

UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION I
970 BROAD STREET
NEWARK, NEW JERSEY 07102

OCT 2 1972

J. G. Keppler, Chief, Reactor Testing and Operations Branch
Directorate of Regulatory Operations, HQ

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT 1
RO INSPECTION REPORT NO. 50-220/72-00²

The subject inspection report is forwarded for your information.

The draft quality assurance program for operations of the Nine Mile Point 1 Nuclear Power Station was forwarded to this office by letter dated March 7, 1972. A review was performed of this program, in this office, and it was found that eight of the criteria of Appendix B, 10 CFR 50, were either incomplete or deficient. A letter has been forwarded to the licensee outlining the deficiencies, however, no reply was requested.

The second review will be performed, upon notification from the licensee that the program deficiencies have been corrected.

E. M. Howard
E. M. Howard, Chief
Reactor Construction Branch

Enclosure:
Subject Inspection Report

cc: P. Morris, RO
H. Thornburg, RO
R. Engelken, RO
J. Henderson, RO
R. Minogue, RS (3)
R. Boyd, L (2)
R. DeYoung, L (2)
D. Skovholt, L (3)
H. Denton, L (2)
RO Files
DR Central Files ✓

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U. S. ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION I

RO Inspection Report No. 50-220/72-02

Subject: Niagara Mohawk Power Corporation

Nine Mile Point 1

License No. _____

Location: Scriba, New York

Priority _____

Category C

Type of Licensee: Power - 610 MWe

