

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

REACTOR FACILITIES BRANCH  
FILE COPY

OCT 23 1975

Niagara Mohawk Power Corporation  
Attention: Mr. R. R. Schneider  
Vice President  
Electric Operations  
300 Erie Boulevard West  
Syracuse, New York 13202

License No. DPR-63  
Inspection No. 75-19  
Docket No. 50-220

Gentlemen:

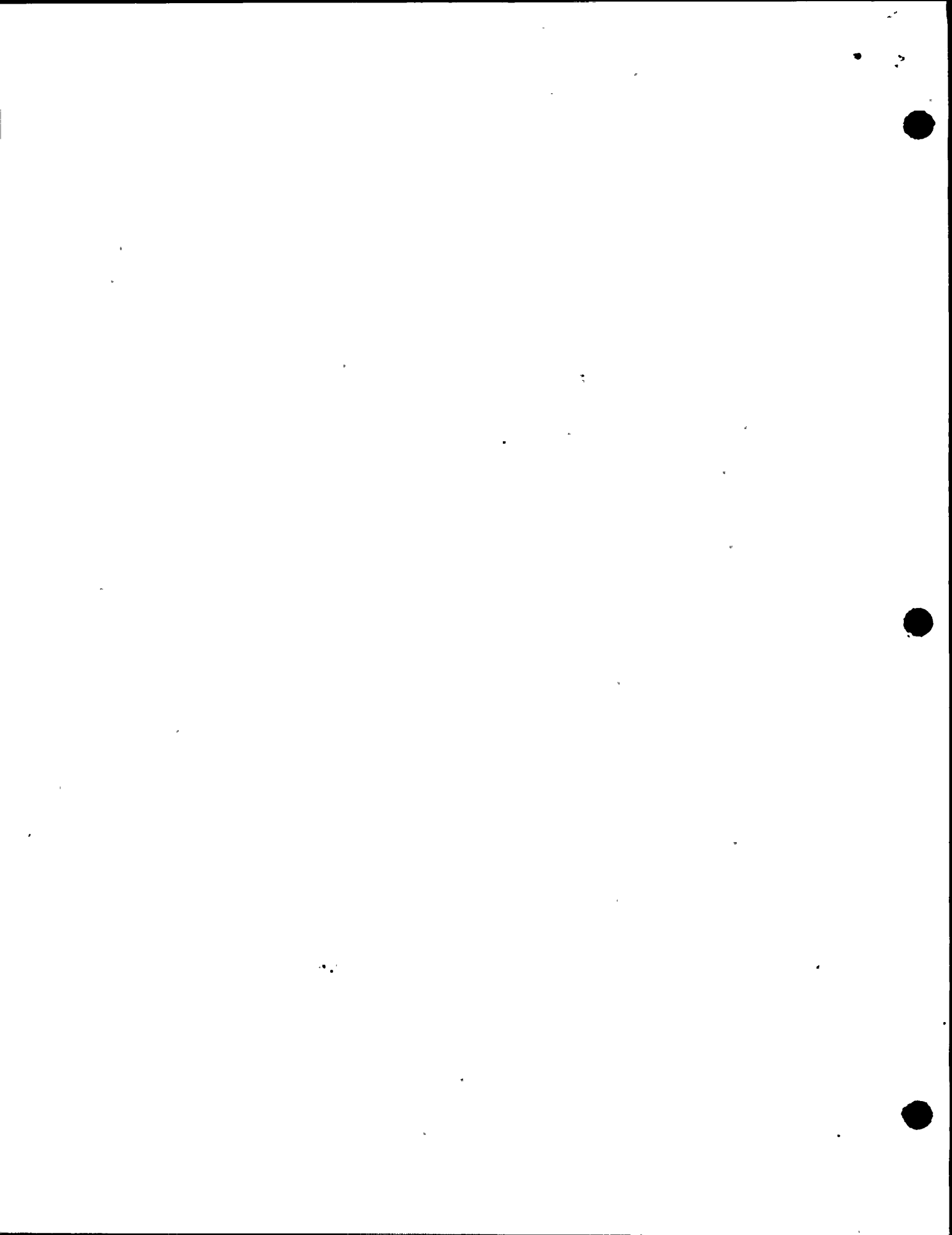
This refers to the inspection conducted by Mr. T. Shedlosky of this office on September 22-26, 1975 at the Nine Mile Point Unit 1 Nuclear Station, Scriba, New York of activities authorized by NRC License No. DPR-63 and to the discussions of our findings held by Mr. T. Shedlosky with Mr. Lempges and others of your staff at the conclusion of the inspection and to a subsequent telephone discussion between Mr. Perkins of your staff and Messrs. W. Baunack, T. Shedlosky and T. Martin of this office on October 21, 1975.

Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector.

Based on the results of this inspection, it appears that one of your activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. This item of noncompliance has been categorized into the levels as described in our correspondence to you dated December 31, 1974. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. With your response include a copy of your surveillance test data and evaluations of control rod drive performance for events occurring on June 29-30, 1974, October 13, 1974, December 21, 1974 and February 11, 1974. This data will be returned to you following our review.



A handwritten signature in dark ink, appearing to be a stylized name, located at the bottom right of the page.



In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

  
Eldon J. Brunner, Chief  
Reactor Operations Branch

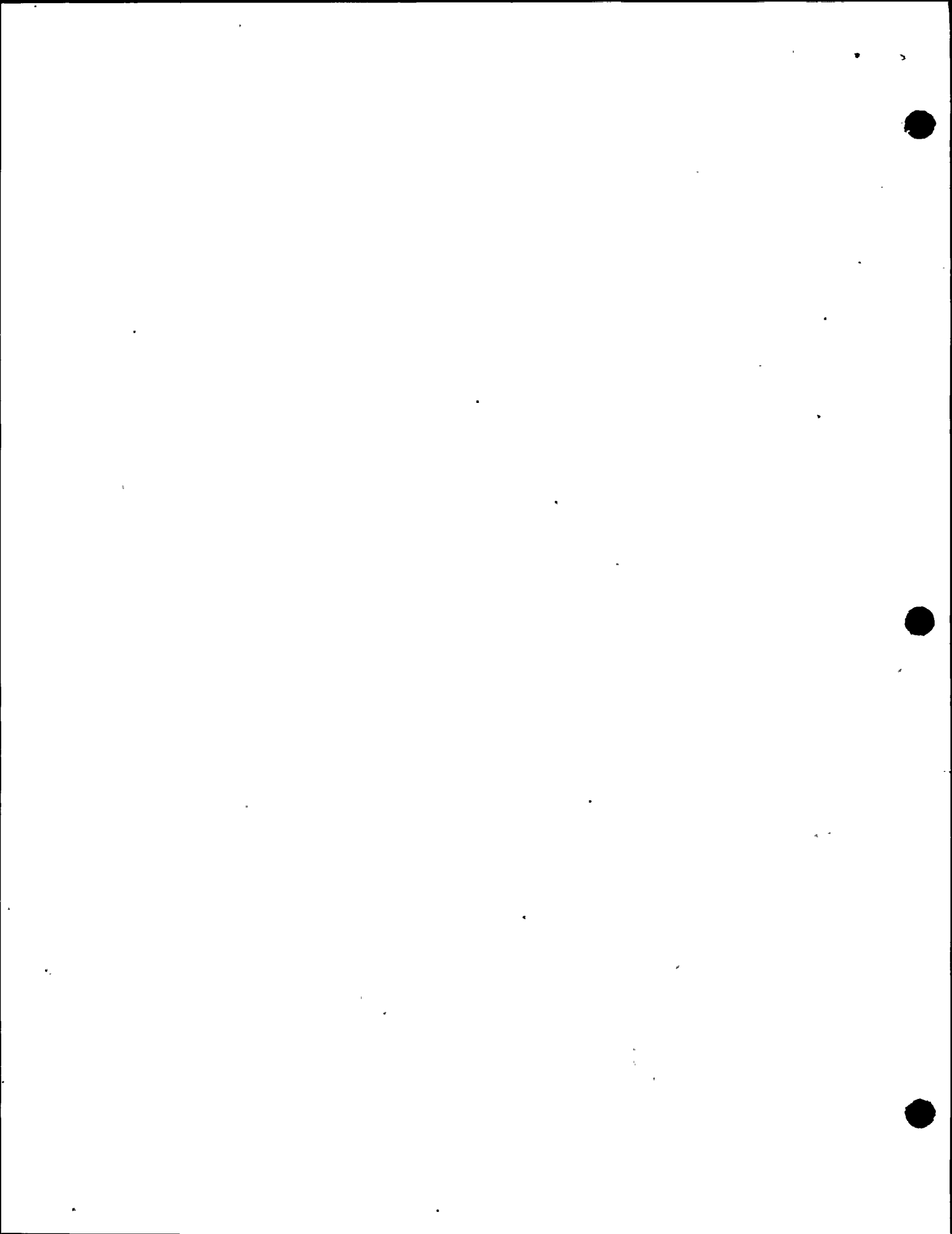
Enclosures:

1. Appendix A, Notice of Violation
2. IE:I Inspection Report No. 50-220/75-19

cc: T. E. Lempges, General Superintendent, Nuclear Generation  
T. J. Perkins, Plant Superintendent  
C. L. Stuart, Operations Supervisor  
E. B. Thomas, Jr., Esquire  
A. Z. Roisman, Counsel for Citizens Committee for  
Protection of the Environment (Without Report)

bcc:

IE Mail & Files (For Appropriate Distribution)  
PDR  
Local PDR  
NSIC  
TIC  
REG:I Reading Room  
Region Directors (II, III, IV) (Report Only)  
State of New York  
A. Z. Roisman, Counsel for Citizens Committee for  
Protection of the Environment



