123 Main Street
White Plains, New York 10601
914 681.6840
914 287.3309 (FAX)

NewYorkPower Authority

James Knubel
Senior Vice President and
Chief Nuclear Officer

November 24, 1997
IPN-97-160
JPN-97-036

U.S. Nuclear Regulatory Commission
Attn. Document Control Desk
Washington D.C. 20555

Subject: Indian Point Unit 3 Nuclear Power Plant
Docket No. 50-286
James A. Fitzpatrick Nuclear Power Plant
Docket No. 50-333
Request for Approval to Change the Quality Assurance Program Description by Transferring the Organizational Responsibility for the Review of Procurement Documents and the Receipt Inspection Function

Dear Sir:

This letter is being submitted in accordance with 10 CFR 50.54(a) (3), which requires prior Nuclear Regulatory Commission (NRC) approval for changes to the Quality Assurance Program description that reduce the commitments contained therein. The Quality Assurance Program, as described in IP3 UFSAR Section 17.2 (12/95) and Fitzpatrick UFSAR Section 17.2 (5/97), commits New York Power Authority (NYPA) Quality Assurance personnel to perform procurement document reviews and receipt inspection activities by Quality Assurance receipt inspectors certified in accordance with ANSI N45.2.6 – 1978. The Authority is proposing that the procurement document review and receipt inspections be transferred to the line organization (Material Control Department at Fitzpatrick and the Procurement Inventory Department at IP3) at each plant, and that the NRC review and approve this change. The reduction in commitment does not reduce the Authority's commitment to quality, nor to compliance with 10 CFR 50 Appendix B.

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Receipt inspection performed either by the Authority's Quality Assurance or line organization personnel is organizationally independent of both the vendor producing the items inspected and of the user group. Thus we do not consider this to be a peer inspection initiative and Criterion VII, Control of Purchased Material, Equipment and Services and Criterion X, Inspection, of 10 CFR 50, Appendix B are still satisfied. The Authority also stresses individual independence by encouraging the use of the Deviation Event Report (DER) system to report deviations. Approximately eighty-five percent (85%) of the Deviation Event Reports at NYPA are initiated by the line organization.

The Authority has developed a transition program to ensure that the receipt inspection process applied to quality assured items will remain at or above the currently provided level of quality. The transition program will involve transferring currently ANSI N45.2.6-1978 certified receipt inspection personnel to the line organization. The ANSI N45.2.6 certification process for receipt inspectors will remain a Quality Assurance function.

The commitment requiring procurement document review has been in effect since the design and construction phases of Indian Point 3 and Fitzpatrick. Considerable Nuclear Quality Assurance resources continue to be expended in performing these reviews. We have determined that transferring this responsibility to the line organization will result in a more efficient and effective use of resources.

Current procedures require the Procurement Engineering Group at both plants to determine the technical requirements, quality assurance requirements and other requirements for each safety related procurement. Procedures for the preparation of procurement documents for safety-related material require a detailed, documented evaluation and verification of the requirements. A review of Deviation Event Reports (DERs) initiated by the Quality Assurance organization from 1994 to present has revealed that only 4 deficiencies at IP3 and three at Fitzpatrick have been identified associated with thousands of procurement document reviews performed by the line organization. At this point in time, successful implementation of these procedures and the knowledge and capabilities of the Procurement Engineering Group to establish appropriate technical and quality requirements has made the Quality Assurance review a redundant process.

ASSESSMENT

NYPA Quality Assurance will assess this transition period through routine, increased surveillance activity and will continue to include receipt inspections and procurement document review in the scope of quality audits. The surveillance activity will include the review of performance appropriate indicators and the number and severity of DERs initiated as a result of unacceptable receipt inspection and/or procurement document review. Both the audit and surveillance checklists will also contain attributes to be used for monitoring the performance of the line organizations. Based on this data, adjustments will be made, as required, to ensure the continued high quality of receipt inspections and procurement document review during and after the transition period.

The transfer of existing personnel in the Quality Assurance organization currently performing receipt inspection and procurement document review activities will ensure that the knowledge, experience and qualification of personnel performing these activities will not be diminished during the transition of responsibilities to the line organization.

OTHER COMMITMENTS

The following are additional IP3 regulatory commitments affected by this request:

- To address a weakness in the commercial grade dedication program related to the lack of positive material verification when it was identified as a critical characteristic, the Authority committed to implement QA reviews of all commercial grade dedication packages.

Quality Assurance will continue to perform surveillances and include this process in audit criteria to ensure adequate reviews are performed.

- To address inadequate detail in receipt inspection procedures, NYPA had issued 3 Quality Assurance instructions to provide additional details. These requirements have since been incorporated in to Quality Assurance procedures. Receipt inspection will continue to follow applicable QA guidelines specified.

The requirement in the receipt inspection instructions will be transferred to the line organization and the activity will be monitored by Quality Assurance surveillance and the audit process.

- In an October 19, 1983 letter to the NRC (IPN-83-087), the Authority described how it's QA program meets the intent of Regulatory Guide 1.123, Revision 1, "Quality Assurance Requirements for Control of Procurement Items and Services for Nuclear Power Plants," which endorsed ANSI standard N45.2.13. The following procedures assure that the intent of Regulatory Guide 1.123 is achieved: Quality Assurance Procedures (QAPs) 4.1, 7.1, 7.2, 7.3, 7.4, 7.7, 16.3 and 25.2; and Contract Administration Procedures 4.1, 4.3, 4.4, 4.5 and 7.1.