Type of Inspection: Review of draft operations QA Program

Dates of Inspection: July 28, 1972 and August 24, 1972

Dates of Previous Inspection: None

Principal Inspector: J. Allentuck
J. Allentuck, Reactor Inspector

9/21/72
Date

Accompanying Inspectors: None

Date

Date

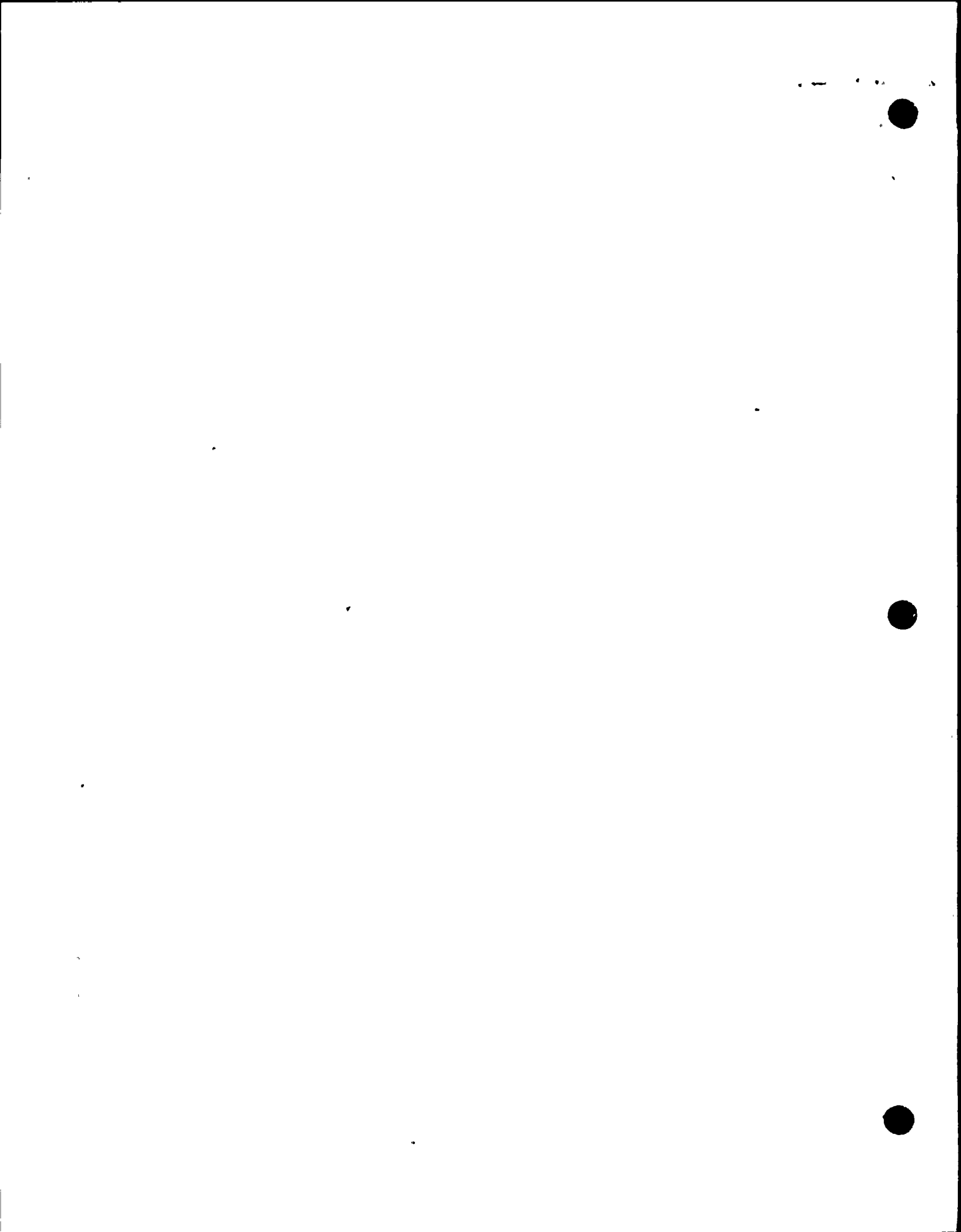
Other Accompanying Personnel: None

Date

Reviewed By: E. M. Howard
E. M. Howard, Chief, Reactor Construction Branch

9-25-72
Date

Proprietary Information: None



SECTION I

Enforcement Action

None

Licensee Action on Previously Identified Enforcement Matters

Not applicable

Unresolved Items

The QA Program for operation failed to comply with requirements of Appendix B, 10 CFR 50, in those criteria listed below:

Criterion I	Reference Section II, Paragraph 2
Criterion II	Reference Section II, Paragraph 3
Criterion V	Reference Section II, Paragraph 4
Criterion VII	Reference Section II, Paragraph 5
Criterion X	Reference Section II, Paragraph 6
Criterion XI	Reference Section II, Paragraph 7
Criterion XVI	Reference Section II, Paragraph 8
Criterion XVII	Reference Section II, Paragraph 9

Status of Previously Reported Unresolved Items

Not applicable

Unusual Occurrences

None

Persons Contacted

Richard Dowd, Supervisor Quality Assurance (non-nuclear)
Thomas Bassett, Supervisor Quality Assurance (nuclear)
Walter Bryant, QA Engineer
Roland Smith, Maintenance Supervisor (Nine Mile Point Power Station)



Management Interview

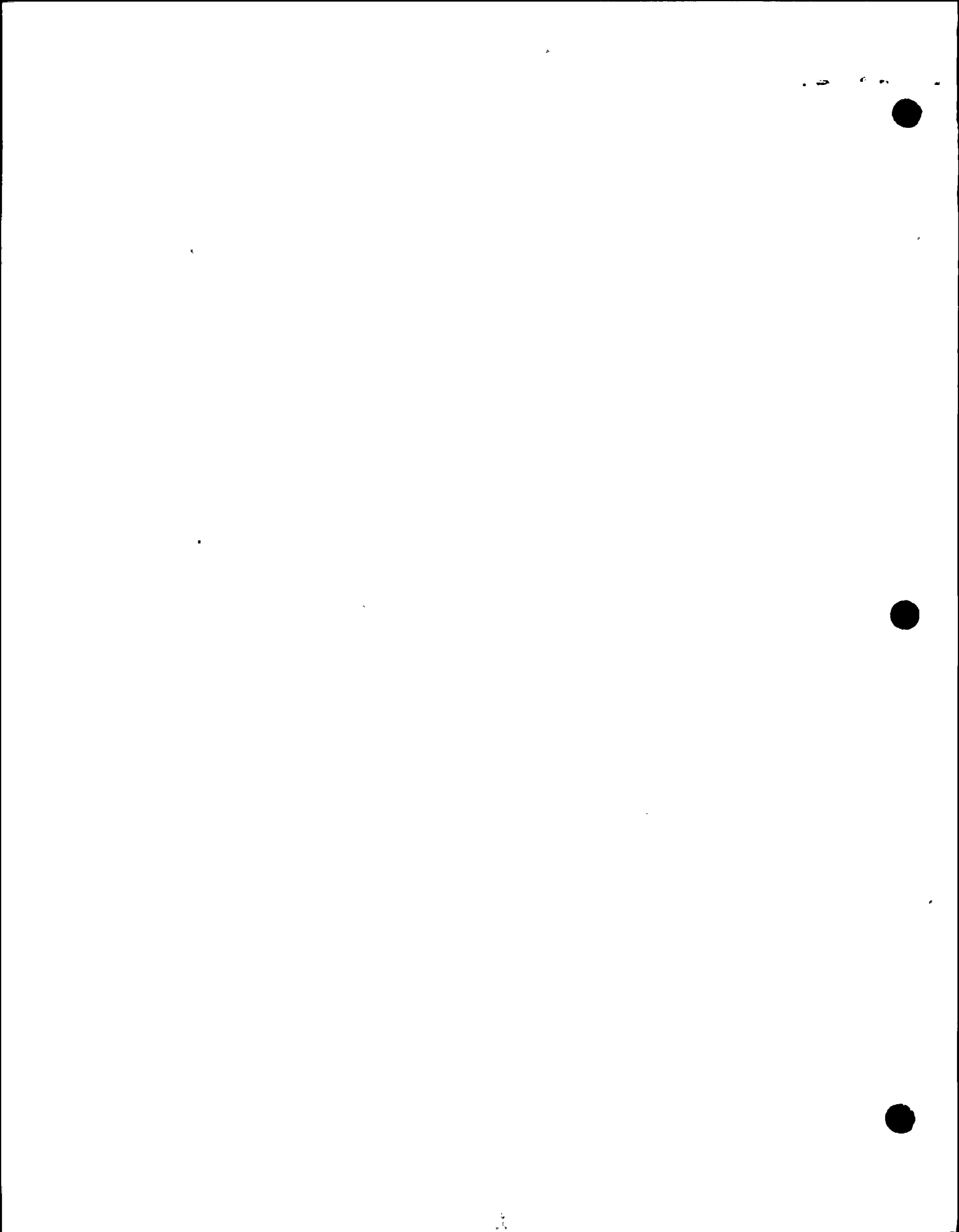
The following persons were present at the management interview on August 24, 1972:

Niagara Mohawk Power Corporation

Richard Dowd, Supervisor Quality Assurance (non-nuclear)
Thomas Bassett, Supervisor Quality Assurance (nuclear)
Roland Smith, Maintenance Supervisor (Nine Mile Point Power Station)

The following subjects were reviewed and discussed:

- A. RO:I stated findings of examination. The program does not comply with 10 CFR 50, Appendix B.
- B. NMPC agreed that current document is not in compliance with Appendix B.
- C. NMPC reiterated that the document submitted was a draft plan.
- D. NMPC agreed to bring into compliance those portions of the program found not to be presently in compliance with Appendix B and to resubmit a revised QA Program.
- E. RO:I stated that the revised QA Program would be reviewed when submitted and comments reported to NMPC.



SECTION II

1. General

The Niagara Mohawk Corporation, Nine Mile Point Unit draft quality assurance program for operations is described in the letter (Schneider to O'Reilly) dated March 7, 1972 as "for the operation of the Nine Mile Point Nuclear Station." In I. "Introduction" the program states "The basic functions of the Quality Assurance and Control Department are to establish and execute such inspections and quality control methods and systems as are required to insure that nuclear power work is fabricated and installed . . . in strict accordance with approved designs, specifications and formal procedures which are established by cognizant engineers." The above statement is overly restrictive of the scope of an operating quality assurance program which should be relevant to all safety related operations of a nuclear power plant, i.e. the refueling operation, health physics, etc. .

The program states that it is in conformance with the quality assurance criteria set forth in 10 CFR 50, Appendix B. The program was compared with requirements of Appendix B.

Details of Subjects Discussed in Section I

2. Criterion I, Organization

The program does not require management measures which provide that the individual assigned the responsibility for checking, auditing, inspecting or verifying that an activity has been correctly performed is independent of the individual directly responsible for performing the specific activity. This is contrary to the requirements of Criterion I which states in part, "In general, the assurance of quality requires . . . that the individual . . . assigned the responsibility for checking, auditing, inspecting, or otherwise verifying that an activity has been correctly performed is independent of the individual . . . directly responsible for performing the specific activity."

3. Criterion II, Quality Assurance Program

The program while identifying some, does not identify all the structure systems and components to be covered by the quality assurance program. In addition, the program does not provide for the indoctrination and training of personnel performing activities affecting quality nor does it



provide for the regular review of the status and adequacy of the quality assurance program. This is contrary to the requirements of Criterion II, which states in part, "The applicant shall identify the structures, systems and components to be covered by the quality assurance program . . . The program shall provide for indoctrination and training of personnel performing activities affecting quality . . . The applicant shall regularly review the status and adequacy of the . . . program."