APPENDIX A

NOTICE OF VIOLATION

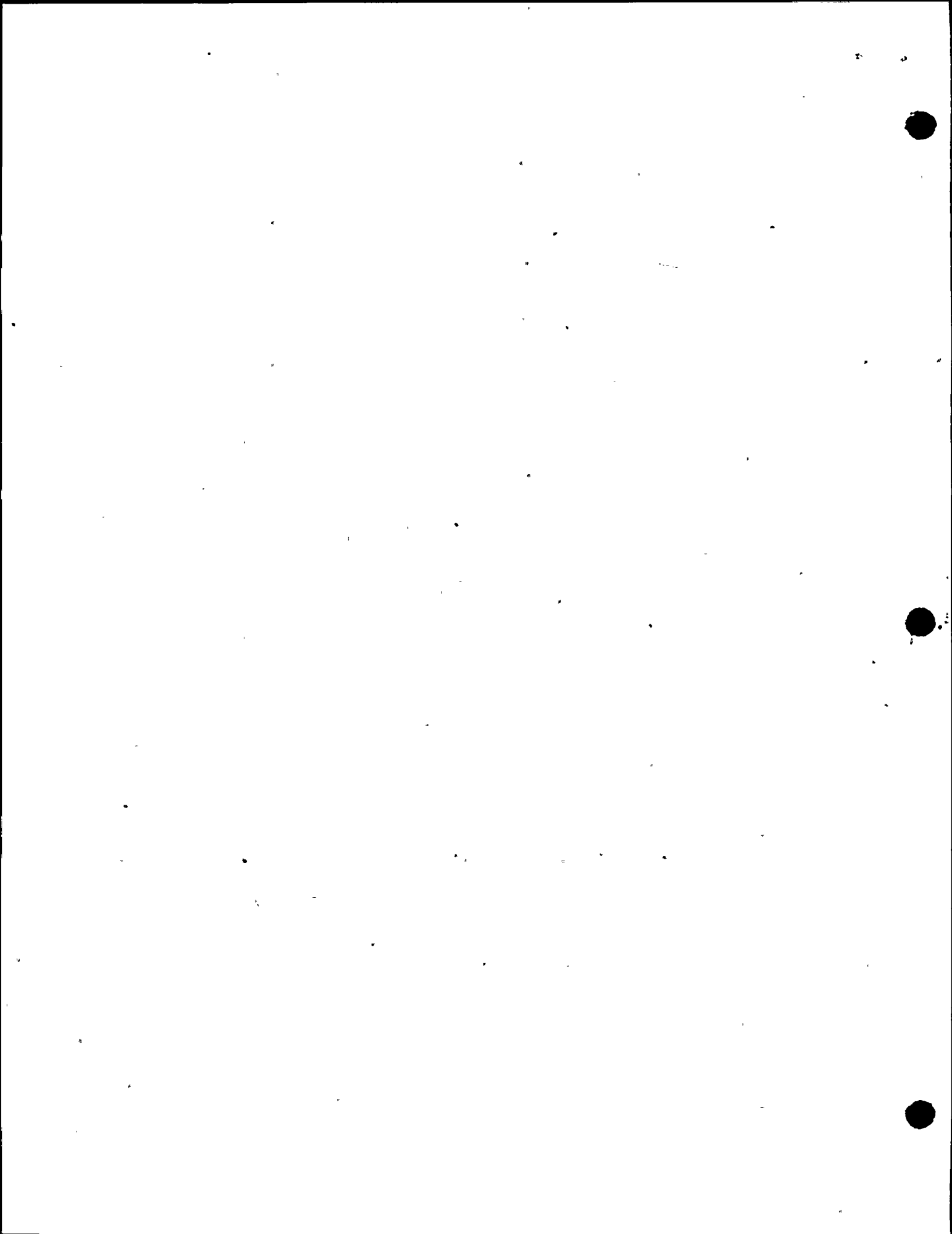
Niagara Mohawk Power Corporation  
Docket No. 50-220  
License No. DPR-63

Based on the results of the NRC inspection conducted on September 22-26, 1975, it appears that one of your activities was not conducted in full compliance with the conditions of your license as indicated below:

Contrary to Technical Specification 6.8.1, which requires that written procedures and administrative policies be established and implemented, Administrative Procedure AP-16A, "Placement of Jumpers/Blocks or Lifted Leads" had not been implemented to control those items.

This item is a Deficiency.

Other deficiencies identified through your internal management control system, which were reported in a timely manner and corrected, are set out in the attached report. No additional information is needed for these items at this time.



U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT  
REGION I

Inspection Report No: 50-220/75-19

Docket No: 50-220

Licensee: Niagara Mohawk Power Corporation

License No: DPR-63

300 Erie Boulevard, West

Priority: \_\_\_\_\_

Syracuse, New York 13202

Category: C

Safeguards Group: \_\_\_\_\_

Location: Nine Mile Point 1 Nuclear Station, Scriba, New York

Type of Licensee: BWR, 1850 Mwt (GE)

Type of Inspection: Routine, Unannounced

Dates of Inspection: September 22-26, 1975

Dates of Previous Inspection: September 15-18, 1975

Reporting Inspector: *J. T. Shedlosky*  
J. T. Shedlosky, Reactor Inspector

10/12/75  
DATE

Accompanying Inspectors: *D. L. Caphton*  
D. L. Caphton, Chief, BWR Projects Section

10/12/75  
DATE

*S. Ramos*  
S. Ramos, Reactor Inspector

10/12/75  
DATE

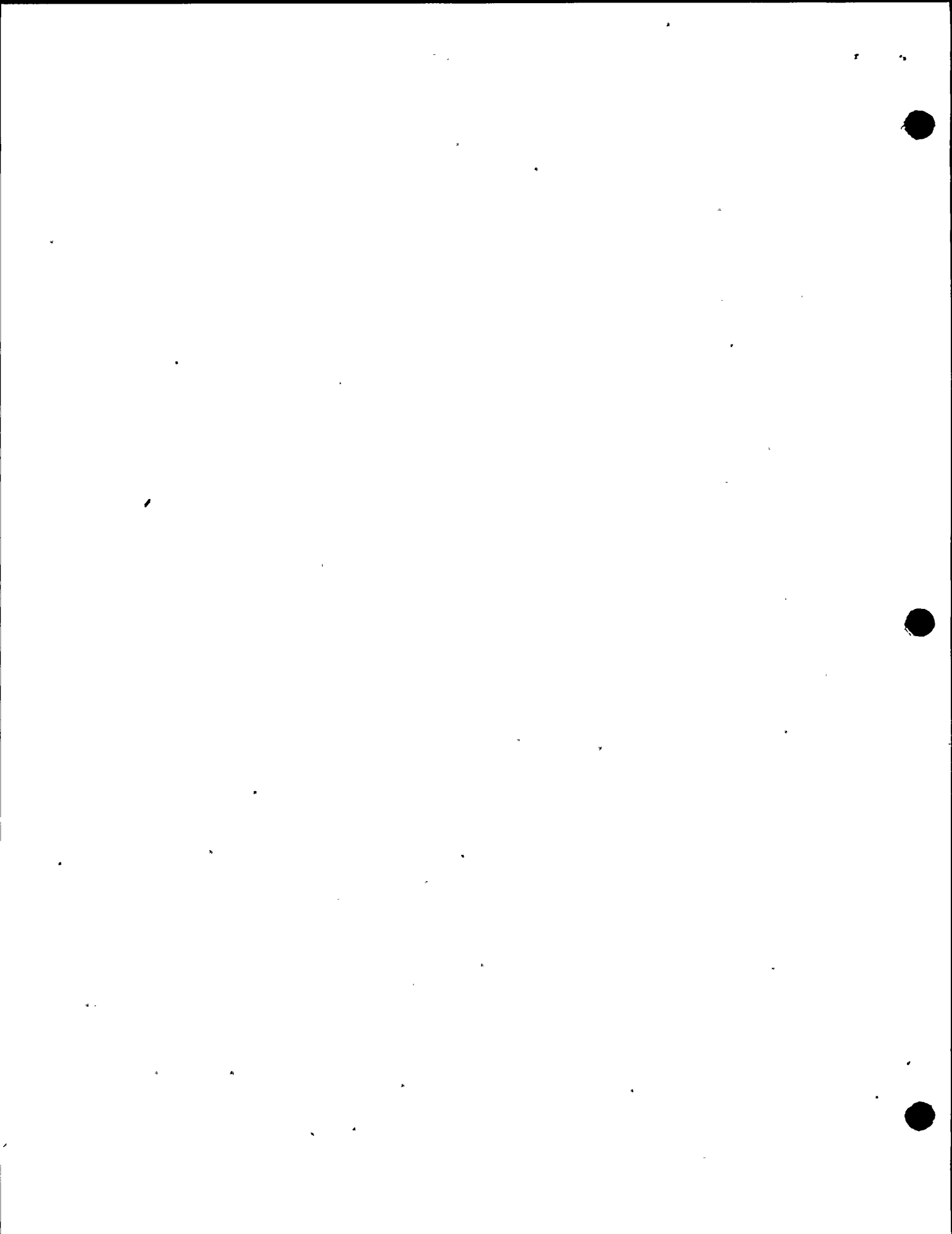
DATE

Other Accompanying Personnel: \_\_\_\_\_

DATE

Reviewed By: *D. L. Caphton*  
D. L. Caphton, Chief, BWR Projects Section

10/12/75  
DATE





SUMMARY OF FINDINGS

Enforcement Action

A. Items of Noncompliance

1. Violations

None

2. Infractions

None

3. Deficiencies

Contrary to Technical Specification 6.8.1, which requires that written procedures and administrative policies be established and implemented, Administrative Procedure AP-16A, "Placement of Jumpers/Blocks or Lifted Leads" had not been implemented to control those items.