The Authority's QA program will continue to meet the commitment. The QAPs applicable to receipt inspection and procurement document review will be transferred to the line organization and issued as line organization procedures. Quality Assurance will monitor the implementation of the transferred procedures using the surveillance and audit procedures.

CONCLUSION

NYPA recognizes that the transfer of the receipt inspection and procurement document review functions from NYPA Quality Assurance to the line organization is a substantial change and chose this strategy after extensive research and planning. This proposed change in the Authority's QA Program is justified and will provide greater effectiveness in the receipt inspection and procurement document review functions because there will be:

- No reduction in quality.
- A more focused approach to material control activities.
- Ownership of material quality consolidated under one organization.

- Improved lines of communication within the new material control group
- Quality Assurance oversight of the transition process
- Continued surveillance and audit activities to monitor the program effectiveness.
- Efficiencies realized through the removal of redundant tasks and combining of existing activities.
- Continued independence for identifying problems and recommending solutions inherent in the Deviation Event Report (DER) process utilized by NYPA personnel.

This change in commitments is consistent with receipt inspection program and procurement document review changes approved by the NRC for PECO Energy at Peach Bottom Atomic Power Station, Units 2 and 3; Limerick Generating Station, Units 1 and 2; and Baltimore Gas and Electric at the Calvert Cliffs Nuclear Power Plant.

The proposed changes to the QA Program descriptions in the FitzPatrick UFSAR and IP3 UFSAR are provided in Attachments 1 and 2, respectively. Attachments 1 and 2 do not reflect changes to the QA Program not associated with the changes described in this letter. Those changes will be submitted to the NRC in accordance with the requirements of FSAR update rule, 10 CFR 50.71(e).

The elimination of receipt inspections and procurement document reviews by NYPA Quality Assurance personnel will not occur without NRC approval; therefore, we are requesting your prompt review and approval.

There are no commitments contained in this submittal. If you have any questions regarding this matter, please contact the Director - Nuclear Licensing, Ms. C. Faison.

Very truly yours,

Jim Knubel
Senior Vice President and
Chief Nuclear Officer

cc: Next page

cc: Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Office of the Resident Inspector
U. S. Nuclear Regulatory Commission
Indian Point 3
P. O. Box 337
Buchanan, NY 10511

Mr. George Wunder, Project Manager
Project Directorate I-1
Division of Reactor Projects-I/II
U. S. Nuclear Regulatory Commission
Mail Stop 14B2
Washington, DC 20555

Office of the Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 136
Lycoming, NY 13093

Ms. K. Cotton, Acting Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
Mail Stop 14 B2
Washington, DC 20555

Attachments:

1. Marked-up James A. FitzPatrick Updated Final Safety Analysis Report, Chapter 17, "Quality Assurance Program," pages 17.2-6, 17.2-9, 17.2-14, 17.2-18, and Fig. 17.2-5.

2. Marked-up Indian Point 3 Updated Final Safety Analysis Report, Chapter 17.2, "Quality Assurance Program – Operations," pages 17.2-5, 17.2-6, 17.2-13, 17.2-14, 17.2-17 and Figs. 17.2-2 and 17.2-5.

Attachment 1 to JPN-97-036/IPN-97-160

Marked-up James A. FitzPatrick Updated Final Safety Analysis Report, Chapter 17, "Quality Assurance Program," pages 17.2-6, 17.2-9, 17.2-14, 17.2-18, and Fig. 17.2-5.

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4) Establishing interface relationship and maintaining controls between Quality Assurance organizations of the Authority and major contractors.

5) Control of materials on a conditional release and establishing a system by which the Authority may initiate stop work action at the plant, when necessary, for safety-related structures, systems and components.

6) Requirements for examination and certification of the Authority's nondestructive examination (NDE) personnel.

7) Qualification requirements, duties and training of the Authority's Quality Assurance personnel as auditors.

8) Indoctrination and training of QA personnel as well as personnel from other departments assigned to perform quality related activities.

9) Assessing the Authority's Quality Assurance Program to assure its implementation and effectiveness.

~~10) Review of procurement documents and changes thereto, in order to assure that Quality Assurance provisions have been adequately incorporated for material, equipment and services that are safety-related or to an extent consistent with their importance to safety.~~

11) Preparation, processing and control of Quality Assurance Procedures and Program documents and revisions thereto.

12) Processing and control of QA documents either generated or received by the QA organization.

13) Participating in vendor selection and evaluation.

~~14) Receiving inspection.~~

15) Contractor/vendor surveillance inspection.

16) Inspection of plant quality related activities.

17) Monitoring the activities of external A-E/Consultant and consulting organizations.

18) Monitoring control of special processes (e.g., welding, cadwelding, heat treating, surface finishing).

19) Monitoring test control to assure that testing is being satisfactorily performed.

undertake when authorized by the Authority; this does not preclude the possibility that these delegated activities will be expanded or diminished in scope:

1) Design modification and reviews

~~2) Procurement document preparation~~

3) Vendor qualification

4) Vendor surveys and audits

5) Source inspection

6) Shipment release

7) Document Control

8) Nonconformance and corrective action

9) Control of special processes

10) Shipping

11) Installation

12) Fabrication and/or construction

13) Record Retention

17.2.2.2 QA Program Applicability

The Quality Assurance Program is applied to safety-related structures, systems and components.

Safely-related structures, systems and components are those necessary to ensure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safe shutdown condition, or the capability to prevent or mitigate the consequences of accidents that could result in offsite exposures comparable to the guideline exposures of Title 10, Code of Federal Regulations, Part 100, "Reactor Site Criteria".

17.2.2.3 Establishment and Management of the Authority's QA Program

The Authority's Quality Assurance Program has been established prior to the Authority assuming operation activities. The requirements are reviewed, as required, to improve implementation of the Quality Assurance Program as activities warrant.

