

123 Main Street
White Plains, New York 10601
914 681.6950
914 287.3309 (Fax)



James Knobel
Senior Vice President and
Chief Nuclear Officer

June 16, 1998
IPN-98-072
JPN-98-025

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
Regarding Supplier Evaluations**

- References:
- 1.) NYPA letter (IPN-98-001 / JPN-98-001), "Change to the Quality Assurance Program Description Regarding Supplier Evaluations," dated January 8, 1998.
 - 2.) NRC letter, G. Wunder to J. Knobel, "Request for Additional Information - James A. FitzPatrick and Indian Point Nuclear Generating Unit No. 3 (TAC No.s MA0219, MA1134, MA0231, and MA0629)," dated May 7, 1998.
 - 3.) 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 the Receipt Inspection Function," dated November 24, 1997.
- 1/1*
0004

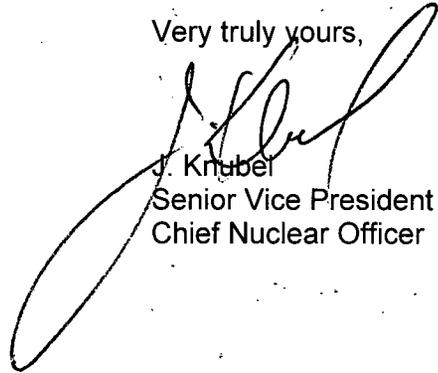
Dear Sir:

The Authority submitted Reference 1 to request a change to the Quality Assurance Program regarding supplier evaluations. In Reference 2, the NRC requested that the Authority modify its QA Program Description and associated commitments to reflect the alternate process which will be utilized to evaluate suppliers (Question 2). Attachments I and II contain the requested modifications to the QA Program Description (Chapter 17 of the Final Safety Analysis Report (FSAR)) for the Indian Point 3 and James A. FitzPatrick plants. These pages supersede the FSAR pages submitted with Reference 1. The revised commitments made by the Authority in this submittal are contained in Attachment III. These revisions do not alter the conclusions presented in Reference 1 which state that the Authority's QA Program will remain in compliance with 10 CFR 50, Appendix B and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

9806220234 980616
PDR ADOCK 05000286
P PDR

Reference 2 also contained a question on a different Authority submittal (Reference 3). This question will be answered under separate cover. If you have any questions concerning this matter, please contact Ms. C. D. Faison.

Very truly yours,



J. Knubel
Senior Vice President and
Chief Nuclear Officer

Attachments: as stated
cc: See next page

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

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, NY 10511

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
P.O. Box 137
Lycoming, NY 13093

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

Mr. Joseph F. Williams, Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
U.S. Nuclear Regulatory Commission
Mail Stop OWFN 14E21
Washington, DC 20555

Attachment I to IPN-98-072 / JPN-98-025

FSAR Revision for Indian Point 3

(Additions shown in **bold**.)

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

IP3
FSAR UPDATE

15. **Auditing of Quality Assurance Programs for Nuclear Power Plants (Regulatory Guide 1.144, January 1979)**

Auditing of Quality Assurance programs conforms to Regulatory Guide 1.144 with the following exception:

In lieu of annual audits of suppliers, documented ongoing evaluations of suppliers will be utilized. Where applicable, this evaluation will take into account:

- (1) review of supplier-furnished documents such as certificates of conformance, nonconformance notices, and corrective actions;**
- (2) results of previous source verifications, audits, and receiving inspections;**
- (3) operating experience of identical or similar products furnished by the same supplier; and**
- (4) results of audits from other sources (e.g., customer, ASME, or NRC audits).**

The results of the evaluations will be reviewed and appropriate corrective action taken. Adverse findings resulting from these evaluations will be periodically reviewed in order to determine if, as a whole, they result in a significant condition adverse to quality and to provide input to support supplier audit activities conducted by the Authority or a third party auditing entity.

Attachment II to IPN-98-072 / JPN-98-025

FSAR Revision for James A. FitzPatrick

(Additions shown in **bold**.)

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
DPR-59

JAF
FSAR UPDATE

CHAPTER 17

QUALITY ASSURANCE PROGRAM

17.2 QUALITY ASSURANCE PROGRAM - OPERATIONS

17.2.0 INTRODUCTION

The New York Power Authority, hereinafter called the Authority, has the ultimate responsibility to assure safe and efficient production of electrical energy at the James A. FitzPatrick Nuclear Power Plant. To meet this responsibility the Authority has established a comprehensive Quality Assurance Program which applies to those structures, systems, and components of the Nuclear Power Plant that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The Program has been developed to provide adequate confidence that the plant and its components will perform satisfactorily in service. The Program requires that activities such as operations, testing, design changes, modifications, maintenance, repairs and refueling are accomplished in accordance with applicable codes, specifications and regulatory requirements.