B. Deviations

None

Licensee Action on Previously Identified Enforcement Items

Not inspected

Design Changes

None identified

Unusual Occurrences

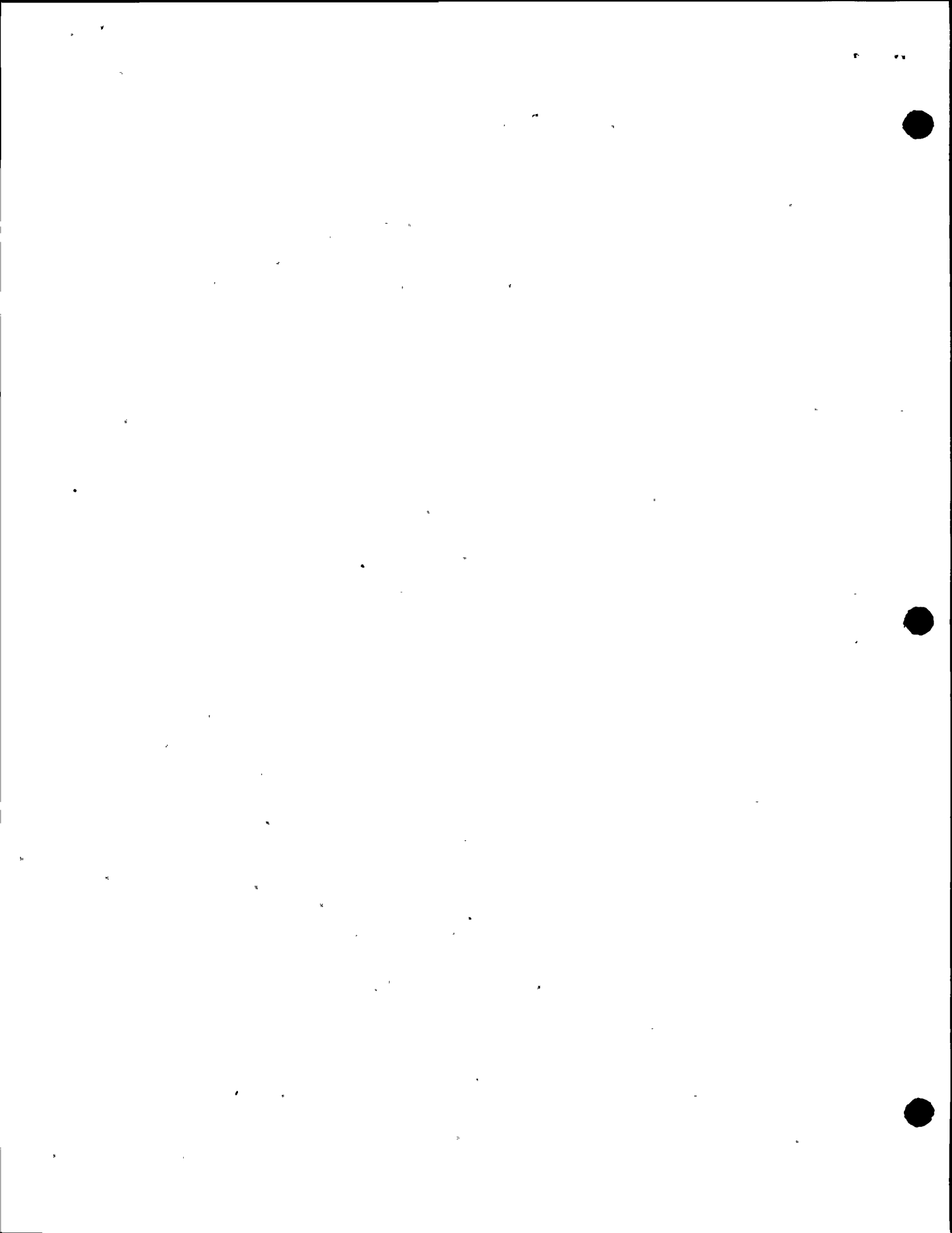
Not inspected

Other Significant Findings

A. Current Findings

1. Acceptable Areas

(These are areas which were inspected on a sampling basis and did not involve an Item of Noncompliance, Deviation or an Unresolved Item.)



75-19-1 Radiation protection controls - "Self Monitoring" practices at radiation protection control points and the Administration Building Portal monitor did not meet reasonable standards for an individual to detect contamination. (Detail 2.b)

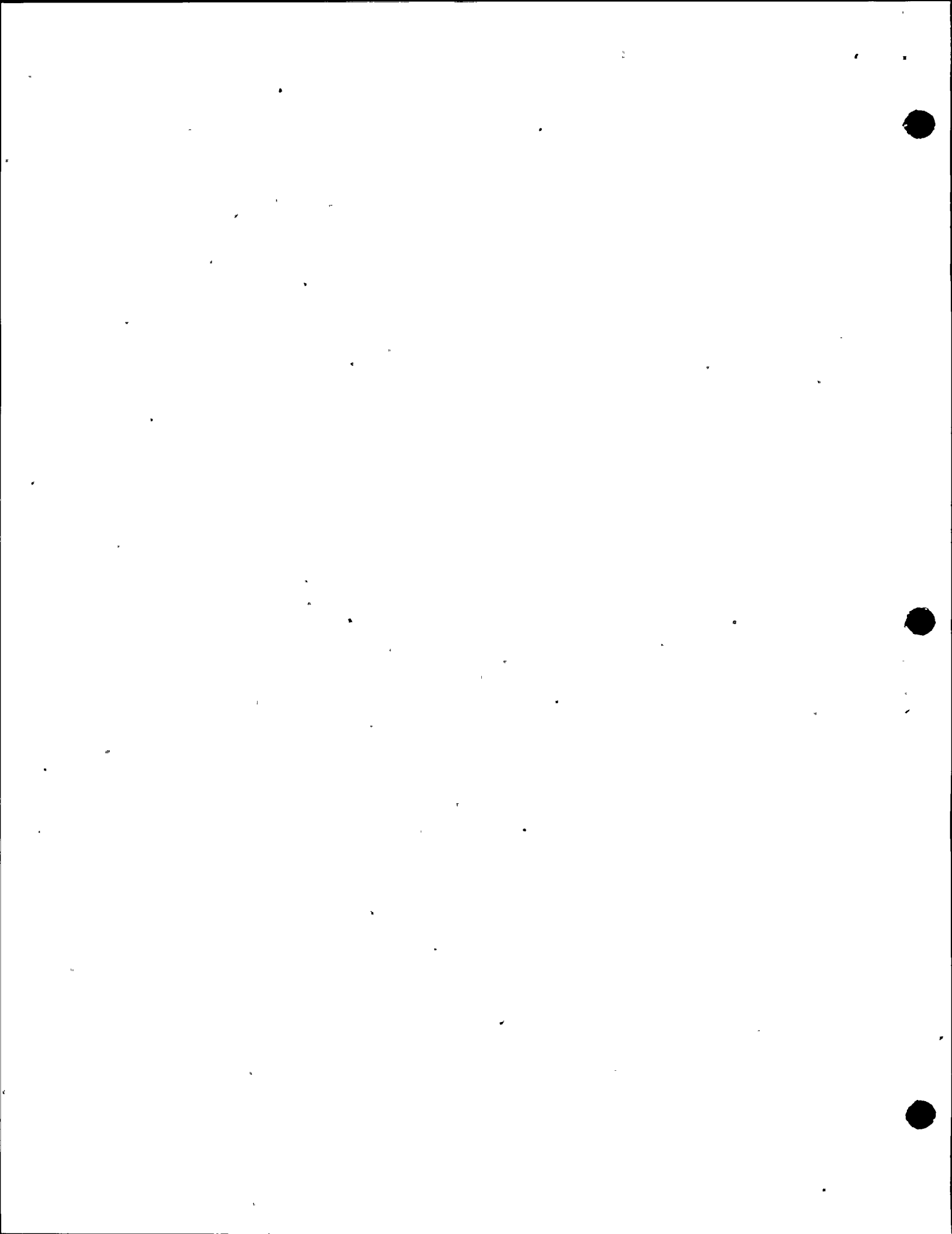
75-19-2 Mechanical Blocking - Possible damage to contacts in safety related instruments caused by mechanically blocking contacts. (Detail 4.c)

75-19-3 Surveillance Testing - Refueling Interlocks Procedure needs to be approved prior to refueling. (Detail 4.d)

75-19-4 Occurrence Reports - Reports have not yet received a review by the QC organization. (Detail 7)

5. Deficiencies Identified by the Licensee

- a. Contrary to Technical Specification 3.6.2.a - Primary containment high pressure instruments were found with setpoints beyond Technical Specifications allowed values on two occasions. (NMPC reports to Region I dated June 2 and July 1, 1975, Subject: AO 75-12 and 75-17.)
- b. Contrary to Technical Specification 3.6.2.f - Reactor low-low-low water level instruments were found with setpoints beyond Technical Specification allowed values on two occasions. (NMPC reports to Region I dated June 3 and July 1, 1975, Subject: AO 75-13 and 75-16.)
- c. Contrary to Technical Specification 4.3.6.c(1) - Quarterly surveillance testing did not include a calibration check of pressure suppression chamber - reactor building vacuum breaker instrumentation. (NMPC report to Region I dated August 4, 1975, Subject: AO 75-19.)
- d. Contrary to Environmental Technical Specification 3.2.c - Milk samples were not analyzed for Iodine 131 within the required confidence limits. (NMPC report to Region I dated September 3, 1975, Subject: AP 75-23.)