4. Criterion V Instructions, Procedures and Drawings

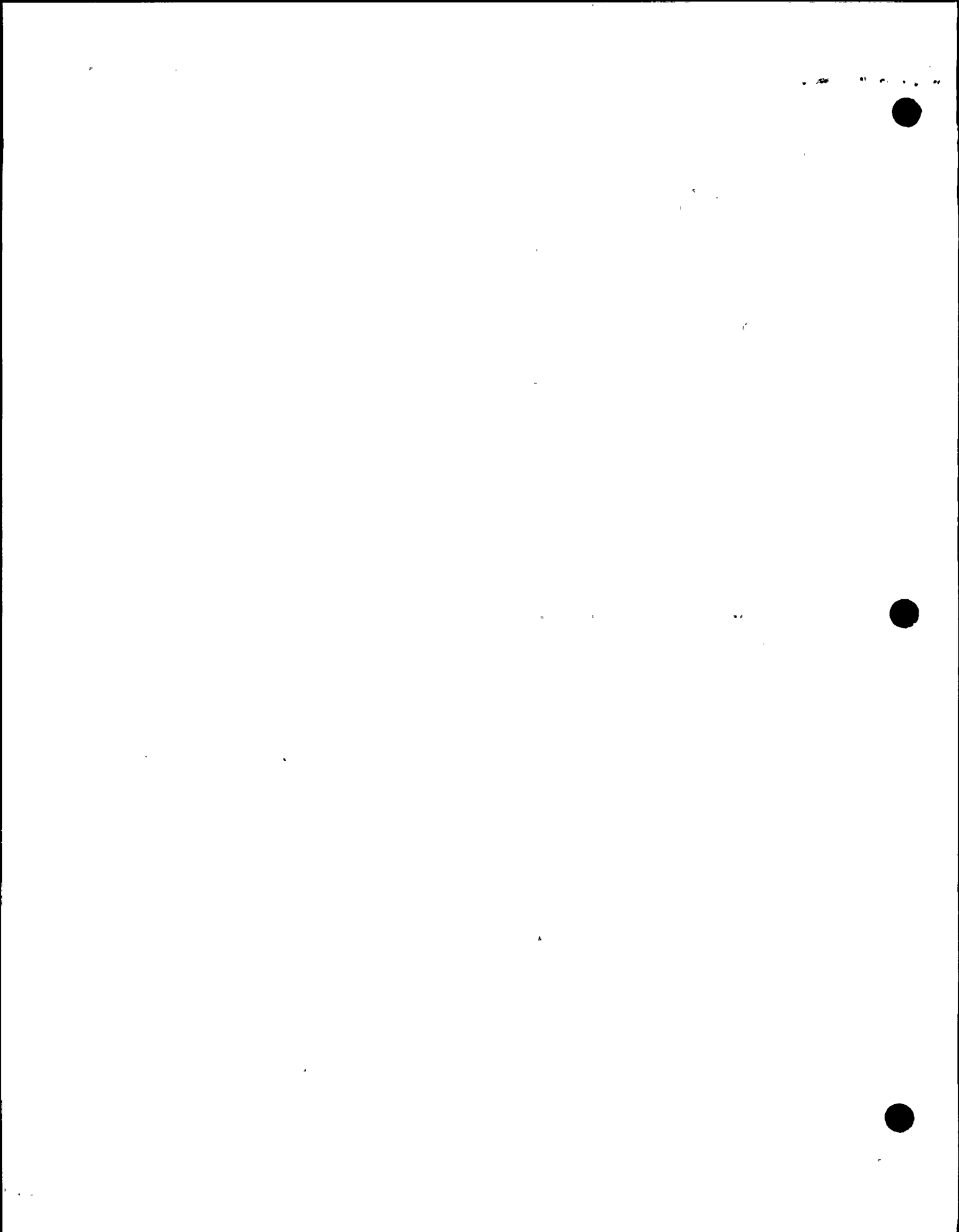
The program does not provide for inclusion of appropriate quantitative or qualitative acceptance criteria, for determining that important activities have been satisfactorily accomplished. This is contrary to the requirements of Criterion V, which states in part, "Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

5. Criterion VII, Control of Purchased Material, Equipment and Services

The program does not require that documentary evidence that material and equipment conform to procurement requirements be available at the power plant site prior to installation or use of such material and equipment. This is contrary to the requirements of Criterion VII, which states in part, "Documentary evidence that material and equipment conform to the procurement requirements shall be available at the nuclear power plant site prior to installation and use of such material and equipment . . . and shall be sufficient to identify the specific . . . codes, standards, or specifications, met . . ."

6. Criterion X, Inspection

The program does not require that inspections shall be performed by individuals other than those who performed the activity being inspected nor does it require that examinations, measurements or tests of materials or products processed be performed for each work operation where necessary to assure quality. This is contrary to the requirements of Criterion X, which states in part, ". . . inspection shall be performed by individuals other than those who performed the activity being inspected. Examinations, measurements or tests . . . shall be performed for each work operation where necessary to assure quality."



7. Criterion XI, Test Control

The program does not contain procedures which assure that all testing required to demonstrate that structures, systems and components will perform satisfactorily in service is identified and performed in accordance with written test procedures. This is contrary to the requirements of Criterion XI, which states in part, "A test program shall be established to assure that all testing required to demonstrate that structures, systems and components will perform satisfactorily in service is identified and performed . . ."

8. Criterion XVI, Corrective Action

The program does not establish measures that assure that failures and malfunctions are promptly identified and corrected nor does it require that for any significant condition adverse to quality the cause of the condition and the corrective action taken are documented and reported to appropriate levels of management. This is contrary to the requirements of Criterion XVI, which states in part, "Measures shall be established to assure that . . . failures, malfunctions, . . . are promptly identified and corrected . . . the identification of the significant condition adverse to quality, the cause of the condition and the corrective action taken shall be documented and reported to appropriate levels of management."

9. Criterion XVII, Quality Assurance Records

The program does not require that the records shall include qualifications of personnel, procedures and equipment nor does it require that inspection and test records identify the inspector or data recorder, the type of observation, the results, the acceptability and the action taken in correction with any deficiencies noted. This is contrary to the requirements of Criterion XVII, which states in part, ". . . records shall include . . . qualifications of personnel, procedures and equipment. Inspection and test records shall . . . identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in correction with any deficiencies noted."



SEP 29 1972

Niagara Mohawk Power Corporation
Attention: Mr. F. J. Schneider
Vice President - Operations
300 Erie Boulevard
Syracuse, New York

Docket No. 50-220

Gentlemen:

This refers to the inspection conducted by Mr. J. Allentuck of this office during the week of July 24, 1972 of activities authorized by AEC License No. DPR-17 and to the discussion of our inspection findings held by Mr. Allentuck with Messrs. Dowd, Bassett, and Smith of your staff on August 24, 1972, at your corporate offices in Syracuse, New York.

