Stephen B. Bram Vice President

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May 9, 1994

Re: Indian Point Unit No. 2 Docket No. 50-247

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

SUBJECT: Quality Assurance Program Description Revision 11 Supplemental Submittal

This letter submits revised pages to QAPD, Revision 11, previously submitted to the NRC on December 21, 1993.

The revised pages are being submitted to clarify the responsibilities of the Nuclear Projects QC Coordinators/Planners and the independent overview responsibilities of Nuclear Quality Assurance as discussed in a conference call with NRC personnel on March 4, 1994.

The specific revised pages and the associated explanations are contained in Attachment A to this letter.

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

Very truly yours,

cc: Mr. Thomas T. Martin Regional Administrator - Region I US Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

> Mr. Francis J. Williams, Jr., Project Manager Project Directorate I-1 Division of Reactor Projects I/II US Nuclear Regulatory Commission Mail Stop 14B-2 Washington, DC 20555

Senior Resident Inspector US Nuclear Regulatory Commission PO Box 38 Buchanan, NY 10511

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Attachment A

Explanation of changed pages.

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- 1. Page 20 paragraph 4 has been revised to substitute the term "work verification packages" for "modification implementing packages" to more accurately reflect the purpose and content of these packages.
- 2. Page 25 paragraph 1 has been revised to clarify the QC documentation contained in work verification packages (WVP's) which are assembled by QC Coordinator/Planners.
- 3. Page 25 paragraph 2 was revised to indicate that the Project Superintendents review the WVP's to assure their consistency with the scope of the modification.
- 4. Page 25 paragraph 3 was revised to clarify that Nuclear Quality Assurance conducts overview inspections, surveillances and/or audits on a nominal quarterly basis, or more frequently when plant modifications are being implemented.
- 5. Page 25A This page has been included because the additional information on page 25 caused an overrun of available space on page 25.

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The Operations Manager, or his designee, specifies on each work order whether Projects and Planning or Instrumentation and Control, is responsible for the work. Questions involving the assignment of these responsibilities are resolved by managers of the respective groups, or their designees.

For work managed by Nuclear Power, Projects and Planning or Instrumentation and Control, as applicable, is responsible for the correctness of the work order and implementing documents and

- o designates the work group,
- o updates work orders with any changes or additional information as required,
- o prepares schedules in conjunction with operations and applicable work groups,
- o prepares implementing documents for the work order as required, and enters this information on the work order. 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 Instrumentation and Control are reviewed for adequacy and correctness by a qualified person other than the preparer. This latter review constitutes an independent review.

In the case of other projects (ex. major capital projects) managed by Nuclear Projects, work verification packages are assembled by Nuclear Projects QC Coordinators/Planners. The work verification packages are also reviewed for adequacy and correctness by a qualified person other than the preparer.

Test & Performance reviews the results of Post Maintenance Testing to verify that acceptance criteria has been satisfied and indicates this on the work order.

5.2.7.2 <u>Modifications</u>

When the work constitutes a modification to the plant, modification documentation is prepared by either Central Engineering or Plant Engineering as determined by the Chief Plant Engineer in consultation with Central Engineering, as necessary. This determination is based primarily on job complexity (e.g., scope and design impact) with the more complex jobs generally assigned to Central Engineering.

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After the modification documentation is issued implementation, supplemental work verification packages for (WVP's) are assembled by Nuclear Projects QC Coordinators/Planners. These WVP's consist of forms, checklists, etc. and information which, when compiled and completed will provide objective evidence of the proper completion The WVP's contain, as applicable, the of the work. following types of records and information:

Summary of scope of work as identified in the 1. Engineering modification package.

An index of records included in the WVP. 2.

3. Weld information forms. 4.

- Electrical disconnect and reconnect forms.
- 5. Cable pull slips. 6.
- Cable tray inspection checklists. 7.
- Conduit installation records. 8.
- Test data records. 9.
- Torquing records.
- 10. Grouting checklists.
- 11. Material used forms.
- 12. Cleanliness records.
- 13. Work completion walkdown records.
- 14. WVP content checklist.

The QC Coordinators/Planners specify those work steps to be verified and signed off by Field Supervisors and those independent hold points or inspection points that will be performed by QC Coordinators/Planners. The WVP's are reviewed and approved by the responsible Project Superintendent to assure the WVP is consistent with the scope of the modification. Nuclear Projects QC Coordinators/Planners report to Nuclear Projects Project Superintendents. The QC Coordinators/Planners are independent of the Field Supervisors who are directly responsible for the work.

In addition to the QC functions performed by the Nuclear Projects QC Coordinators/Planners, Nuclear Quality Assurance (an organization independent of Nuclear Projects), will conduct overview inspections, surveillances and/or audits of selected activities of Nuclear Projects. The overview inspections, surveillances or audits will be conducted when plant modifications are being implemented a nominal quarterly basis or more frequently. Additionally, where special qualifications are required to perform examinations (e.g., non-destructive examinations) Nuclear Quality Assurance inspection personnel may supplement the activities of Nuclear Projects QC Coordinators/Planners.

Nuclear Power Instrumentation and Controls prepares work procedures, as necessary, to implement modifications to installed instrumentation. 25

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

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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.