### Management Interview

A management interview was conducted on September 26, 1975 with Mr. T. E. Lempges, General Superintendent - Nuclear Generation, Mr. T. J. Perkins, Station Superintendent, Mr. W. M. Bryant, Supervisor, Quality Control, Operations, and Mr. R. Norrix. Items discussed are summarized below:

#### A. General

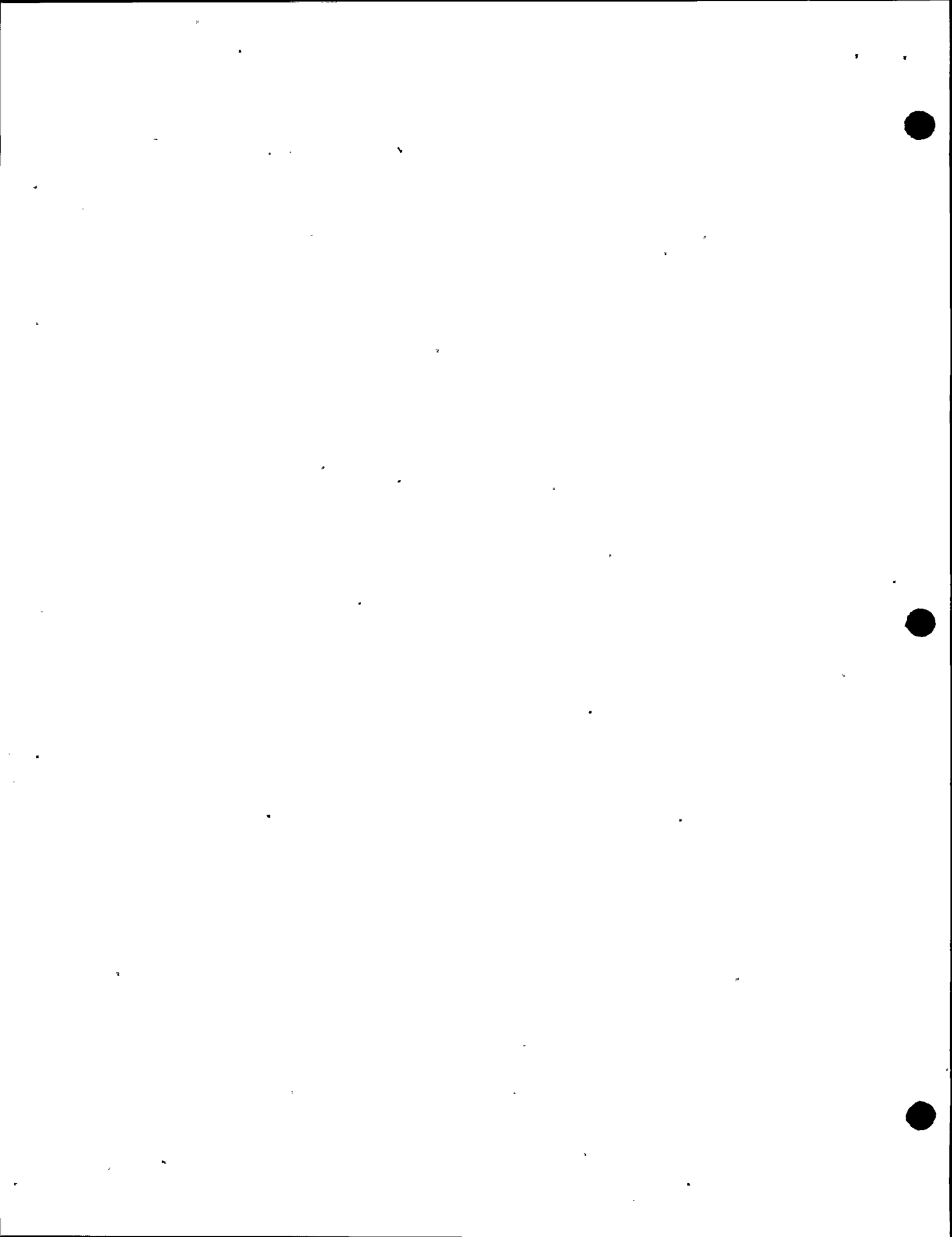
The inspectors summarized the scope of the routine inspection relative to a review of plant operations, logs and records, a facility tour and surveillance testing prior to refueling operations. A review of Abnormal Occurrences reported since the last inspection and a review of the licensee's Abnormal Occurrence Review systems were also conducted.

#### B. Inspection Findings

The items listed above under Items of Noncompliance, Unresolved Items and Follow-up Items were identified and discussed.

The inspector noted that the surveillance procedures reviewed in the areas of Chemistry, and Instrument and Control had been revised. The procedures and the records of completed testing selected met the requirements of ANSI N18.7 - 1972 and AP-17A. However, those selected records and procedures concerning testing by Operations and Reactor Engineering indicated that a significant amount of work remains to meet the licensee's commitment to ANSI N18.7 - 1972.

Licensee representatives stated that they were confident that test data was available and was within specifications for those items described in Detail 4.a and b. The inspectors agreed to consider these items as unresolved and review that data during future inspections.



## DETAILS

### 1. Persons Contacted

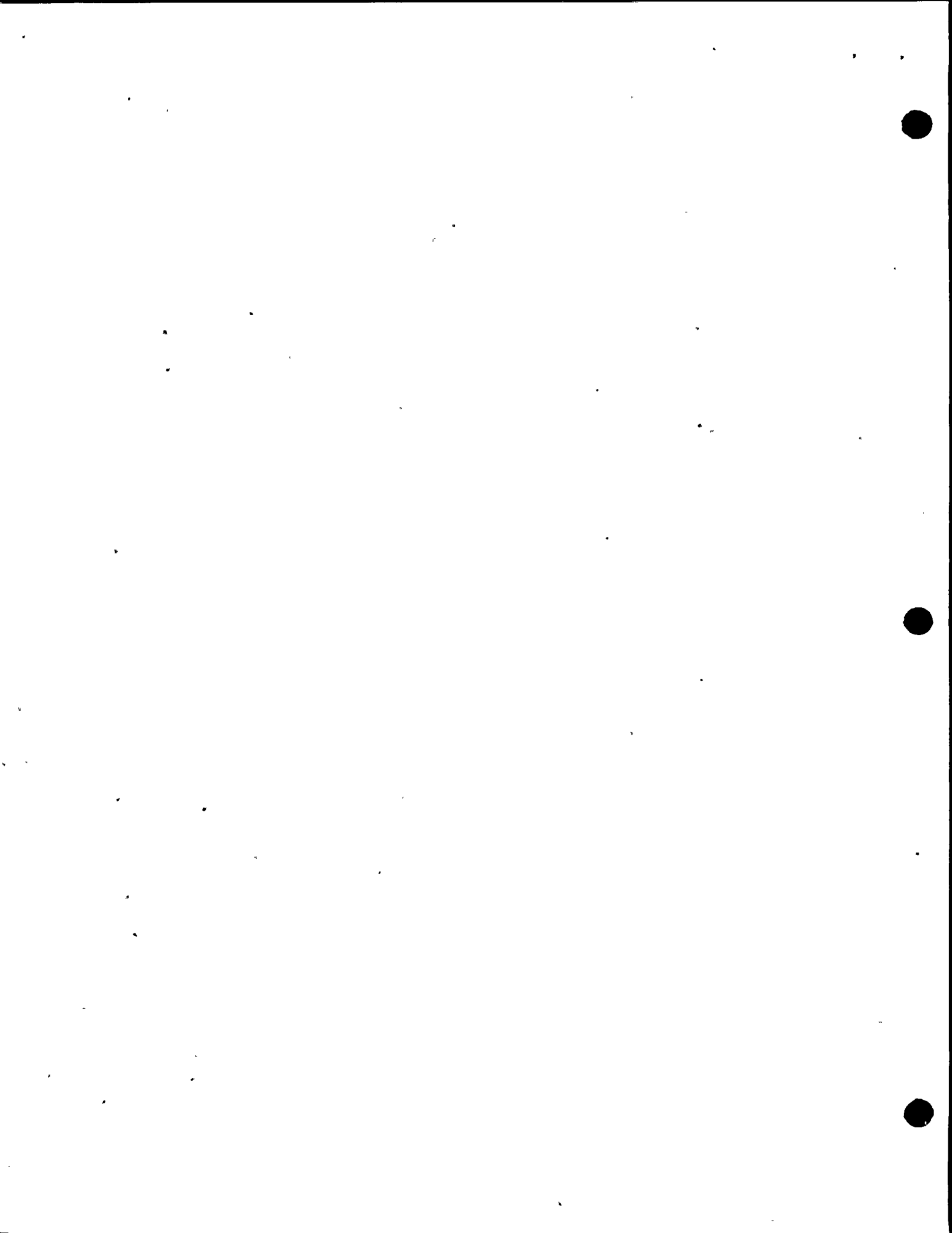
Mr. T. E. Lempges, General Superintendent - Nuclear Generation  
Mr. T. J. Perkins, Station Superintendent  
Mr. C. L. Stuart, Jr., Operations Supervisor  
Mr. J. C. Aldrich, Training Supervisor  
Mr. R. Baker, Maintenance Supervisor  
Mr. R. A. Burns, Radiochemistry and Radiation Protection Supervisor  
Mr. T. J. Dente, Reactor Analyst Supervisor  
Mr. J. J. Shea, Station Shift Supervisor  
Mr. F. C. Lilly, Station Shift Supervisor  
Mr. V. AuClair, Shift Operating Foreman  
Mr. S. Damago, Nuclear Auxiliary Operator  
Mr. B. Taylor, Assistant Instrument and Control Supervisor  
Mr. J. Duell, Assistant Radiochemistry and Radiation Protection Supervisor  
Mr. R. Tessier, Reactor Analyst Technician

### 2. Facility Tour

A tour was conducted of accessible areas of the reactor and turbine building. The following observations were made:

- a. Instrumentation - The inspector noted that the process instrumentation monitoring the SLC system indicated within technical specification allowed values.
- b. Radiation protection controls - The inspector noted general conformance with established radiation protection controls. However, several areas in the turbine and reactor buildings were posted as being surface contaminated. Several were without the step off pads and containers for discarded protective clothing.