The area examined during the inspection related to your quality assurance program for the operations phase. The inspection, which was conducted at this office to facilitate our inspection effort, consisted of selective examinations of quality assurance procedures in the context of the overall quality assurance plan, comparison of your Quality Assurance Plan with the requirements of 10 CFR 50, Appendix B, and discussions with cognizant personnel.

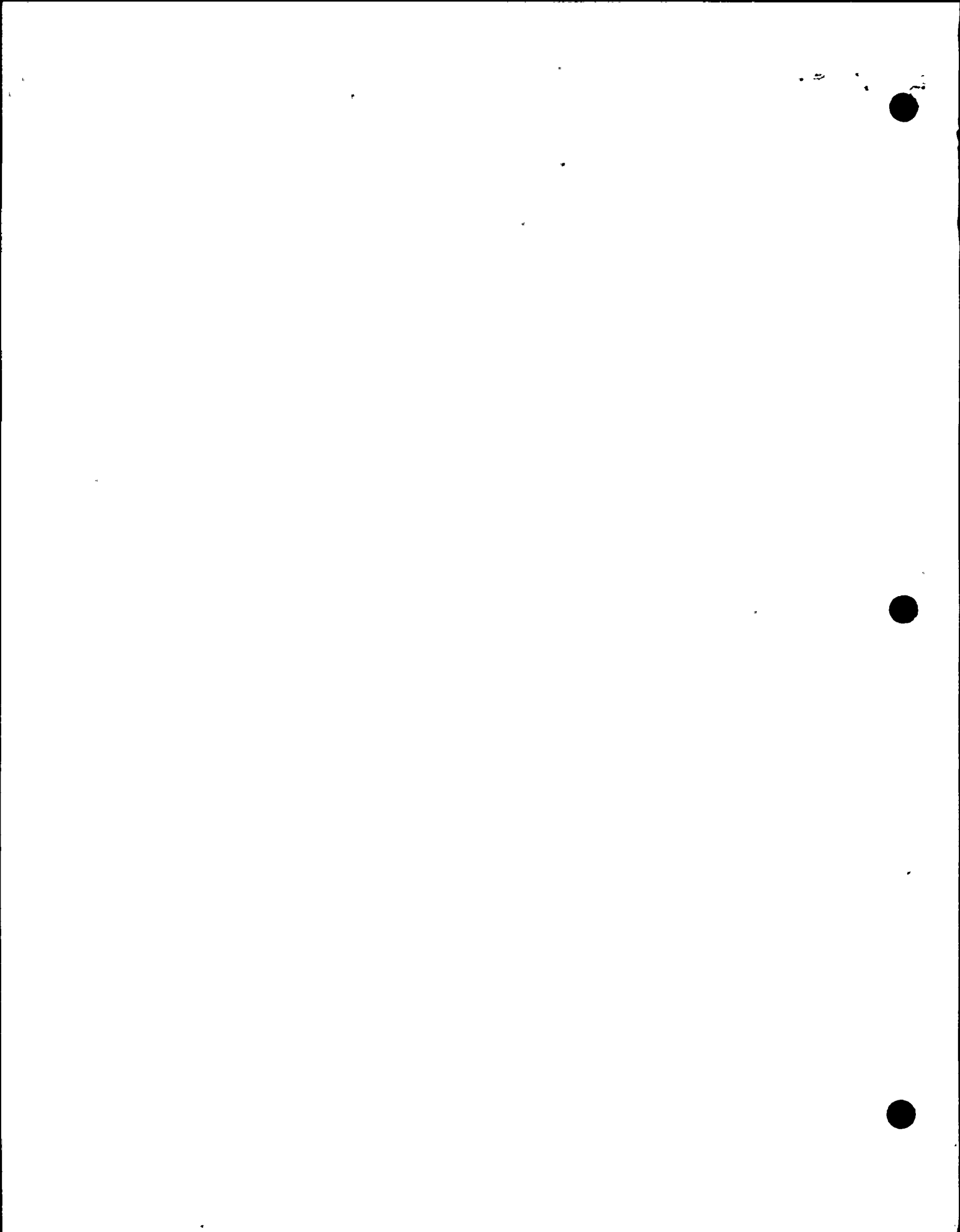
During this inspection, it was found that certain detailed requirements of 10 CFR 50, Appendix B, have been omitted. These items and references to the pertinent requirements are listed in the enclosure to this letter. We understand, based on discussions with your staff, that you intend to supplement and clarify your quality assurance program for the operations phase. Furthermore, we understand that, upon completion, these revisions will be made available for our review.

No reply to this letter is necessary, in that these revisions reflect on your complete Quality Assurance Program and we do not believe it appropriate for you to respond to specific details at this time. We will, however, review your entire program upon completion.