17.2.2.4 Quality Assurance Program Documentation

The Quality Assurance Programs of the Authority and other delegated organizations establish written policies, procedures, and instructions, in compliance with Appendix B to 10 CFR 50, applicable codes and specifications, regulatory requirements, regulatory guides and standards.

the retention, control and maintenance of records, and the purchasing agents rights of access to the vendor's facilities and records for source inspection and audit.

Procurement documents for spare or replacement parts shall be subject to requirements at least equivalent to those used for the original procurement. The original procurement documents may be used as a basis for purchase of spare or replacement parts.

The specifications contain provisions for extending applicable requirements of the document to subcontractors and suppliers including purchaser's right of access to such subvendor's facilities and records.

17.2.4.2 Preparation, Review, Approval and Issue of Procurement Documents and Changes

The Authority's Quality Assurance Program requires that procedures be established that clearly delineate the sequence of actions to be taken in the preparation, review, approval, and control of procurement documents.

The Authority's Quality Assurance requirements for procurement document control requires that document review procedures be established. The reviews of procurement documents in accordance with these procedures are performed by knowledgeable ~~Quality Assurance~~ personnel who can determine if quality requirements are complete, correctly defined, and incorporated, so that the procured items can be properly inspected and controlled, and that acceptance criteria are adequately specified.

The review and approval of procurement documents are documented prior to release and are available for verification.

The Authority's purchase specifications, and changes thereto, are reviewed by the Authority"s Engineering, Procurement and Contract Administration/ Nuclear Generation/Plant Technical Services/Purchasing Coordinator, as applicable, ~~and Quality Assurance~~ in accordance with requirements contained in the Authority"s Quality Assurance Program. The Authority's Quality Assurance organization reviews purchase specifications and changes thereto, for quality requirements in accordance with the Quality Assurance Program. Purchase orders are processed following approval of the specification by the Authority's Engineering, Procurement and Contract Administration/Nuclear Generation/Plant Technical Services/Purchasing Coordinator, as applicable, ~~and Quality Assurance~~. Changes and/or revisions to procurement documents shall be subject to the same degree of control as utilized in the preparation of the original document.

17.2.4.3 Vendor QA Program Requirements

The Authority requires that delegated organizations have documented Quality Assurance Programs and that subcontractors have and implement documented Quality Assurance Programs for materials, equipment and services to an extent consistent with their importance to safety and scope of activities.

The operating organization will perform Procurement Document Control activities at the plant in accordance with approved written procedures which conform to the requirements of the Authority's Quality Assurance Program.

17.2.7.1 General Description

The Authority's Quality Assurance Program establishes controls to assure that purchased safety-related material, equipment and services, whether purchased directly or through contractors and subcontractors, conform to the procurement document requirements. These measures include, as appropriate, provisions for source evaluation and selection of equipment vendors, objective evidence of quality furnished by contractors or subcontractors, inspection and audit at the source, and examination of products upon delivery.

Vendor selection and evaluation is based on qualifying data, such as the seller's QA Program and past performance data of similar items and vendor surveys, to determine the adequacy of the facilities and the effectiveness of the QA Program. - INSERT A -

Objective evidence of quality furnished by the contractors or subcontractors shall identify the purchased material (e.g., codes, standards, specifications met by the materials or equipment). The contractors or subcontractors are also required to identify any procurement requirements which have not been met together with a description of those nonconformances dispositioned "accept as is" or "repair" as part of this objective evidence of quality.

Source inspection shall be required when the conformance of materials, parts and components to procurement documents cannot be verified upon receipt or the service contracted is of a nature requiring a witnessing or verification function.

Receipt inspection includes verification that the required documentation has been received and that the items conform to the procurement documents. Receipt inspection shall be performed in accordance with written procedures and instructions, and receiving activities shall be documented to assure that the: material, component, or equipment is properly identified, including the receiving documentation; acceptance records are inspected with predetermined inspection instructions; inspection records or certificates of conformance or compliance are available at the plant; items accepted and released are identified as to their inspection status.

The operating organization will perform activities related to RECEIPT INSPECTION AND control of purchased material, equipment and services at the plant, in accordance with approved written procedures which conform to the requirements of the Authority's Operation Quality Assurance Program.

17.2.7.2 Major Supplier Evaluations

The Authority's Quality Assurance Program provides for the evaluation of Quality Assurance Programs of major suppliers and delegated organizations. These evaluations assure that they are capable of providing equipment, material and services which meet the applicable regulatory guides, codes, industry standards and regulatory requirements. Audits will be performed to verify that the major suppliers and delegated organizations are satisfactorily implementing approved QA Program requirements.

Marked-up James A. FitzPatrick Updated Final Safety Analysis Report, Chapter 17, "Quality Assurance Program," page 17.2-18

INSERT A

In lieu of annual evaluations, ongoing evaluations will use receipt inspection data, industry information and audit survey reports to assess vendor performance.

