

POWER AUTHORITY OF THE STATE OF NEW YORK

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August 3, 1981
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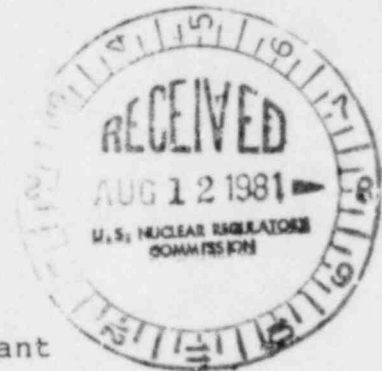
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Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Qualification of Inspection, Examination and Testing of
Audit Personnel (Generic Letter 81-01), dated May 4, 1981



Dear Sir:

The Authority has reviewed the subject Generic Letter which requested a commitment to meet: (1) regulatory positions C.5, C.6, C.7, C.8 and C.10 of Regulatory Guide 1.58, Revision 1 (September, 1980) which endorses ANSI N45.2.6-1978 with certain exceptions, and (2) Regulatory Guide 1.146, Revision O (August, 1980) which endorses ANSI N45.2.23-1978 with certain exceptions. The Authority has determined that it shall comply with the requirements of the above mentioned Regulatory Guides and standards except as delineated herein.

Regulatory Guide 1.146, Revision O (August 1980)
ANSI N45.2.23

Certifications for lead auditors shall be accomplished and documented in accordance with ANSI N45.2.23 with the alternative of satisfying paragraph 4.2 as indicated below. The need for certification in accordance with the requirements of paragraph 4.2 shall be determined on an individual basis commensurate with previous experience and training. The Authority designated Quality Assurance supervisors may waive the requirements of paragraph 4.2 and utilize the following type data for purposes of certification of a lead auditor:

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S.10

- o Experience records which include identification of the performance of audits necessary to fulfill the requirements of paragraph 2.3.4 whether performed through previous employment or with the Authority.
- o Certification records to N45.2.23 from a previous employer, if applicable.
- o On-the-job training with the Authority staff to become knowledgeable of our audit program and related procedures.
- o Participation in audits with and under the direction of Authority lead auditors.

The objective evidence of qualification in such cases would be maintenance of the experience records from previous employment, records of on-the-job training, and identification of the audit reports performed with and under the supervision of an Authority lead auditor in lieu of a specific examination. Final authority for certification shall be the responsibility of the Authority designated Quality Assurance supervisors.

The Authority believes this approach provides an acceptable alternative to the ANSI standard for certifying lead auditors who may qualify through experience.

Regulatory Guide 1.58, Revision 1 (September, 1980)
ANSI N45.2.6-1978

Regulatory Position C.6

The Authority does not believe that a high school diploma or equivalent should be mandatory as indicated by Regulatory Position C.6. The Authority strongly believes that an individual's technical training, experience and performance capability are the more significant parameters for establishing qualifications. The Authority, therefore, intends to comply with the requirements of the ANSI standard as delineated, in lieu of Regulatory Position C.6.

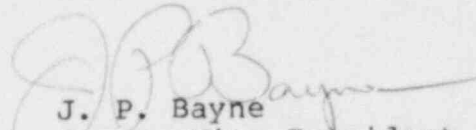
Regulatory Position C.10

Determination of the qualifications of a new Authority employee will be accomplished in accordance with the requirements of Section 3.5 of the ANSI Standard amplified by the following: all new Authority employees are assigned a probationary period. During this period, new employees receive on-the-job training and assigned work tasks. An ongoing evaluation of the employee's performance is conducted by appropriate supervision and, at the end of the probationary period, the evaluation is documented.

Depending upon education, experience and day-to-day performance, a person may or may not be qualified until the probationary evaluation has been completed. The Authority utilizes this evaluation process as the measure for determining an individual's competence prior to formal certification. The Authority believes that this evaluation of practical performance is the most credible method to determine an individual's qualifications. In addition, written or oral tests may be used in conjunction with the evaluation as determined and directed by the appropriate supervisor to verify satisfactory experience. Furthermore, the Authority believes that passing a written test designed to demonstrate that an individual has "comparable" competence to that which would have been gained by education, would not necessarily provide proper evidence of an individual's capability to perform an assigned technical function.

Authority personnel and personnel provided by a contractor to the Authority for plant quality assurance services presently comply with the above mentioned Regulatory Guides and their associated ANSI standards including the alternatives provided herein with regard to qualifications. Certifications of these personnel are presently to the old standards and will be upgraded to the new standards by July 1, 1982.

Very truly yours,


J. P. Bayne
Senior Vice President
Nuclear Generation

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