GRESS:I

Howard:ss

O'Reilly



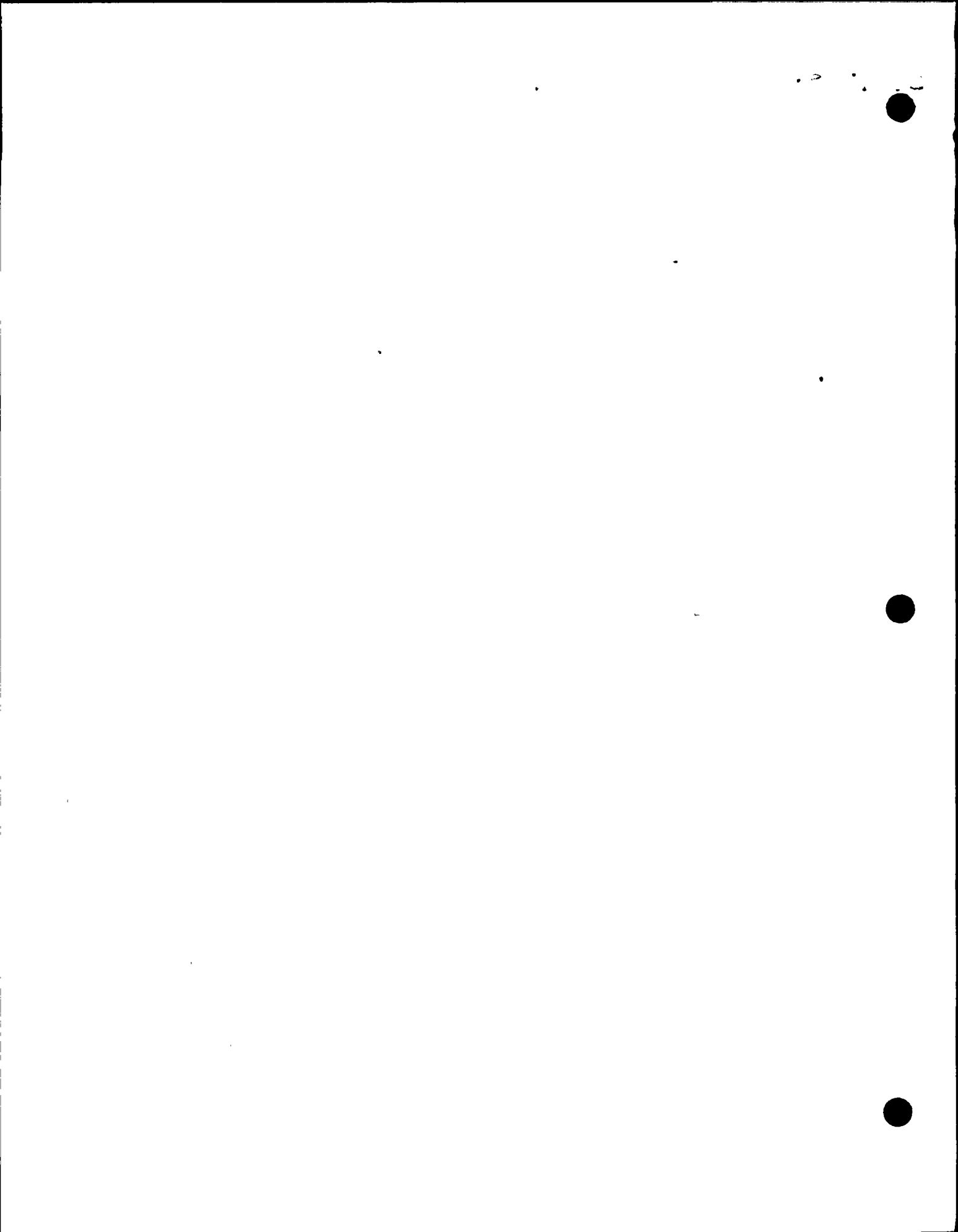
Should you have any question on any item included in the enclosure to this letter, or desire clarification, we will be pleased to discuss them further with you.

Sincerely,

James P. O'Reilly
Director

Enclosure:
Description of Unresolved Items

bcc: A. Giambusso, L
P. Morris, RO
R. Engelken, RO
J. Henderson, RO
OGC
RO Files
DR Central Files
PDR
Local PDR
NSIC
DTIE
NY State



ENCLOSURE

Description of Unresolved Items

Niagara Mohawk Power Corporation
Docket No.: 50-220
License No.: DPR-17

Certain detailed requirements of 10 CFR 50, Appendix B, appear to have been omitted from your proposed Quality Assurance Program. Those items which are identified below are considered to be unresolved:

1. Appendix B, 10 CFR 50, Criterion I, "Organization," states in part: "In general, the assurance or quality requires . . . that the individual . . . assigned the responsibility for checking, auditing, inspecting, or otherwise verifying that an activity has been correctly performed is independent of the individual . . . directly responsible for performing the specific activity."

