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Vice President

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June 19, 1984

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

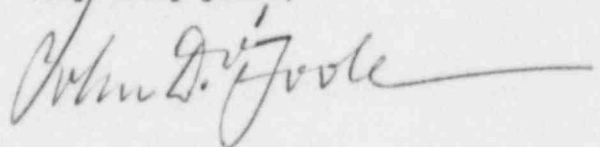
Mr. Thomas T. Martin, Director
Division of Engineering and
Technical Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Martin:

This refers to the operations assessment team inspection 50-247/84-03 conducted by Mr. A. T. Gody of your office on February 13-24, 1984 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your April 26, 1984 letter, Appendix C, identified areas that require increased management attention. Our response is presented in Attachment A to this letter.

Should you or your staff have any questions, please contact us.

Very truly yours,



cc: Senior Resident Inspector
U. S. Nuclear Regulatory Commission
Post Office Box 38
Buchanan, New York 10511

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ATTACHMENT A

84-03-01

A.1 - (4.3.2)

Engineering Operations Manual OP-290-1 Section 5 procedures were revised prior to the inspection and have since been expanded to further reflect the requirements of the Corporate Engineering Management Model as it applies to the requirements to control modifications at Indian Point. Formal procedures to support the current Engineering work practices and the Corporate Engineering Management model have been completed by the Nuclear Power, Quality Assurance and Construction organizations subsequent to the inspection.

84-03-02

A.2 - (4.3.3)

Immediately after the inspection, Central Engineering issued and implemented Advance Change Notice Numbers 8 and 9 to OP-290-1, Section 5 consisting of a design review check list and expanded requirements for design verification. These requirements provide a consistent interpretation of documentation requirements, formal guidance for documenting independent reviews, and documentation of the results of the independent reviews. These requirements are now incorporated into a separate design verification procedure Section 5.13 of OP-290-1 which will supercede the Advance Change Notices when it is issued. This new procedure has been approved and will be issued by June 30, 1984.

84-03-03

E.3 - (4.3.4)

Requirements for training of Engineering personnel are contained in Section 5.17 of OP-290-1. In the past, these training requirements have been solely in the programmatic requirements of CI-240-1 and Engineering Operations Manual OP-290-1, Section 5. This is in accordance with the submittal of Con Edison's Quality Assurance program dated June 3, 1977, Table A, Item No. 61.

However, Advance Change Notice II to OP-290-1 has been issued to include formal technical training requirements in Section 5.17. These include a requirement for selected persons in each Engineering

department to take the "Nuclear Power Plant Systems" course or equivalent and be available for consultations on the areas covered by the course. This Advance Change Notice also requires Subsection Engineers to give annual consideration of persons reporting to them to determine what technical training might improve their proficiency and to nominate selected persons for such training. These requirements are being implemented.

84-03-04

A.3 - (5.5.3)

Station Administrative Order (SAO) 127 "Modifications to Indian Point 2 Facilities" has been revised and implemented to improve the modification tracking process. In addition, SAO-104 "Maintenance Work Request (MWR) Procedure" is being completely rewritten to upgrade the Maintenance Work Request (MWR) system and is scheduled for implementation by July, 1984.

84-03-05

C.1 - (7.5.2.1)

Power Generation Maintenance (PGM) will prepare an Administrative Control Procedure defining PGM's interfaces while performing work at Indian Point Unit 2. This procedure will be completed by the end of June 1984.

(7.5.2.2)

PGM has initiated a revision to OP-260-3, "Maintenance and Modifications of Nuclear Power Plant Components at Van Nest", which will address the current Van Nest Organization and the exceptions identified in Procedure Waiver 2 (W-2), "Methods of Accomplishing Repairs at Van Nest Shop." This revision is expected to be completed by the end of June, 1984.

(7.5.2.3)

Appropriate Maintenance Administrative Directives have been revised to better address the Maintenance Departments involvement in the modification process. All changes to the procedures listed in Attachment 3 have been completed and the procedures implemented, except as follows. SAO 104 is under final review and is scheduled for implementation July, 1984. MPAD-3 is being written, and is scheduled for approval and implementation by the end of June, 1984.