The inspectors observed the "self-monitoring" practices at the control point at the exit from the Turbine Building to the Administration Building (rad protection office and locker room). About 60% of the people passing through that point did not take proper care in performance of that monitoring in that:





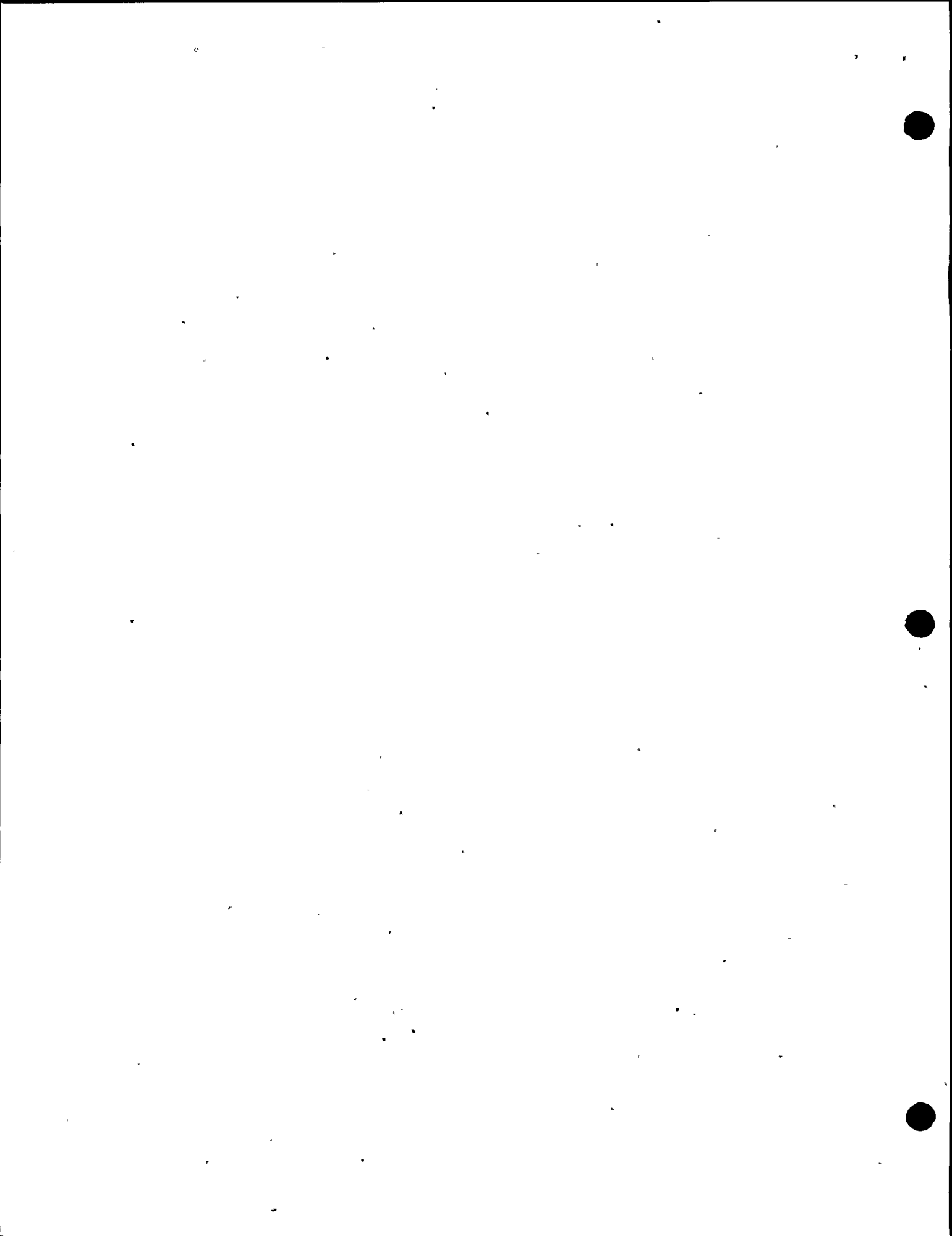
- (1) hands were not checked prior to picking up the probe,
- (2) surveys consisted only of a quick survey of the bottoms of shoes.

These observations were discussed with plant management. Actions taken included additional instructions to supervisors concerning the care taken during "self-monitoring" and instructions to radiation protection personnel to monitor activities at check points more closely.

- c. Plant housekeeping - The inspector did not identify housekeeping conditions which may have constituted a fire hazard.
- d. Fluid leaks - No significant fluid leaks were noted during the plant tours.
- e. System lineups - The inspector verified the lineup of the SLC system per Technical Specification and Operating Procedure 12.
- f. Control Room annunciators - The status of annunciators was discussed with shift personnel, who were knowledgeable as to their condition.
- g. Control Room manning was verified to be in conformance with the Technical Specifications.

### 3. Log Review

- a. Station Shift Supervisor and Shift Operating Foreman logs were reviewed for the selected period of August 24, 1975 through September 13, 1975 (Books #138, 139, and 148, 149, 150 respectively). These logs were reviewed per the requirements of the Technical Specifications and Administrative Procedure.
- b. Jumper Log - The "Electrical Jumper Log" was reviewed for the period of March 8, 1975 through September 23, 1975. The log was being maintained per the superseded "Standing Order for placement of Jumpers/Blocks or Lifted Leads." The requirements



of Administrative Procedure AP-16A "Placement of Jumpers/ Blocks or Lifted Leads" has not been implemented. The present records do not identify the persons approving the placement of a jumper or lifted lead and do not reference the procedure requiring the jumper or lifted lead. A description of the function of the jumper was not always given as relating to loss of equipment protective functions, interlocks and impact on Technical Specification requirements.

- c. Standing Orders - Standing orders for the Site and for Nine Mile Point 1 were reviewed in accordance with the requirements of the Technical Specifications and Administrative Procedure AP-9. Those standing orders in effect which were reviewed were:

NMPSO-1	Load Curtailment
NMPSO-2	Control Room Procedure
NMPSO-3	Shift Security Patrol
NMPSO-4	Patrol Instructions
NMPSO-5	Shift Surveillance Testing
NMPSO-6	Rock Blasting Operations
NMPSO-7	Operation of Track Bay Extension Door D.198
SSO-1	Shift Transition
SSO-2	4 KV Breakers

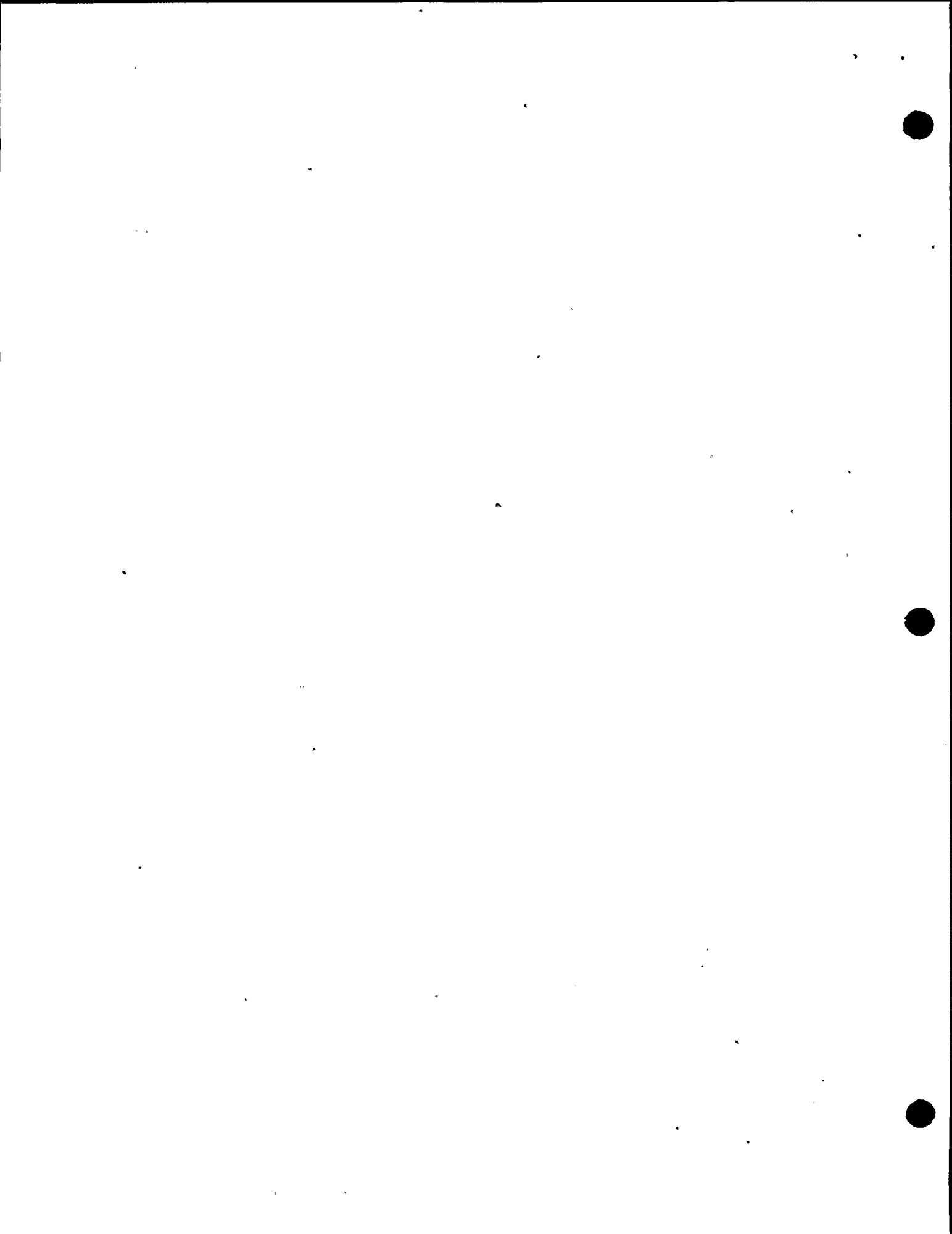
The inspector had no questions concerning these standing orders.