10CFR50, APPENDIX B QUALITY ASSURANCE CRITERIA	ORGANIZATION	QUALITY ASSURANCE PROGRAM	DESIGN CONTROL	PROCUREMENT DOCUMENT CONTROL	INSTRUCTIONS, PROCEDURES & DRAWINGS	DOCUMENT CONTROL	CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES	IDENTIFICATION & CONTROL OF MATERIALS, PARTS & COMPONENTS	CONTROLS OF SPECIAL PROCESSES	INSPECTION	TEST CONTROL	CONTROL OF MEASURING AND TEST EQUIPMENT	HANDLING, STORAGE AND SHIPPING	INSPECTION, TEST & OPERATING STATUS	NONCONFORMING MATERIALS, PARTS AND COMPONENTS	CORRECTIVE ACTION	QUALITY ASSURANCE RECORDS	AUDITS
AUTHORITY QUALITY ASSURANCE PROGRAM MANUAL	17.2.1	17.2.2	17.2.3	17.2.4	17.2.5	17.2.6	17.2.7	17.2.8	17.2.9	17.2.10	17.2.11	17.2.12	17.2.13	17.2.14	17.2.15	17.2.16	17.2.17	17.2.18
HEADQUARTERS QUALITY ASSURANCE PROCEDURE MANUAL	1.1 2.6(W)	2.1 2.2 2.3 2.4 2.6(W)	3.1	4.1	5.1(W)	5.1(W)	7.1W 7.7 7.9 7.13	10.1	10.1	10.1	10.1	10.1	10.1	10.1	10.1	16.1 16.3	17.1	18.1 18.3 18.5
JAF QUALITY ASSURANCE PROCEDURE MANUAL	1.1-J 1.8-J	2.1-J 2.3-J 2.4-J 2.6-J	3.1-J	4.2-J	5.1-J 5.3-J	5.1-J	7.1-J 7.3-J 7.4-J 7.7-J 7.9-J 7.10-J 7.11-J 7.13-J	10.1-J	9.1-J 9.2-J 9.3-J	10.1-J 10.2-J 10.3-J	11.2-J	12.2-J 12.3-J 12.4-J 12.5-J	13.2-J	14.2-J	15.2-J	16.1-J 16.3-J	17.2-J	18.1-J 18.2-J 18.3-J 18.4-J 18.5-J

QAP NO. JAF QUALITY ASSURANCE PROCEDURE MANUAL

1.1-J QUALITY ASSURANCE ORGANIZATION
1.8-J CONDITIONAL RELEASE & STOP WORK - JAF PLANT
2.1-J QUALITY ASSURANCE PROGRAM SCOPE (GENERIC)
2.3-J INDOCTRINATION OF QA DEPARTMENT PERSONNEL
2.4-J SELF ASSESSMENT OF QA ACTIVITIES
2.6-J QA PERSONNEL TRAINING AND CERTIFICATION
3.1-J DESIGN CONTROL
~~4.2-J REVIEW OF JAF PROCUREMENT DOCUMENTS~~
5.1-J PREPARATION & PROCESSING OF QUALITY ASSURANCE PROCEDURES (GENERIC)
5.3-J CENTRAL PLANNING REQUEST PROCESSING
~~7.1-J EVALUATION OF PROCUREMENT SOURCES~~
~~7.3-J RECEIVING INSPECTION (INCLUDING APPENDICES)~~
~~7.4-J SAMPLE PLAN INSPECTION & VENDOR VERIFICATION TESTING~~
7.7-J CONTRACTOR/VENDOR SURVEILLANCE INSPECTIONS
~~7.9-J PROCUREMENT QUALITY ASSURANCE PLANNING~~
~~7.10-J QUALITY ASSURANCE REQUIREMENTS FOR COMMERCIAL GRADE ITEM DEDICATION~~
~~7.11-J USE OF MATERIAL VERIFICATION TEST EQUIPMENT~~
7.13-J PERFORMING, REPORTING & FOLLOWUP OF PROCUREMENT QUALITY AUDITS
9.1-J CONTROL OF SPECIAL PROCESSES
9.2-J QUALITY ASSURANCE SUPPORT OF SECTION XI ACTIVITIES
9.3-J ADMINISTRATIVE CONTROLS FOR NDE PROCEDURES
10.1-J INSPECTION OF QUALITY RELATED ACTIVITIES
10.2-J ESTABLISHMENT OF QUALITY ASSURANCE INSPECTION POINTS
10.3-J PROCESS MONITORING
11.2-J TEST CONTROL
12.2-J CONTROL AND CALIBRATION OF MEASURING AND TEST EQUIPMENT (M & T)
12.3-J CALIBRATION VERIFICATIION OF SPECTRO ANALYZER
12.4-J INDIRECT VERIFICATION OF NEW AGE DIGITAL ROCKWELL HARDNESS TESTORS
12.5-J VERIFICATION OF ACCURACY OF NEW AGE EXACTA DIGITAL DUROMETER
13.2-J HANDLING, STORAGE AND SHIPPING
14.2-J INSPECTION, TEST AND OPERATING STATUS (TAGGING)
15.2-J NON-CONFORMING MATERIAL, PARTS AND COMPONENTS
16.1-J CORRECTIVE ACTION
16.3-J TREND ANALYSIS PROGRAM
17.2-J MAINTENANCE, RETRIEVAL, AND RETENTION OF QA DEPARTMENT RECORDS
18.1-J QUALITY ASSURANCE AUDIT PROGRAM
18.2-J QUALITY SURVEILLANCE PROGRAM
18.3-J QUALITY ASSURANCE ASSESSMENTS
18.4-J AUDIT PROGRAM IMPLEMENTATION
18.5-J QA INTEGRATED VERIFICATION PROGRAM