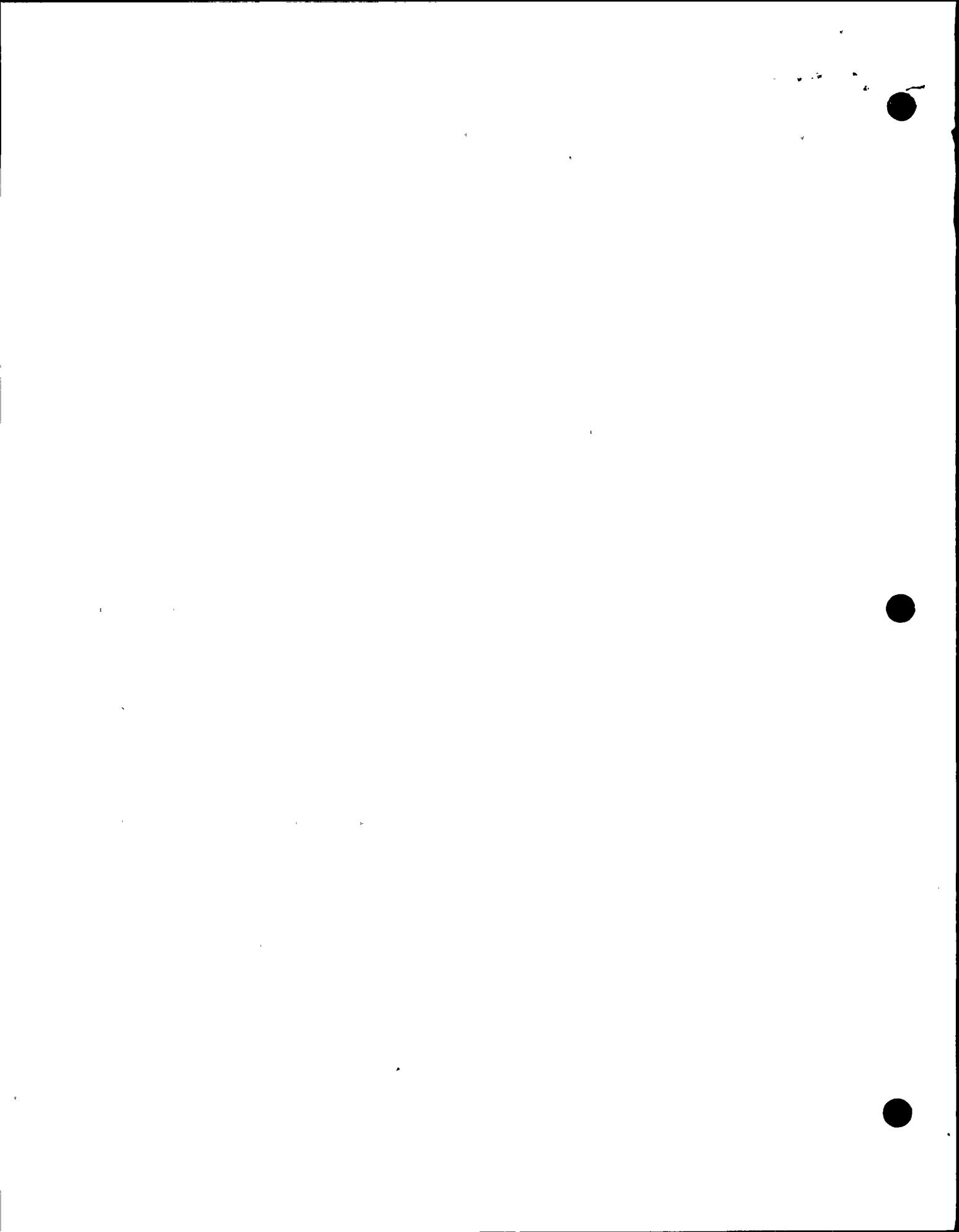
The program does not require management measures which provide that the individual assigned the responsibility for checking, auditing, inspecting or verifying that an activity has been correctly performed be independent of the individual directly responsible for performing the specific activity.

2. Appendix B, 10 CFR 50, Criterion II, "Quality Assurance Program" states in part: "The applicant shall identify the structures, systems and components to be covered by the Quality Assurance Program . . . The program shall provide for indoctrination and training of personnel performing activities affecting quality. . . . The applicant shall regularly review the status and adequacy of the . . . program."

The program does not identify all the structures, systems, and components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The program does not provide for the regular review of the status and adequacy of the Quality Assurance Program.

3. Appendix B, 10 CFR 50, Criterion V, "Instruction, Procedures and Drawings" states in part: "Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities had been satisfactorily accomplished."

The program does not provide provision for quantitative or qualitative acceptance criteria, for determining that important activities had been satisfactorily accomplished.



4. Appendix B, 10 CFR 50, Criterion VII, "Control of Purchased Material, Equipment, and Services" states in part: "Documentary evidence that material and equipment conform to the procurement requirement shall be available at the nuclear power plant site prior to installation and use of such material and equipment . . . and shall be sufficient to identify the specific . . . codes, standards, or specifications, . . . "

The program does not provide for inclusion of appropriate quantitative or qualitative acceptance criteria, for determining that important activities have been satisfactorily accomplished.

