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**James Knubel**  
Senior Vice President and  
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June 16, 1998  
IPN-98-070  
JPN-98-027

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
**Response to Request for Additional Information  
Concerning a Change to the  
Quality Assurance Program Description By Transferring the  
Organizational Responsibility for the Review of  
Procurement Documents and Receipt Inspection Function**

- References:
1. NYPA letter (IPN-97-160 / JPN-97-036), "Request for Approval to Change the Quality Assurance Program Description by Transferring the Organizational Responsibility for the Review of Procurement Documents and Receipt Inspection Function" dated November 24, 1997.
  2. NRC letter, G. Wunder to J. Knubel, "Request for Additional Information - James A. FitzPatrick and Indian Point Nuclear Generating Unit No. 3 (TAC MA0219, MA1134, MA0231, and MA0629)," dated May 7, 1998.

Dear Sir:

Changes to the Indian Point 3 and James A. FitzPatrick Nuclear Power Plant Quality Assurance (QA) Programs regarding the review of procurement documents and receipt inspections were submitted to the NRC for approval in Reference 1. The NRC staff recently requested additional information regarding these changes (Reference 2). In particular, the staff requested additional information regarding the qualification of personnel performing receipt inspections during and after the transition program (Question 1). The Authority's response to Question 1 is below. Question 2 will be responded to separately.

#### **Qualifications of Receipt Inspection Personnel**

Personnel performing receipt inspections required by the Authority's QA Program will be ANSI

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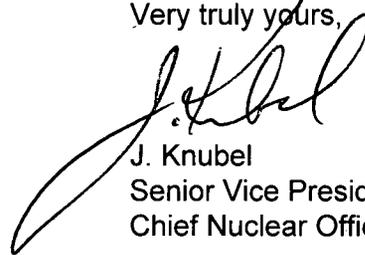
N45.2.6-1978 certified during and after the transfer of inspection personnel to the line organization. UFSAR (Updated Final Safety Analysis Report) Section 17.2.10 already requires that inspections be performed by personnel qualified to appropriate criteria, codes, standards and that the inspector be appropriately trained. (Note that Chapter 17 of the Indian Point 3 and FitzPatrick UFSARs both contain the QA program, and have the same format and content. As a result, references to Chapter 17 apply to both plants.) Section 17.2.7 of the UFSARs will be revised to clearly state that receipt inspectors will be ANSI N45.2.6-1978 certified.

Additional UFSAR revisions have been included to clarify the QA Program changes proposed by the Authority. Changes to Section 17.2.4 permit line organization personnel to review procurement documents for QA Program requirements. These changes do not alter the Authority's conclusion that the reduction in commitment does not reduce the Authority's commitment to quality, nor to compliance with 10 CFR 50 Appendix B.

Attachments 1 and 2 contain the revised QA Program description (Chapter 17 of the UFSAR) for the Indian Point 3 and James A. FitzPatrick plants, respectively. These supersede and replace the UFSAR pages submitted with Reference 1. Commitments made by the Authority in this submittal are summarized in Attachment 3.

If you have any questions concerning this matter, please contact Ms. C. D. Faison.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. Knubel', is written over the typed name and title.

J. Knubel  
Senior Vice President and  
Chief Nuclear Officer

Attachments:

1. Response to Request for Additional Information Concerning a Change to the Quality Assurance Program Description Regarding Supplier Evaluations, UFSAR Revisions for Indian Point 3 Nuclear Power Plant. Includes pages 17.2-13 and 17.2-17.
2. Response to Request for Additional Information Concerning a Change to the Quality Assurance Program Description Regarding Supplier Evaluations, UFSAR Revisions for James A. FitzPatrick Nuclear Power Plant: Includes pages 17.2-14 and 17.2-18.
3. Summary of Commitments

cc: Next page

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Attachment 1 to IPN-98-070/ JPN-98-027

**Response to Request for Additional Information  
Concerning a Change to the  
Quality Assurance Program Description By Transferring the  
Organizational Responsibility for the Review of  
Procurement Documents and Receipt Inspection Function**

**UFSAR Revisions for Indian Point 3 Nuclear Power Plant**  
(Additions shown in bold.)

New York Power Authority  
Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
DPR-64

IP3  
FSAR UPDATE

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 agent's 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 **or line organization** 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** review 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

IP3  
FSAR UPDATE

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

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. ***Personnel performing receipt inspection required by the QA Program will be certified in accordance with the requirements of ANSI N45.2.6-1978.***

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,

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(Additions shown in **bold**.)

JAF  
FSAR UPDATE

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 ~~or procurement~~ organizations review 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.

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

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. ***Personnel performing receipt inspection required by the QA Program will be certified in accordance with the requirements of ANSI N45.2.6-1978.***

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.

**Summary of Commitments - Indian Point 3**

Commitment Number	Commitment	Due Date
IPN-98-070-001	Personnel performing receipt inspections required by the Authority's QA Program will be ANSI N45.2.6-1978 certified during and after the transfer of inspection personnel to the line organization.	Within 30 days of NRC approval of this request
IPN-98-070-002	Revise the UFSAR to clearly state that receipt inspectors will be ANSI N45.2.6-1978 certified.	Next UFSAR update issued 6 or more months after NRC approval.

**Summary of Commitments - James A. FitzPatrick**

Commitment Number	Commitment	Due Date
JPN-98-027-001	Personnel performing receipt inspections required by the Authority's QA Program will be ANSI N45.2.6-1978 certified during and after the transfer of inspection personnel to the line organization.	Within 30 days of NRC approval of this request.
JPN-98-027-002	Revise the UFSAR to clearly state that receipt inspectors will be ANSI N45.2.6-1978 certified.	Next UFSAR update issued 6 or more months after NRC approval.