QAP NO. HEADQUARTERS QA PROCEDURE TITLE

1.1 QUALITY ASSURANCE ORGANIZATION
2.1 QUALITY ASSURANCE PROGRAM SCOPE
2.2 QA PROGRAM STATUS REPORTING TO MANAGEMENT
2.3 INDOCTRINATION OF QA PERSONNEL
2.4 SELF ASSESSMENT OF QA ACTIVITIES
2.6(W) QUALITY ASSURANCE PERSONNEL TRAINING & CERTIFICATION
3.1 DESIGN CONTROL
4.1 PROCUREMENT DOCUMENT REVIEW
5.1(W) PREPARATION & PROCESSING OF QUALITY ASSURANCE PROCEDURES
7.1(W) EVALUATION OF PROCUREMENT SOURCES
7.7 CONTRACTOR/VENDOR SURVEILLANCE INSPECTION
7.9 PROCUREMENT QUALITY ASSURANCE PLANNING
7.13 PERFORMING, REPORTING AND FOLLOW-UP OF PROCUREMENT QUALITY AUDITS
10.1 INSPECTION OF QUALITY RELATED ACTIVITIES
16.1 CORRECTIVE ACTION
16.3 TREND ANALYSIS PROGRAM
17.1 QUALITY ASSURANCE RECORDS
18.1 QUALITY ASSURANCE AUDIT PROGRAM
18.3 QUALITY ASSURANCE ASSESSMENTS
18.5 QUALITY ASSURANCE INTEGRATED VERIFICATION PROGRAM

JAMES A. FITZPATRICK FSAR UPDATE

CROSS REFERENCE MATRIX OF IMPLEMENTING DOCUMENTS

REV. 7 | MAY, 1997 | FIGURE NO. 17.2-5

Attachment 2 to JPN-97-036/IPN-97-160

Marked-up Indian Point 3 Updated Final Safety Analysis Report, Chapter 17.2, "Quality Assurance Program – Operations," pages 17.2-5, 17.2-6, 17.2-13, 17.2-14, 17.2-17 and Figs. 17.2-2 and 17.2-5.

New York Power Authority

The Authority departments involved in the implementation of quality related activities are required to perform such activities in accordance with written approved procedures which are in conformance with the Authority's Quality Assurance Program.

Activities performed by the QA organization are to ensure that quality requirements have been included/accomplished, as appropriate, in all quality related activities. These activities include, but are not limited to:

1) Establishing and maintaining a Quality Assurance Program including objectives and scope.

2) Establishing and maintaining a Quality Assurance organization with clearly defined duties, responsibilities, authority, reporting level and relationship to other internal organizations that have been delegated QA activities.

3) Reporting to Authority management the status and adequacy of the QA Program.

4) Establishing interface relationship and maintaining controls between Quality Assurance organizations of the Authority and major contractors.

5) Control of materials on a conditional release and establishing a system by which the Authority may initiate stop work action at the plant, when necessary, for safety-related structures, systems and components.

6) Requirements for examination and certification of the Authority's nondestructive examination (NDE) personnel.

7) Qualification requirements, duties and training of the Authority's Quality Assurance personnel as auditors.

8) Indoctrination and training of QA personnel as well as personnel from other departments assigned to perform quality related activities.

9) Assessing the Authority's Quality Assurance Program to assure its implementation and effectiveness.

~~10) Review of procurement documents and changes thereto, in order to assure that Quality Assurance provisions have been adequately incorporated for material, equipment and services that are safety-related or to an extent consistent with their importance to safety.~~

11) Preparation, processing and control of Quality Assurance Procedures and Program documents and revisions thereto.

12) Processing and control of QA documents either generated or received by the QA organization.

13) Participating in vendor selection and evaluation.

~~14) Receiving inspection.~~

15) Contractor/vendor surveillance inspection.

16) Inspection of plant quality related activites.

17) Monitoring the activities of external A-E/Consultant and consulting organizations.

18) Monitoring control of special processes (e.g., welding, cadwelding, heat treating, and surface finishing).

19) Monitoring test control to assure that testing is being satisfactorily performed.

20) Monitoring control of nonconforming material parts or components.

21) Corrective action control at the plant and the Authority's headquarters for nonconformances identified by the Authority QA staff.

22) Establishing and maintaining a record retention system for QA documents generated by the Authority QA personnel.

23) Establishing and maintaining an audit program at the plant.

24) Establishing Quality Assurance requirements and providing for onsite Authority audits and QA program reviews of contractors performing work at the plant.

25) Measures necessary to perform audits of major contractors delegated QA activities being performed "offsite".

26) Internal audits at the Authority's Headquarters of quality related activities that are performed by Authority personnel at Headquarters.

17.2.2 Quality Assurance Program

17.2.2.1 General Description

The Authority's Quality Assurance policy is to control those activities needed to provide assurance that quality objectives are satisfied during the operation phase of the nuclear power plant. To acheive this end, the Authority has established a Quality Assurance Program. This program has been developed to comply with the NRC requirements delineated in Appendix B to 10 CFR 50, and Standard Review Plan NUREG-75/087, and is organized in 18 sections which correspond to the management principles outlined therein.

The Authority's Quality Assurance Program requires that purchase specifications contain or reference, as applicable: design information and technical requirements including component and material identification requirements including drawings, specifications, codes and industrial standards, regulatory guides and regulatory requirements; tests and inspection requirements; and special process instructions for such activities as fabrication, cleaning, erecting, packaging, handling, shipping, storing, and inspecting. The specification contains, as appropriate, requirements which identify the documents to be prepared, maintained, submitted, and made available to the purchasing agent for review and/or approval. These documents include drawings, specifications, procedures, inspection and test records, inspection and fabrication plans, personnel and procedure qualifications, materials, chemical and physical test results. The specifications contain applicable requirements for the retention, control and maintenance of records, and the purchasing agents rights of access to the vendor's facilities and records for source inspection and audit.

Procurement documents for spare or replacement parts shall be subject to requirements at least equivalent to those used for the original procurement. The original procurement documents may be used as a basis for purchase of spare or replacement parts.