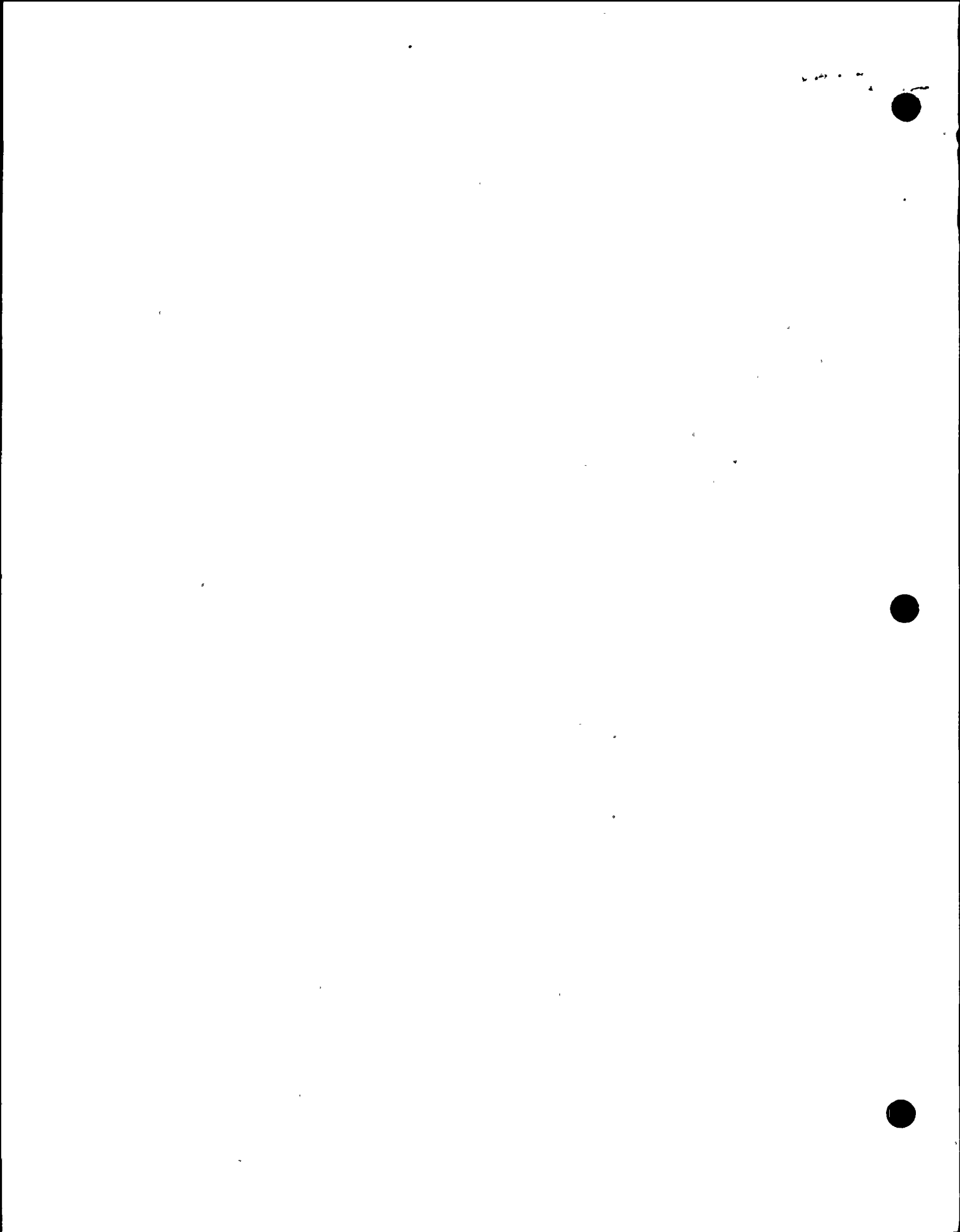
5. Appendix B, 10 CFR 50, Criterion X, "Inspections" states in part: ". . . inspection shall be performed by individuals other than those on the activity being inspected. Examination, measurements, or tests . . . shall be performed for each work operation where necessary to assure quality."

The program does not require that inspections be performed by individuals other than those who performed the activity being inspected nor does it require that any examinations, measurements, or tests of materials or products processed be performed for each work operation where necessary to insure quality.

6. Appendix B, 10 CFR 50, Criterion XI, "Test Control" states in part: "A test program shall be established to assure that all testing required to demonstrate the structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written procedures which incorporate the requirements and acceptance limits contained in the applicable design documents."

The program does not contain procedures which assure that all testing required to demonstrate the structures, systems and components will perform satisfactorily in service is identified and performed in accordance with written procedures.

7. Appendix B, 10 CFR 50, Criterion XVI, "Corrective Action" states in part: "Measures shall be established to assure that . . . failures, malfunctions, . . . are promptly identified and corrected . . . (.) The identification of the significant conditions adverse to quality, the cause of the condition and the corrective action shall be documented and reported to appropriate levels of management."



The program does not establish measures that assure that failures and malfunctions are promptly identified and corrected, nor does it require that for any significant condition adverse of quality the cause of the condition and the corrective action taken are documented and reported to appropriate levels of management.

8. Appendix B, 10 CFR 50, Criterion XVII, "Quality Assurance Records" stated in part: ". . . records shall include . . . the qualification, of personnel, procedures and equipment. Inspection and test records shall . . . identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in correction of any deficiencies noted."

The program does not require that the records include qualification of personnel, procedures and equipment, nor does it require that inspection and test records identify the inspector or data recorder, the type of observations, the results, the acceptability and the action taken in connection with any deficiencies noted.

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