- d. Station Shift Supervisor Instructions - Station Shift Supervisor instructions (Night Orders) were reviewed through September 23, 1975 per the requirements of the Technical Specifications and Administrative Procedure AP-15 "Procedure for Special Orders and Instructions." The inspector had no questions concerning these instructions.
- e. Occurrence Reports - The inspector reviewed occurrence reports through those dated September 13, 1975. None resulted in reportable events which had not been the subject of an Abnormal Occurrence Report.

#### 4. Surveillance Testing

The inspector selected the following limiting conditions for operation and their respective surveillance testing for the purpose of verifying procedural coverage to meet the requirements of the Technical Specifications, ANSI N18.7 - 1972\* and Administrative Procedure AP-17:

\* Report 50-220/75-07 contains a licensee committal for procedural compliance with ANSI N18.7 - 1972 by December 1975.



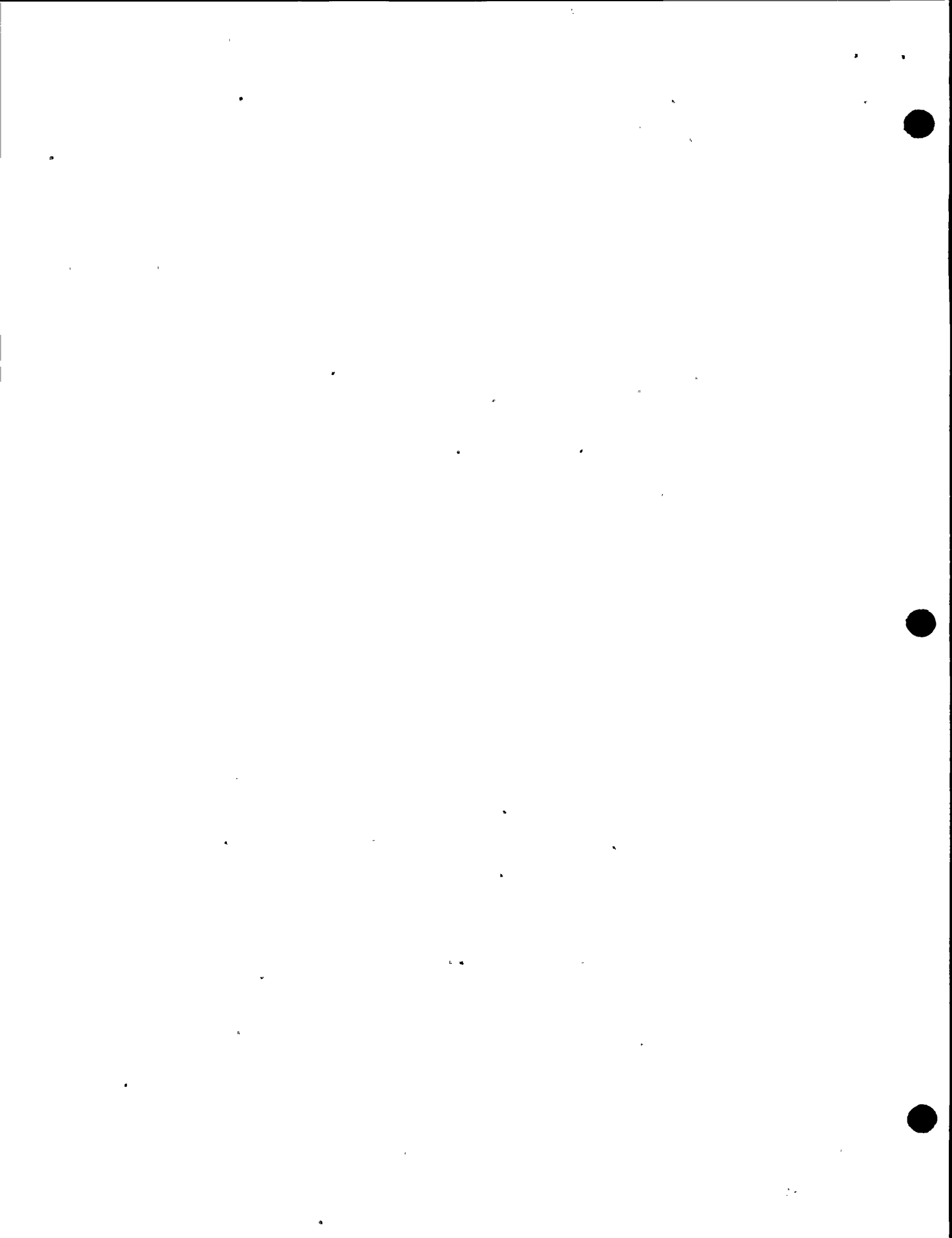
- 3.2.5/4.2.5 Reactor Coolant System Leakage Rate
- 3.2.7/4.2.7.a Reactor Coolant System Isolation Valves
- 3.1.1/4.1.1.c(2) Control Rod Insertion Times (Scram)
- 3.1.2/4.1.2.b Liquid Poison System (Boron Solution Checks)
- 3.6.2.a/4.6.2.a, Table a Item (11) Turbine Stop Valve Closure, Scram
- 3.6.2.a/4.6.2.a, Table a Item (12) Load Rejection, Scram
- 3.5.2/4.5.2 Refueling Platform Interlock
- 3.6.1.b/4.6.1.b Mechanical Vacuum Pump Auto Isolation
- 3.6.3.a/4.6.3.a Emergency Power, EDG Auto Start
- 3.6.3.b/4.6.3.b Emergency Power, EDG Rated Load Test and Battery Testing
- 3.1.3/4.1.3 Emergency Cooling System
- 3.1.4/4.1.4 Core Spray System

The latest revision of approved surveillance test procedures on file and selected test data was reviewed by the inspector. The following items were noted:

a. Timing of Reactor Coolant Isolation Valves 4.2.7.a

This procedure was completed during the last refueling outage under License DPR-17. It has not yet been revised to meet the requirements of ANSI N18.7 - 1972 in that:

- (1) Prerequisites are not complete.
- (2) Return to normal not included.
- (3) Data Sheet steps are not keyed to the procedure body and provide blanks for initials or signatures as required.
- (4) Data Sheet does not sign off data, a sign off sheet is not used.
- (5) There is no certification that the acceptance criteria is satisfied.
- (6) Change made to procedure was not properly approved.
- (7) The procedure does not require testing of the following valves:

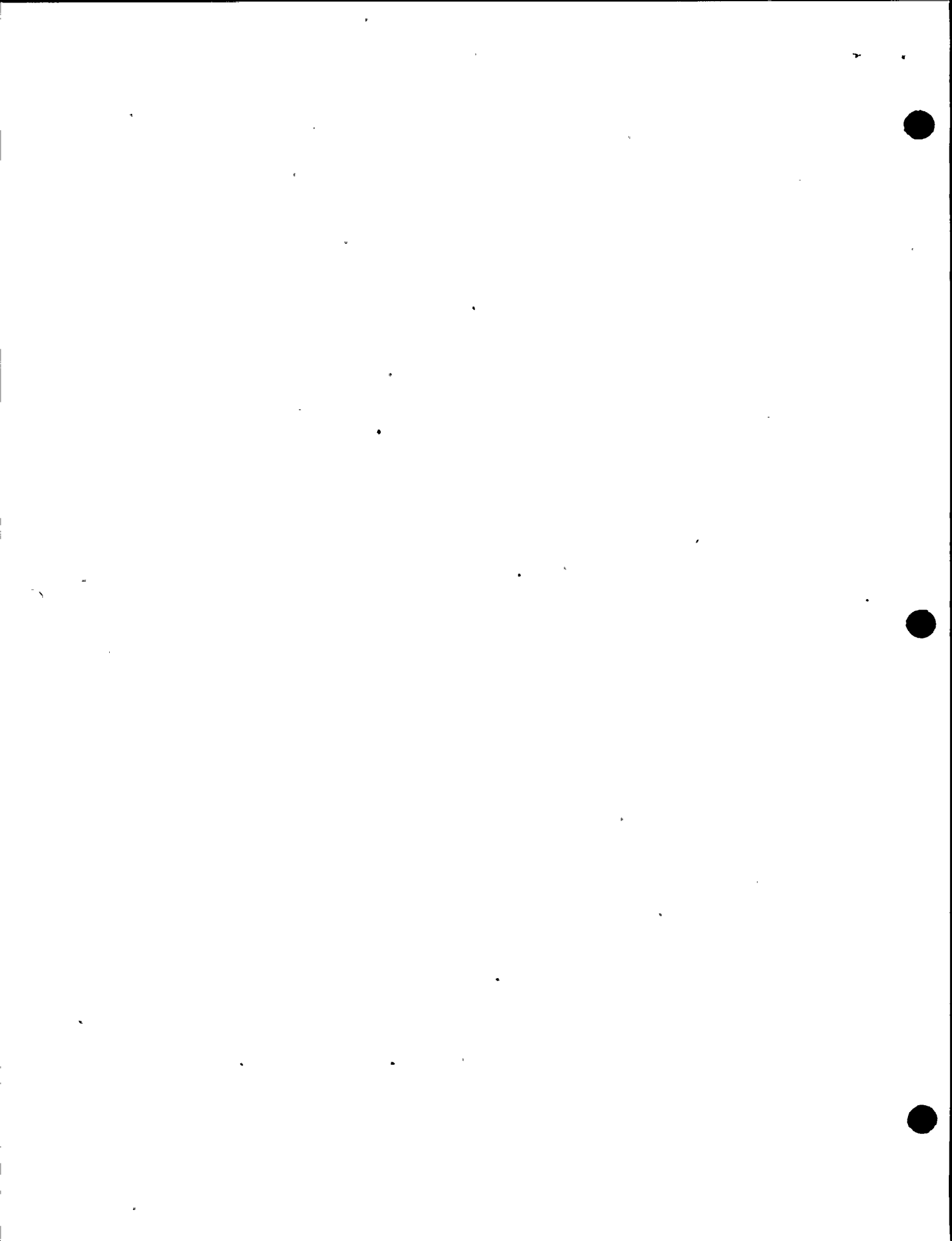


- (a) Main Steam - Emergency Cooling Vents (2 lines, 2 valves per line)
- (b) Emergency Cooling - Steam Leaving Reactor (2 lines, 1 valve per line)

This is an unresolved item. The licensee has committed to comply with ANSI N18.7 - 1972 by December 1975.

b. Control Rod Insertion Times (Scram Insertion)

- (1) Data for this surveillance test was reviewed for time periods covering DPR-17 and DPR-63. The review was conducted in light of requirements and controls in effect at those times. Generally, insertion times could not be verified to have been accomplished because:
  - (a) There is no procedure to cover this requirement.
  - (b) Records are kept for a few of the scrams but only on scratch paper.
  - (c) Review of SCRAM Reports reveals that although there is a place to certify requirements have been met, it is missing from reports dated 6/29/74\*, 10/12/74\*, 12/9/74\*, 12/24/74\*, 1/12/75, 1/18/75 and 2/3/75.
  - (d) Review of the Short form Pre Startup Checklist reveals the foregoing certification missing or inconsistencies as follows:
    - 1. 7/27/75 Scram Report certified insertion times, however, Pre Startup Checklist stated it was not applicable.
    - 2. 1/12/75 Checklist noted "Branch Recorder Operated" but not data as being satisfactory.
    - 3. 7/1/74\*, 6/30/74\*, and 6/28/74\* do not list certification.
- (e) Results of SCRAM INSERTION TEST - June 29-30, 1974\* indicated that 5 rods exceeded the 50% max insertion times. Available records could not provide assurance that control rods within nine rod square arrays around these rods met the conditions for operation.





(f) Evaluations were not available to provide an analysis of the following occurrences:

<u>Scram Insert Data</u>	<u>Comments</u>
10/13/74*	Eight rod mean 90% rod insertion time exceeded the range of 2.4-3.1 sec. - average = 2.339.
12/21/74*	Eight rod mean 90% rod insertion time exceeded the range of 2.4-3.1 sec. - average = 3.70.  1 rod (not numbered) exceeded 50% maximum insert time of 2.12 seconds.  20 of 27 rods exceeded the single rod range of 1.9-3.6 seconds.
2/11/75	Rod 34-51 on data sheet states the reading is bad; however, information in reactor physics log indicates problems with a value and noted it took 2.5 sec. prior to any rod motion.

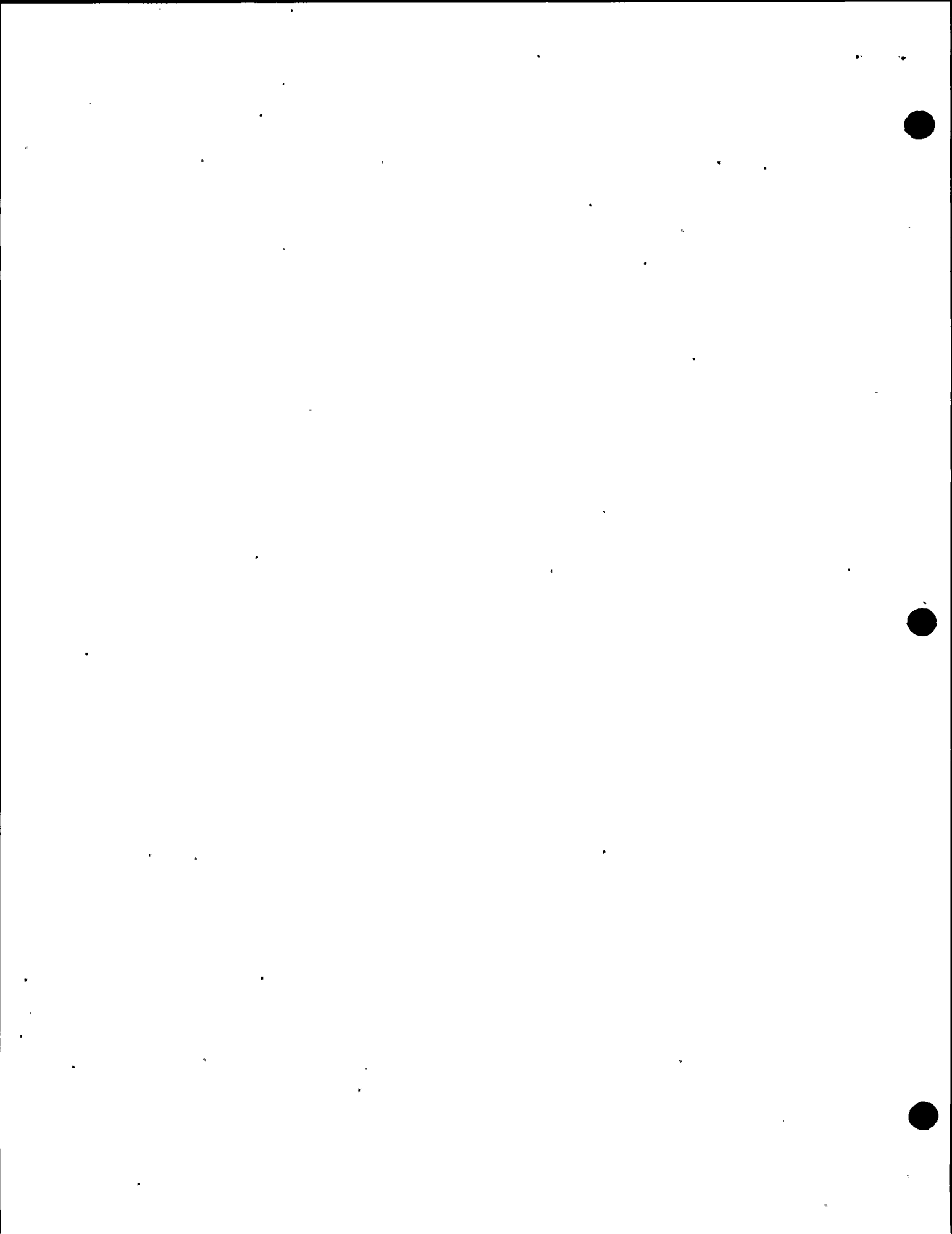
This is an unresolved item and will be followed up on during a future inspection.

c. Instrumentation Surveillance of Scram Initiating Instrument

Generator Load Rejection

NI-ISP-IC-23 and 02-13 were reviewed and discussed with licensee. Both procedures require minor modifications to meet Surveillance Test Procedures criteria.

- (1) Instrument Surveillance Procedure - 23 requires that for tests below 45% Reactor Power, the Turbine Anticipatory Trip Bypass Reactor Scram contacts be mechanically blocked open. The inspector pointed out this could possibly damage or cause the instrument trip points to be changed without a recheck or calibration. The licensee stated he would review the procedure to determine the feasibility of conducting the IC-23 tests concurrently with 02-13 so that the devices will operate as designed. The inspector had no other questions.