The specifications contain provisions for extending applicable requirements of the document to subcontractors and suppliers including purchaser's right of access to such subvendor's facilities and records.

17.2.4.2 Preparation, Review, Approval and Issue of Procurement Documents and Changes

The Authority's Quality Assurance Program requires that procedures be established that clearly delineate the sequence of actions to be taken in the preparation, review, approval, and control of procurement documents.

The Authority's Quality Assurance requirements for procurement document control requires that document review procedures be established. The reviews of procurement documents in accordance with these procedures are performed by knowledgeable Quality Assurance personnel who can determine if quality requirements are complete, correctly defined and incorporated, that the procured items can be properly inspected and controlled, and that acceptance criteria are adequately specified.

The review and approval of procurement documents are documented prior to release and are available for verification.

The Authority's purchase specifications, and changes thereto, are reviewed by the Authority's Engineering, Procurement and Contract Administration/ Nuclear Generation/Plant Technical Services/Purchasing Coordinator, as applicable, ~~and Quality Assurance~~ in accordance with requirements contained in the Authority's Quality Assurance Program. The Authority's ~~Quality Assurance organization~~ PROCUREMENT INVENTORY DEPARTMENT reviews purchase specifications and changes thereto, for quality requirements in accordance with the Quality Assurance Program. Purchase orders are processed following approval of the specification by the Authority's Engineering, ~~Procurement and Contract Administration~~/Nuclear Generation/Plant Technical Services/Purchasing

Coordinator, as applicable, ~~and Quality Assurance.~~ Changes and/or revisions to procurement documents shall be subject to the same degree of control as utilized in the preparation of the original document.

17.2.4.3 Vendor QA Program Requirements

The Authority requires that delegated organizations have documented Quality Assurance Programs and that subcontractors have and implement documented Quality Assurance Programs for materials, equipment and services to an extent consistent with their importance to safety and scope of activities.

The operating organization will perform Procurement Document Control activities at the plant in accordance with approved written procedures which conform to the requirements of the Authority's Quality Assurance Program.

17.2.4.4 Authority Controls

The Authority reviews, comments and concurs with preliminary procurement documents, final bid documents and any changes thereto, to assure that the applicable requirements of Appendix B to 10 CFR 50 are included.

The Authority will review recommendations for contract award and will assure that any exceptions to the contract will not affect quality requirements.

The Authority will perform planned and periodic audits of delegated organizations to verify program implementation in accordance with approved QA Program requirements.

17.2.5 Instructions, Procedures and Drawings

17.2.5.1 General Description

The Authority's Quality Assurance Program requires that documents such as instructions, procedures and/or drawings which prescribe quality affecting activities be controlled and that quality affecting activities be performed in accordance with these instructions, procedures and/or drawings, as applicable.

The operating organization will control instructions, procedures and drawings at the plant in accordance with approved written procedures which conform to the requirements in the Authority's Quality Assurance Program. Quality affecting activities performed by the operating organization shall be accomplished in accordance with these instructions, procedures and/or drawings, as applicable.

The Authority and/or delegated organizations shall have established measures for the control and implementation of instructions, procedures, and drawings for quality related activities applicable to the scope of their responsibilities. The described measures by a designated A-E/Consultant, if applicable, are delineated in the document referenced in Section 17.2.2, Paragraph 17.2.2.1.

The Authority will perform planned and periodic audits of delegated organizations to verify program implementation in accordance with approved QA Program requirements.

17.2.7 Control of Purchased Material, Equipment and Services

17.2.7.1 General Description

The Authority's Quality Assurance Program establishes controls to assure that purchased safety-related material, equipment and services, whether purchased directly or through contractors and subcontractors, conform to the procurement document requirements. These measures include, as appropriate, provisions for source evaluation and selection of equipment vendors, objective evidence of quality furnished by contractors or subcontractors, inspection and audit at the source, and examination of products upon delivery.

Vendor selection and evaluation is based on qualifying data, such as the seller's QA Program and past performance data of similar items and vendor surveys, to determine the adequacy of the facilities and the effectiveness of the QA Program. -INSERT B-

Objective evidence of quality furnished by the contractors or subcontractors shall identify the purchased material (e.g., codes, standards, specifications met by the materials or equipment). The contractors or subcontractors are also required to identify any procurement requirements which have not been met together with a description of those noncomformances dispositioned "accept as is" or "repair" as part of this objective evidence of quality.

Source inspection shall be required when the conformance of materials, parts and components to procurement documents cannot be verified upon receipt or the service contracted is of a nature requiring a witnessing or verification function.

Receipt inspection includes verification that the required documentation has been received and that the items conform to the procurement documents. Receipt inspection shall be performed in accordance with written procedures and instructions, and receiving activities shall be documented to assure that the material, component, or equipment is properly identified, including the receiving documentation; acceptance records are inspected with predetermined inspection instructions; inspection records or certificates of conformance or compliance are available at the plant; items accepted and released are identified as to their inspection status.

The operating organization will perform activities related to RECEIPT INSPECTION AND control of purchased material, equipment and services at the plant, in accordance with approved written procedures which conform to the requirements of the Authority's Quality Assurance Program.

