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New York Power Authority

William J. Cahill, Jr.
Chief Nuclear Officer

June 21, 1996
IPN-96-066

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

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Clarification of Commitments Associated
With the Quality Assurance Program

References:
1. NYPA letter, J. P. Bayne to NRC, "Quality Assurance Program Review," dated October 19, 1983 (IPN-83-87).
2. NYPA letter, J. P. Bayne to NRC, "Quality Assurance Program Description - 10 CFR 50.54(a)," dated June 10, 1983 (IPN-83-57).

Dear Sir:

This letter is being written to clarify and modify commitments which were made in Reference 1. Reference 1 responded to questions from the NRC on the NYPA Quality Assurance (QA) Program submitted for review by Reference 2, pursuant to 10 CFR 50.54(a). Several of the responses in Reference 1 clarified how the QA program requirements would be implemented and, as such, addressed topics at a level of detail below that of the program manual. Because of the evolution of the QA Program since 1983, several of the responses provided are inconsistent with the oversight philosophy the Authority is currently implementing, and require the conduct of activities which add little value. The clarifications suggested in this letter reflect the most effective use of the Authority's oversight resources.

Attachment I describes changes and clarifications to several responses contained in Reference 1. The attachment lists the NRC questions and NYPA responses, and provides clarification and/or changes to these responses. The revisions to the QA Program Manual to reflect these changes will be minor and will not change the intent of the Program. In conclusion, the change in the QA review process described in Attachment I will not reduce the commitments in the QA program.

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Attachment II contains a summary of the new commitments made in this submittal. If you have any questions, please contact C. D. Faison.

Very truly yours,

William J. Cahill, Jr.
Chief Nuclear Officer

cc: Regional Administrator
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Attachment I to IPN-96-066

Clarification of QA Program Commitments

New York Power Authority
Indian Point 3 Nuclear Power Plant
Docket No. 50-286

Clarification of QA Program Commitments

1. NRC Question 64

The response to Request 16 is not adequate. The matrix included in Request 16 indicates examples where the QA organization does not review or concur in all procedures and documents that affect safety and quality. It is the staff's position that qualified individuals in the QA organization, either onsite or offsite, shall be responsible for performing reviews of all documents affecting safety and quality, including changes thereto, and for indicating approval.

Authority Response dated 10/19/83

The following revised Matrix, reflecting the current Administrative/Departmental Procedures, is submitted in response to this question.

In all cases procedures are reviewed by the department requiring these procedures, by persons other than the preparer. They are approved by the Department and in the case of plant procedures by the Resident Manager after Plant Operating Review Committee (PORC) review.

Because of the technical nature of many of these documents, the Authority considers that they should be prepared and reviewed by technical personnel and that the current review cycle is sufficient to meet the requirements of Criteria V of 10 CFR 50, Appendix B.

Clarification to Authority Response

The above response requires several clarifications. The first clarification is needed because this response infers that the Plant Manager (PM) signs all plant procedures after review by PORC. Section 6.5 of the Technical Specifications provides the requirements for the review and approval of plant procedures. This section states that procedures are reviewed and approved by appropriate plant management and this approval process is controlled by administrative procedures. Therefore, PM approval is not required for all procedures.

In addition, clarification of the matrix provided in response to this question is needed. As the types and names of procedures, as well as the organizational names and responsibilities have changed since 1983, and will continue to change in the future, committing to a detailed matrix of document reviews and approvals is unnecessary and administratively cumbersome. Rather, the Authority will continue to implement the procedure review and approval requirements as specified in the Quality Assurance Manual, Final Safety Analysis Report and Technical Specifications.

The final clarification concerns the QA review and approval of documents and procedures. QA is part of the review and concurrence cycle for certain higher level procedures which set overall policy and direction, but does not review each department's individual procedures. Rather, QA verifies the compliance of these procedures to higher

level requirements through oversight functions such as audits, surveillances and assessments. Likewise, with other documents such as modifications, QA reviews and/or approves those documents which require QA input or have an impact on the Quality Assurance function, such as assignment of hold points in work documents, reviews for impact on QA programs and processes, and non-destructive examination (NDE) concerns. Verification of the technical and administrative adequacy of these documents is intended to be accomplished through oversight activities, and not through the 100% in-line reviews currently being practiced to remain in compliance with our previous response to Question 64. A 100% in-line review is not an effective use of QA resources, and may, over time, distract from the line organization's responsibilities to produce technically accurate documents in accordance with approved procedures. Currently, in addition to the QA review, document reviews are conducted by qualified individuals in the responsible department, with evidence of the review sufficiently documented. This change from 100% in-line review of documents by QA to verification by audits, surveillances, and assessments is appropriate at this time for the following reasons.