84-03-06

E.1 - (7.5.3.1)

The Maintenance Department had recently started a career advancement program as part of their formal training program. A career advancement program which includes mechanical and electrical

skills training and plant specific training such as QA and QC procedures, work permits and operating orders, maintenance procedures and policies and introduction to plant systems, for Electric Construction Bureau (ECB) and PGM personnel is under review and consideration by the respective groups. This review is scheduled for completion by August 10, 1984.

(7.5.3.2)

The maintenance procedures and policies course for the Maintenance Departments was upgraded to make the recommended improvements i.e., include the Maintenance Administrative Directives pertinent to performing Class "A" maintenance and include the station procedures for the processing of MWR's.

(7.5.3.3)

A formal classroom and on-the-job training program for I&C technicians that meets INPO guidelines for accreditation is under a phased development. The first phase of this program is scheduled to be implemented by November, 1984. Full implementation of this program is scheduled for late 1986.

(7.5.3.4)

A formal training program which will include the career advancement program mentioned in 7.5.3.1 for ECB personnel who work at Indian Point 2 is under review and consideration by ECB. This review is scheduled for completion by August 10, 1984.

E.2 - (7.5.3.5)

Refueling/Maintenance outage training for non-licensed Nuclear Plant Operators (NPO) will be conducted on modifications/new installations resulting from the 1984 outage. Similar training will also be provided to Licensed Operators and Shift Technical Advisors. This training is scheduled for completion by December 31, 1984

84-03-07

D.1 - (8.2.1)

At the time of the OAT inspection there were five formal procedures in place detailing receipt inspection requirements. These are:

QA-740, "Administration of QC Receipt Inspection," dated March 31, 1982.

QA-741, "Details on Administration of QC Receipt Inspection Areas," dated March 31, 1982.

QA-742, "Sampling Plans for Inspections," dated March 31, 1982.

QA-743, "Receipt Inspection Security," dated March 31, 1982.

In addition to the above, a new procedure "Use of Receipt Inspection Checklist" was issued May 1, 1984. This procedure details how to prepare and use the checklist.

84-03-08

D.2 - (8.3.1.1)

Cognizant senior company managers met during the inspection. During and subsequent to the inspection, all material in the warehouse was re-inspected for damage and improper material storage. Material so identified was then protected, segregated and stored in accordance with the ANSI Standard N45.2.2 provisions of the Con Edison Quality Assurance Program. Procedures have been upgraded and new procedures written. To further facilitate proper segregation of material, an additional 2000 square feet of warehouse area was made available.

In addition, a Shelf-life Program and Preventive Maintenance Program has been defined and procedures implementing them are scheduled for August, 1984. Additional existing procedures were reviewed and have been strengthened where necessary. A review and a plan were immediately developed for material storage and handling procedures to assure adequate continued management of this effort. Those procedures cover receiving, storage and handling of Class A material, training and record keeping, shelf-life, preventive maintenance, housekeeping and timely response to Quality Control Inspection Reports. Procedures are planned for completion by August, 1984.

84-03-09

D.3 - (8.3.1.2)

Procedures to control shelf-life, perform preventive maintenance (PM) on stored components, and to perform general care of stored components have been developed. These procedures will be implemented by August, 1984.

84-03-10

B.1 - (9.1.1)

Quality Assurance and Reliability has reviewed all QA&R department operating procedures and identified those that already required revision consistent with the subject item. QA procedures not identified below have been determined not to require revision:

- (1) The following procedures have been revised to reflect the current QA&R organization:

CI-240-1, "Quality Assurance Program for Operating Nuclear Plants," dated April 19, 1984.

QA-500, "Procedure for QA Review of Engineering Documents," dated March 30, 1984.

QA-502, "Procedure for QA Engineering Review of Modification Packages Prior To Their Release to Central Files By Engineering," dated March 30, 1984.

- (2) The following procedures will be revised by July 15, 1984 to reflect the current QA&R organization:

QA-501, "Procedure for Administrative Processing of Documents Requiring Quality Assurance Engineering Review."

QA-503, "Procedure for Reviewing Purchase Requisitions."

QA-100, "Maintenance and Review of Implementing Procedures and Quality Assurance Program."

QA-103, "Preparation, Control and Distribution of Quality Assurance Operating and Technical Procedures."

QA-202, "Review of Nuclear Class "A" Purchase Orders For The Establishment of Vendor Surveillance Requirements."

QA-204, "Inspection Report."

QA-400, "Audit Program for Operational Nuclear Facilities."