17.2.7.2 Major Supplier Evaluations

The Authority's Quality Assurance Program provides for the evaluation of Quality Assurance Programs of major suppliers and delegated organizations. These evaluations assure that they are capable of providing equipment,

Marked-up Indian Point 3 Updated Final Safety Analysis Report, Chapter 17.2, "Quality Assurance Program – Operations," page 17.2-17

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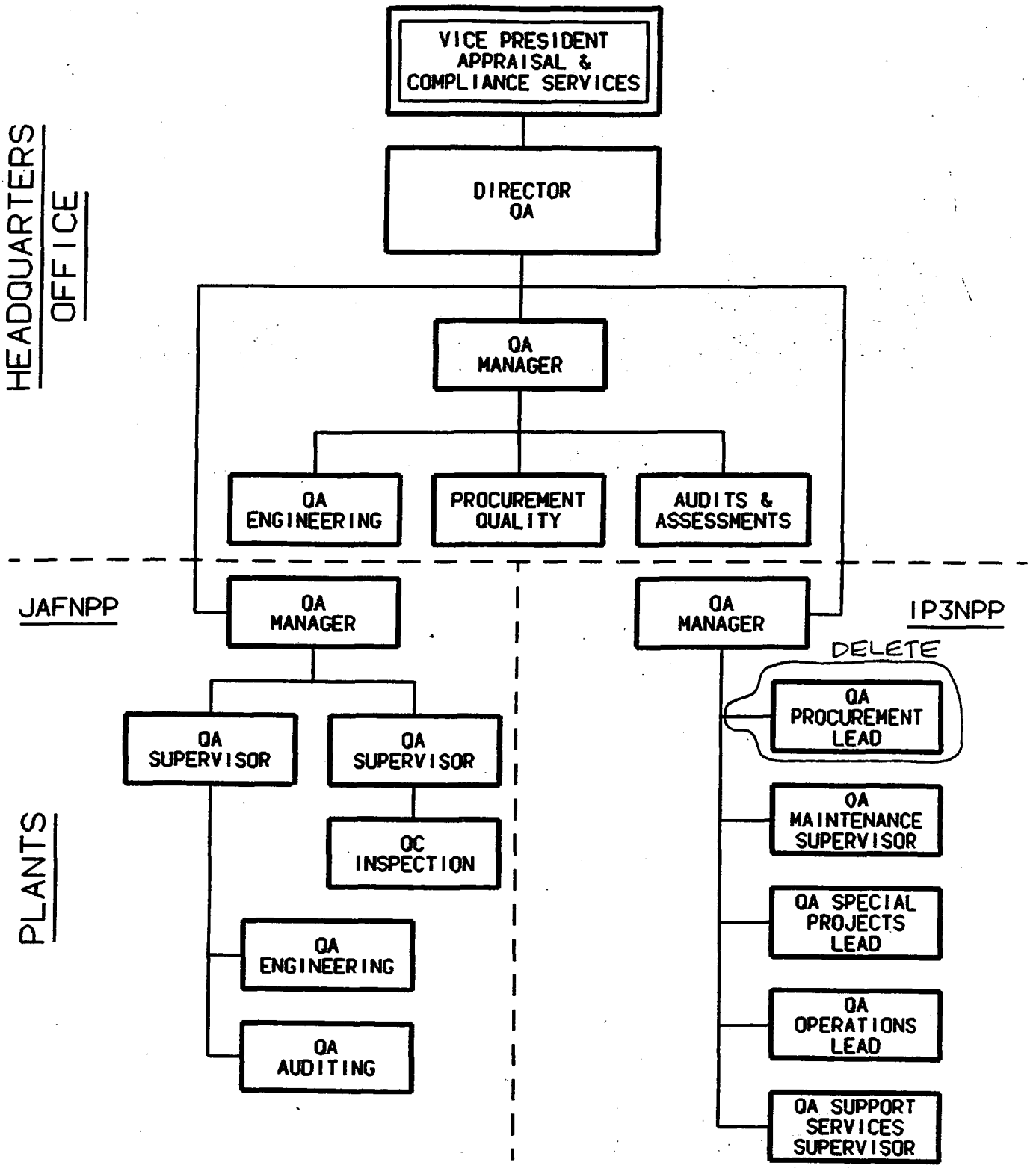
In lieu of annual evaluations, ongoing evaluations will use receipt inspection data, industry information and audit survey reports to assess vendor performance.



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AUTHORITY QA ORGANIZATION	
REV. 9 DEC. 1995	FIG. 17.2-2

10CFR50, APPENDIX B QA CRITERIA	ORGANIZATION	QUALITY ASSURANCE PROGRAM	DESIGN CONTROL	PROCUREMENT DOCUMENT CONTROL	INSTRUCTIONS, PROCEDURES & DRAWINGS	DOCUMENT CONTROL	CONTROL OF PURCHASED MATERIAL EQUIPMENT & SERVICES	IDENTIFICATION AND CONTROL OF MATERIALS, PARTS & COMPONENTS	CONTROLS OF SPECIAL PROCESSES	INSPECTION	TEST CONTROL	CONTROL OF MEASURING AND TEST EQUIPMENT	HANDLING, STORAGE & SHIPPING	INSPECTION, TEST & OPERATING STATUS	NONCONFORMING MATERIALS, PARTS, & COMPONENTS	CORRECTIVE ACTION	QA RECORDS	AUDITS
AUTHORITY QA PROGRAM MANUAL	17.2.1	17.2.2	17.2.3	17.2.4	17.2.5	17.2.6	17.2.7	17.2.8	17.2.9	17.2.10	17.2.11	17.2.12	17.2.13	17.2.14	17.2.15	17.2.16	17.2.17	17.2.18
HEAD-QUARTERS QA PROCEDURE MANUAL	1.1 1.8	2.1 2.2 2.3 2.4 2.6	3.1	4.1	5.1 5.2	6.1	7.1 7.7 7.9 7.13	8.1	9.1	10.1 10.2	11.1	12.1	13.1	14.1	15.2	16.1 16.3	17.1	18.1 18.3 18.5
IP3 QA PROCEDURE MANUAL	1.1 1.3	2.1 2.3 2.6	3.1	4.1	5.1	6.1 6.2	7.1 7.3 7.7 7.9	8.1	9.1	10.1	11.1	12.1	13.1	14.1	15.2 15.3 15.4	16.1	17.1	18.1 18.2 18.3 18.4