- The implementation of the IP3 Restart and Continuous Improvement Program (RCIP) and the JAF Restart Improvement Program (RIP) has resulted in improved training and on the job competence in the line organization. These improvements have fostered an improved questioning attitude.

- The QA Division's audit, assessment, and surveillance programs have continued to mature to the point where they provide a much better mechanism for evaluating line performance than 100% in-line reviews. Additional emphasis and manpower dedicated to these activities will have a more positive impact on the overall quality of the Authority program than a 100% in-line review of specific documents. Also, the QA Division may institute in-line reviews of documents when either oversight activities or the significance of the document indicates that it is appropriate. Whenever QA audits, surveillances, inspections or analyzed trends identify weaknesses that warrant increased oversight activities, increased in-line reviews could be considered as an appropriate, immediate corrective action.

- Historically, trends indicate that the greatest impact on document related issues has been realized from the periodic oversight activities conducted by the QA Division, and not through the in-line review process. Comments generated from in-line reviews have generally been minor in nature, resolved during the review process, and did not have an overall effect on the acceptability of the document.

- QA will continue to perform a combination of audits, assessments, surveillances and selected in-line reviews based on the nature and importance of the area under consideration and the types of problems encountered. Applicable procedures will provide the guidelines and options for performing in-line reviews.

- QA reviews an average of 30 to 40 engineering documents per month. Comments have been minor with the quality of the documents judged to be good.

- Engineering, through its Engineering Assurance Program, is instituting self assessment reviews of engineering documents. This self assessment activity further minimizes the need for 100% in-line QA reviews.

- QA is currently actively involved in the Engineering Assurance Program and has provided guidance and expertise in its development. QA provides regular assessment input into this program.

- QA, along with the Operations Review Group (ORG), prepares a quarterly trend/assessment report to document and analyze any problemmatic areas, including design control, and recommend solutions and corrective actions for the issues identified.

2. NRC Question 78

Clarify in response to Request 46 whether the review of drawings and specifications are performed by the QA organization and whether the results of this review are documented.

Authority Response dated 10/19/83

The Authority's response to item 77 describes the program requirements for the review of drawings and specifications which are performed in accordance with approved procedures that include QA personnel in the review cycle. These reviews are performed to assure that the documents contain the necessary quality requirement such as inspection and acceptance criteria and that the documents have been appropriately processed in accordance with Authority procedures.

To clarify the Authority's program requirements, we propose to revise the second paragraph of 17.2.3.3 of the QA Program, in accordance with the following text.

> "Design documents are reviewed by technical and quality personnel; to assure that design characteristics can be controlled, inspected and tested: and inspection and test criteria are identified. The review also assures that documents have been prepared reviewed and approved in accordance with approved procedures. Review results are appropriately documented."

Clarification to Authority Response

As stated in the above clarification to question 64, the Authority believes that the most effective manner to accomplish its oversight function is through its audit, assessment and surveillance programs, and not through a mandated 100% in-line review of all safety related documents. Those documents which require QA input, as well as those which impact the quality assurance function, will be reviewed by QA. Reasonable assurance of the technical and administrative accuracy of these documents will be verified through audits, assessments, and surveillances. The Authority intends to change the above paragraph to clarify that quality personnel do not review all design documents, and that the verification of document correctness is accomplished through the QA audit and surveillance programs.

Attachment II to IPN-96-066

Summary of Commitments

New York Power Authority
Indian Point 3 Nuclear Power Plant
Docket No. 50-286

Commitments for IPN-96-066

Commitment No.	Commitment	Due Date
IPN-96-066-01	Revise the QA Program Manual to reflect changes described in this letter	1/1/97
IPN-96-066-02	Revise QA procedures to provide the guidelines and options for performing in-line reviews.	8/1/96
IPN-96-066-03	Revise FSAR section 17.2.3.3 to clarify that quality personnel do not review all design documents, and that the verification of document correctness is accomplished through the QA audit and surveillance programs.	The next applicable FSAR update.

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