with this program and company policy and, assures that these programs are properly implemented. QA carries out these responsibilities primarily through program development, site surveillance and first-line inspection and by auditing those activities which affect plant safety. QA develops audit plans and schedules, and administers other activities associated with auditing. The Director, Quality Assurance reports to the Assistant Vice President, Power Generation Services, who reports directly to the Executive Vice President, Central Operations. This provides QA with the authority and organizational freedom to identify quality problems; to initiate, recommend or provide solutions through designated channels; and to verify implementation of solutions. The Quality Assurance organization ~~certifies Con Edison non-destructive examination personnel and~~ is responsible for indoctrination and training of QA personnel and for reviewing proposed changes to this program. QA reviews documents which implement this program to assure that each includes adequate quality assurance principles.

Each organization participating in this program is responsible for providing indoctrination and training of its personnel performing activities affecting quality and safety to ensure that suitable proficiency is achieved and maintained. QA or Nuclear Power, as applicable, certifies Con Edison non-destructive examination personnel. Quality assurance and quality control personnel are trained to have and maintain proficiency in skills related to their specific assignments and in their knowledge of this program. Quality assurance and quality control personnel are provided indoctrination and training in the areas of quality assurance management and quality assurance practices, procedures, and requirements, including applicable regulatory and code requirements. QA provides indoctrination and training concerning the requirements of this quality assurance program to QA personnel, and appropriate personnel in other organizations.

3.3 Indoctrination and Training

Indoctrination and training in the administrative controls and quality assurance program is conducted for Con Edison ...

5.2.8 Surveillance Testing and Inspection (cont'd)

6. Evaluating data for compliance with Plant Technical Specification requirements.

The NDE portion of the Inservice Inspection program is also the responsibility of the Test and Performance Engineer Nuclear Power Quality Assurance and is based on ASME Code Section XI, except that the NDE personnel will be qualified to SNT-TC-1A 1975 as per our commitment to RG 1.58, REV. 1, September 1980. As required, baseline data are gathered to permit a comparison of any changes occurring as a result of plant operations. The areas requiring inspections and the overall schedule are consistent with the requirements of the Plant Technical Specifications. ~~Nuclear Power Quality Assurance~~ Test and Performance maintains inservice testing records and NDE Inservice Inspection records.

5.2.9 Plant Security and Visitor Control

A comprehensive security and visitor control program has been established, including measures to thwart attempted sabotage. Procedures have been developed by Nuclear Power which supplement features and physical barriers designed to control access to the plant and, as appropriate, to vital areas within the plant.

Measures have been established by the Fire Protection, Safety and Security Manager to deter or discourage penetration by unauthorized persons, to detect such penetrations should they occur, to apprehend in a timely manner either unauthorized persons or authorized persons acting in a manner constituting a threat of sabotage, and to provide for appropriate authorities to take custody of violators. The means by which plant security and visitor control are enforced by both security and operating personnel include measures for physical and administrative control of access to the plant site or portions thereof, selecting and retaining reliable personnel and detecting aberrant behavior, monitoring the status of vital equipment and facilities, augmenting security in the event of actual or potential threats to plant security and designing features of the plant specifically for security purposes or features which, by their nature, reduce the vulnerability of the plant to sabotage attacks.