QAP No.	IP3 QUALITY ASSURANCE PROCEDURE MANUAL
1.1	QUALITY ASSURANCE ORGANIZATION (GENERIC)
1.3-I	CONDITIONAL RELEASE AND STOP WORK - PLANT
2.1	QUALITY ASSURANCE PROGRAM SCOPE
2.3	INDOCTRINATION OF QA PERSONNEL
2.6	QUALITY ASSURANCE PERSONNEL TRAINING AND CERTIFICATION
3.1	DESIGN CONTROL
~~4.1-I~~	~~PROCUREMENT DOCUMENT REVIEW~~
5.1-I	PREPARATION AND PROCESSING OF QA DOCUMENTS AND PROCEDURES
6.1	CONTROL OF QUALITY ASSURANCE MANUALS (GENERIC)
6.2	CONTROL OF QUALITY ASSURANCE CORRESPONDENCE (GENERIC)
~~7.1-I~~	~~EVALUATION OF PROCUREMENT SOURCES~~
~~7.8-I~~	~~RECEIVING INSPECTION~~
7.7-I	CONTRACTOR/VENDOR SURVEILLANCE INSPECTION
~~7.9-I~~	~~PROCUREMENT QA PLANNING~~
8.1-I	IDENTIFICATION AND CONTROL OF MATERIALS, PARTS & COMPONENTS (GENERIC)
9.1	CONTROL OF SPECIAL PROCESSES (GENERIC)
10.1-I	INSPECTION, SURVEILLANCE AND MONITORING OF QUALITY RELATED ACTIVITIES
11.1	TEST CONTROL (GENERIC)
12.1	CONTROL OF MEASURING AND TEST EQUIPMENT (GENERIC)
13.1	HANDLING, SHIPPING AND STORAGE (GENERIC)
14.1	INSPECTION, TEST AND OPERATING STATUS (GENERIC)
15.2	CONTROL OF NONCONFORMING MATERIAL, PARTS AND COMPONENTS
15.3-I	NONCONFORMANCE REPORT TRACKING
15.4-I	INSTALLATION AND REMOVAL OF QA NONCONFORMANCE REPORT (NCR) AND PROCUREMENT NONCONFORMANCE REPORT (PNR) HOLD TAGS
16.1	CORRECTIVE ACTION
16.4	CORRECTIVE ACTION TRACKING
17.1-I	QUALITY ASSURANCE DEPARTMENT RECORDS
18.1-I	QUALITY ASSURANCE AUDIT PROGRAM
18.2-I	SURVEILLANCE PROGRAM
18.3-I	QUALITY ASSURANCE ASSESSMENTS
18.4-I	TECHNICAL SPECIFICATION REQUIRED AUDITS

QAP No.	HEADQUARTERS QA PROCEDURE MANUAL
1.1	QUALITY ASSURANCE ORGANIZATION
1.8	GENERAL QUALIFICATION REQUIREMENTS FOR QUALITY FUNCTIONS AND FOR LEADERSHIP/MANAGEMENT FUNCTIONS
2.1	QUALITY ASSURANCE PROGRAM SCOPE
2.2	QA PROGRAM STATUS REPORTING TO MANAGEMENT
2.3	INDOCTRINATION OF QA PERSONNEL
2.4	SELF-ASSESMENT OF QA ACTIVITIES
2.6	QUALITY ASSURANCE PERSONNEL TRAINING & CERTIFICATION
3.1	DESIGN CONTROL
4.1	PROCUREMENT DOCUMENT REVIEW
5.1	PREPARATION AND PROCESSING OF QA PROCEDURES
5.2	PREPARATION AND PROCESSING OF QA PROGRAM
6.1	CONTROL OF QA MANUALS
7.1	EVALUATION OF PROCUREMENT SOURCES
7.7	CONTRACTOR/VENDOR SURVEILLANCE INSPECTION
7.9	PROCUREMENT QA PLANNING
7.13	PERFORMING, REPORTING AND FOLLOW-UP OF PROCUREMENT QUALITY AUDITS
8.1	IDENTIFICATION AND CONTROL OF MATERIALS, PARTS & COMPONENTS
9.1	CONTROL OF SPECIAL PROCESSES
10.1	INSPECTION OF QUALITY RELATED ACTIVITIES
10.2	QUALITY PLANT AREA TOUR PROGRAM
11.1	TEST CONTROL
12.1	CONTROL OF MEASURING AND TEST EQUIPMENT
13.1	HANDLING, SHIPPING AND STORAGE
14.1	INSPECTION, TEST AND OPERATING STATUS
15.2	CONTROL OF NONCONFORMING MATERIALS, PARTS AND COMPONENTS
16.1	CORRECTIVE ACTION
16.3	TREND ANALYSIS PROGRAM
17.1	QUALITY ASSURANCE RECORDS
18.1	QUALITY ASSURANCE AUDIT PROGRAM
18.3	QUALITY ASSURANCE ASSESSMENTS
18.5	QUALITY ASSURANCE INTEGRATED VERIFICATION PROGRAM

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CROSS REFERENCE MATRIX OF IMPLEMENTING DOCUMENTS	
REV. 6 DEC 1995	FIGURE No. 17.2-5