QA-420, "Quality Assurance Management Program for Nuclear Fuel."

QA-430, "Qualification of Audit Personnel."

QA-440, "Maintenance and Storage of Audit Records."

QA-410, "Audit Program for Nonradiological Environmental Technical Specification Requirements."

- (3) The following procedures will be revised by July 15, 1984 by Nuclear Power Quality Assurance (NPQA) to reflect the current QA&R organization:

QA-735, "Inservice Inspection Program for Indian Point Unit No. 2."

QA-740, "Administration of QC Receipt Inspection."

QA-751, "Inspection of Welding."

QA-752, "Preparation and Control of Weld Information Forms (WIF)."

QA-753, "Marking of Class "A" Weld Joints."

QA-754, "Heat Number Control."

- (4) The remaining twelve (12) NPQA procedures will be revised within thirty days after the completion of the Indian Point Unit No. 2 1984 refueling and maintenance outage. These procedures are:

QA-701, QA-710, QA-711, QA-712, QA-720, QA-731,
QA-733, QA-734, QA-741, QA-742, QA-743, and
QA-760

- (5) Prior to the OAT inspection, Con Edison had been making extensive changes to the system for controlling design and modifications. Although the current revision of CI-240-1 did not yet reflect all the changes that had been made, members of the OAT team were shown a draft of the instruction reflecting the new interfaces, responsibilities, and practices established by the Central Engineering Management Model. Our plan is to complete implementation of the new practices and issue a revised CI-240-1 to reflect these practices by July 15, 1984.

- (6) Although CI-240-1, the program document, has not been revised, the actual QA operating procedures had been revised to reflect current practices per the Central Engineering Management Model. These are:

QA-500, "Procedure for QA Review of Engineering Documents," issued March 30, 1984.

QA-502, "Procedure for QA Engineering Review of Modification Packages Prior To Their Release To Central Files by Engineering," issued March 30, 1984.

84-03-11

A.2 - (9.1.1)

Engineering procedures OP-290-1, Section 5 require that in order for immediate supervisors to perform design verification they shall not specify a singular design approach and they must meet other requirements for independence. The control for meeting this condition in the past has been reliance on the supervisor following the requirements of the procedures.

In order to achieve additional control, it is intended to have the immediate superior of the supervisor document his concurrence with the independence of the supervisor for each design verification performed by a supervisor. This documentation shall be part of the verification documentation and use of supervisors shall be predicated upon the lack of timely availability of a qualified person other than the supervisor to do the verification.

The procedure for implementing these requirements has been approved. It will be issued by June 30, 1984.

84-03-12

E.4 - (9.2.1)

Training requirements for corporate QA and other QA&R personnel are delineated in procedure QA-101, "Quality Assurance & Reliability Training Program" issued in 1975 and revised in 1981. This procedure provides for both formal and informal training of QA&R personnel. The nature and extent of each individual's training needs is for the most part determined by his immediate supervisor based upon education, experience, prior training, and immediate and future responsibilities. Training includes formal Con Edison training courses, e.g., plant systems courses, and training provided by outside sources either at Con Edison or other facilities. These have included formal Lead Auditor Training, nuclear quality assurance, and environmental qualification of electrical equipment.

QA-101 also provides for the maintenance of QA personnel training records. Training records for corporate QA personnel are being reviewed and will be made current by July 1, 1984.

QA-101 and the QA training program in general will be reviewed to determine what criteria for training needs may need strengthening. The results of this review and any recommendations for strengthening our formal training program will be completed within thirty days after the completion of the 1984 Indian Point Unit No. 2 refueling and maintenance outage.

84-03-13

B.2 - (9.3.1)

At the time of the OAT inspection, our system for ensuring that the applicable criteria of 10 CFR 50 Appendix B were included in audits was based on a review of the criteria by the auditor(s) and his supervisor to ensure that all applicable criteria were addressed in the audit plan and checklist. The OAT representatives suggested that our system could be improved if the existing audit program matrix, which they were shown, identifying Plant Technical Specifications was expanded to include the eighteen criteria of 10 CFR 50B. This expanded matrix, suggested by OAT, has been implemented.

84-03-14

B.3 (9.3.2) (9.1.1)

QA-504, "Application and Control of Directory of Quality Assurance Requirements (DOQAR)" will be issued by July 15, 1984.