This Program has been developed into 18 sections to comply with the respective NRC management principles delineated in Appendix B to 10 CFR 50 and Section 17.2 of the NRC Standard Review Plan NUREG-75/087 (II-24-75). It also complies with the guidance set forth in WASH 1283 (Guidance on Quality Assurance Requirements During the Design and Procurement Phases of Nuclear Power Plants), dated May 24, 1974, WASH 1309 (Guidance on Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants), dated May 10, 1974, and WASH 1284 (Guidance on Quality Assurance Requirements During the Operations Phase of Nuclear Power Plants), dated October 26, 1973. **One exception to these documents concerns the evaluation of suppliers. In lieu of annual audits of suppliers, documented ongoing evaluations of suppliers will be performed. Where applicable, these evaluations will take into account: (1) review of supplier-furnished documents such as certificates of conformance, nonconformance notices, and corrective actions; (2) results of previous source verifications, audits, and receiving inspections; (3) operating experience of identical or similar products furnished by the same supplier; and (4) results of audits from other sources (e.g., customer, ASME, or NRC audits). The results of the evaluations will be reviewed and appropriate corrective action taken. Adverse findings resulting from these evaluations will be periodically reviewed in order to determine if, as a whole, they result in a significant condition adverse to quality and to provide input to support supplier audit activities conducted by the Authority or a third party auditing entity.**

The Quality Assurance Program requires that personnel of the Authority act in accordance with applicable requirements of this program and the procedures which support its implementation. Authority management shall give support to maintaining and implementing an effective Quality Assurance Program. Outside organizations that are delegated activities which fall within the scope of the Quality Assurance Program are required to establish and implement a Quality Assurance Program that is in compliance with applicable portions of 10 CFR 50, Appendix B, and requirements of the Authority.

Attachment III to IPN-98-072 / JPN-98-025

Commitments

NEW YORK POWER AUTHORITY

INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286

DPR-64

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333

DPR-59

Commitment List

Indian Point 3

Commitment Number	Commitment	Due Date
IPN-98-072-01 (Revises IPN-98-001-01)	<p>Auditing of Quality Assurance programs conforms to Regulatory Guide 1.144 with the following exception:</p> <p>In lieu of annual audits of suppliers, documented ongoing evaluations of suppliers will be utilized. Where applicable, this evaluation will take into account:</p> <ul style="list-style-type: none"> (1) review of supplier-furnished documents such as certificates of conformance, nonconformance notices, and corrective actions; (2) results of previous source verifications, audits, and receiving inspections; (3) operating experience of identical or similar products furnished by the same supplier; and (4) results of audits from other sources (e.g., customer, ASME, or NRC audits). <p>The results of the evaluations will be reviewed and appropriate corrective action taken. Adverse findings resulting from these evaluations will be periodically reviewed in order to determine if, as a whole, they result in a significant condition adverse to quality and to provide input to support supplier audit activities conducted by the Authority or a third party auditing entity.</p>	Within 30 days of NRC approval of this request.
IPN-98-072-02	Revise FSAR to incorporate the draft of FSAR page 17.2B-6 submitted with this letter.	Next FSAR Update which is issued 6 or more months after NRC approval of this request.

James A. FitzPatrick

Commitment Number	Commitment	Due Date
JPN-98-025-01 (Revises JPN-98-001-01)	One exception to the documents listed in Paragraph 2 of FSAR page 17.2-1 concerns the evaluation of suppliers. In lieu of annual audits of suppliers, documented ongoing evaluations of suppliers will be performed. Where applicable, these evaluations will take into account: (1) review of supplier-furnished documents such as certificates of conformance, nonconformance notices, and corrective actions; (2) results of previous source verifications, audits, and receiving inspections; (3) operating experience of identical or similar products furnished by the same supplier; and (4) results of audits from other sources (e.g., customer, ASME, or NRC audits). The results of the evaluations will be reviewed and appropriate corrective action taken. Adverse findings resulting from these evaluations will be periodically reviewed in order to determine if, as a whole, they result in a significant condition adverse to quality and to provide input to support supplier audit activities conducted by the Authority or a third party auditing entity.	Within 30 days of NRC approval of this request.
JPN-98-025-02	Revise FSAR to incorporate the draft of FSAR page 17.2-1 submitted with this letter.	Next FSAR Update which is issued 6 or more months after NRC approval of this request.