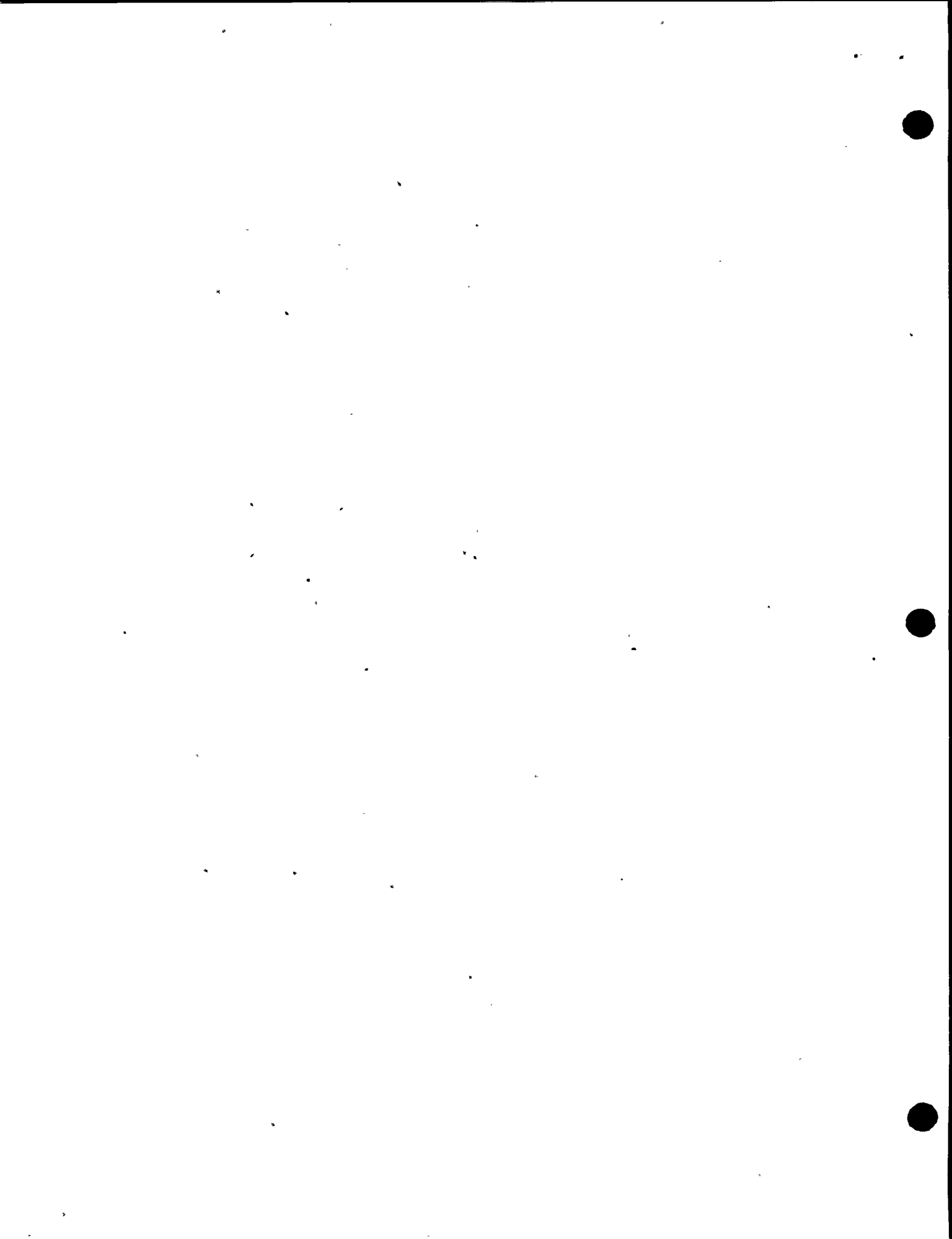
d. Auxiliary System - Testing of the Refueling Platforms Interlock

- (1) At the present time there is no procedure for conducting surveillance tests of the refueling platform interlock. A procedure is required to test the interlock prior to the moving of fuel during the present refueling outage. This is an open item and will be reviewed during subsequent inspections during this refueling.

e. Engineered Safety Features - Emergency Cooling System Heat Removal Capability

- (1) Procedures and data for this surveillance requirement were reviewed. This test was completed during the last refueling outage under License DPR-17. It has not yet been revised to meet the requirements of ANSI N18.7 - 1972, but is required only every five years. Items identified include:
  - (a) Data sheets do not provide for recording of data and for evaluating and reviewing the results, as to meeting acceptance criteria.
  - (b) Data sheets paragraphs are not keyed to the procedure body.
  - (c) Sign off sheets are not used or the sign off data included on the data sheets.
- (2) Records available were raw data and rough computations. There is no evidence the data has been reviewed; however, a review of the data by the inspector with licensee personnel revealed the data is sufficient for a proper review and did meet the acceptance criteria.
- (3) Records did not indicate a refueling outage automatic actuation and functional system testing as being completed during previous (1974) outage\*.

This is an unresolved item to be followed up on in accordance with the licensee's commitment to revise procedures by December, 1975.



5. Review of Nonroutine Event Reports

Licensee Event Reports of Abnormal Occurrences were reviewed through report AOR 75-23 dated September 3. Of these reports the following were inspected: AOR 75-5, 8, 12, 13, 16, 17, 18, 19 and 22. The inspection consisted of verification of the details of the report, and inspection of the corrective action taken, including the required review by safety committees. The circumstances surrounding the occurrence were reviewed to determine if Technical Specification limits were exceeded.

a. Failure of Emergency Ventilation System (75-5).

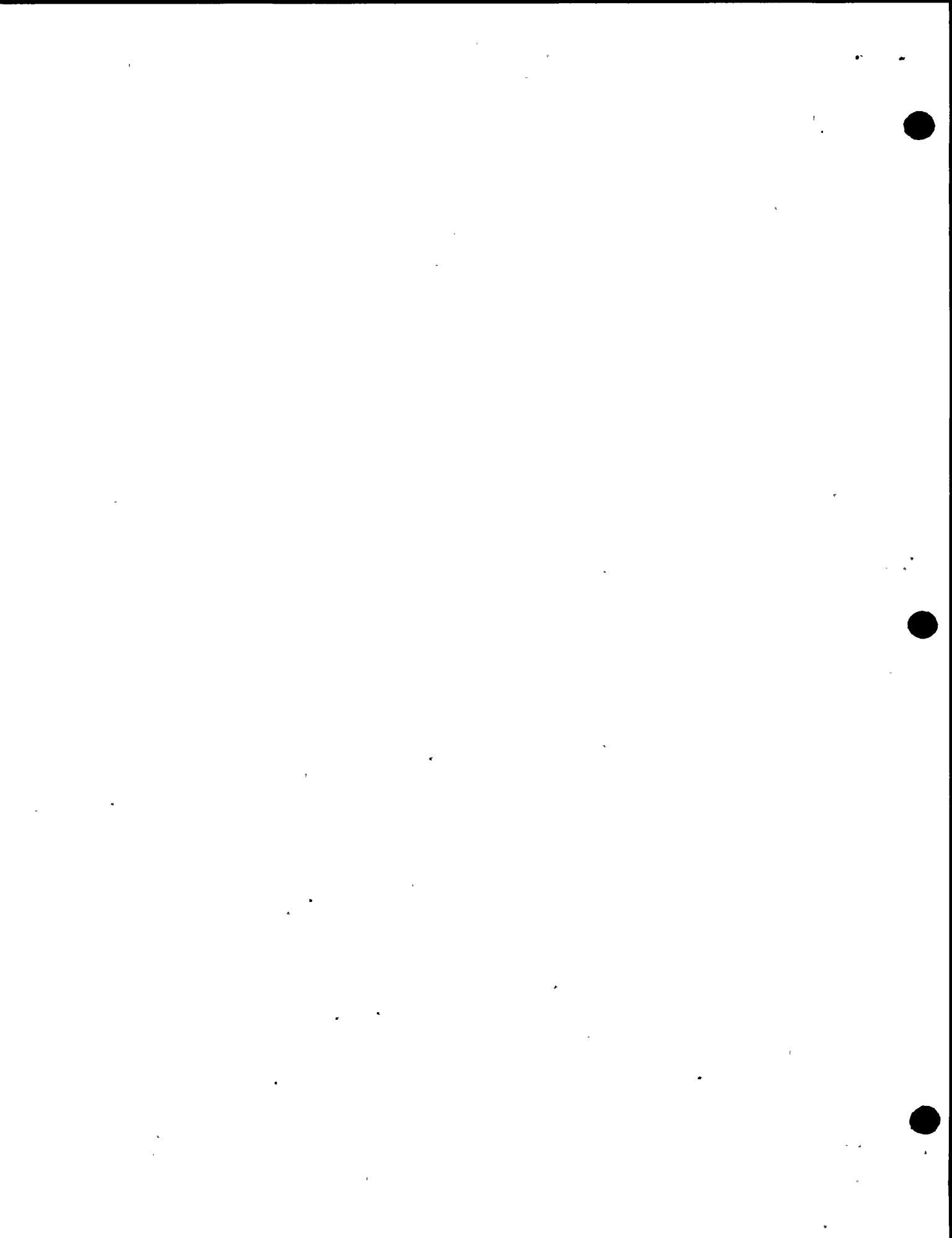
A failure of redundant solinoid operated air valves prevented the operation of the emergency ventilation system common isolation valve. The valve was manually opened. One SOV was found to have a broken stem; the second was filled with metal oxide. Both valves were repaired and the system returned to a standby status. The inspector had no other questions.

b. Turbine Trip RPS Logic (75-8).

Relay 12K30 which is normally energized during reactor operation failed due to a shorted coil. This caused a trip in RPS Channel 12. All components except relay 12K30 operated as required. The licensee considers this failure was expected due to the high usage of the relay coil. The inspector had no other questions.

c. Drywell High Pressure (75-12 and 17).

On two occasions the trip points of drywell high pressure instruments were found beyond the Technical Specification limit of 3.5 psig  $\pm 0.053$  psi. AOR 75-12 reported that instruments A, B and D tripped beyond the limit of 3.553 psig at 3.7 psig. Instruments B and D are in RPS Channel 12 and instrument A is in RPS Channel 11. AOR 75-17 reported that instrument C tripped at 3.7 psig and instrument D tripped at 3.75 psig. Instrument C is in RPS Channel 11 and D is in Channel 12. In both cases the licensee took credit for the protection offered by reactor water level instruments. The inspector had no other questions.



d. Reactor Low Water Level.

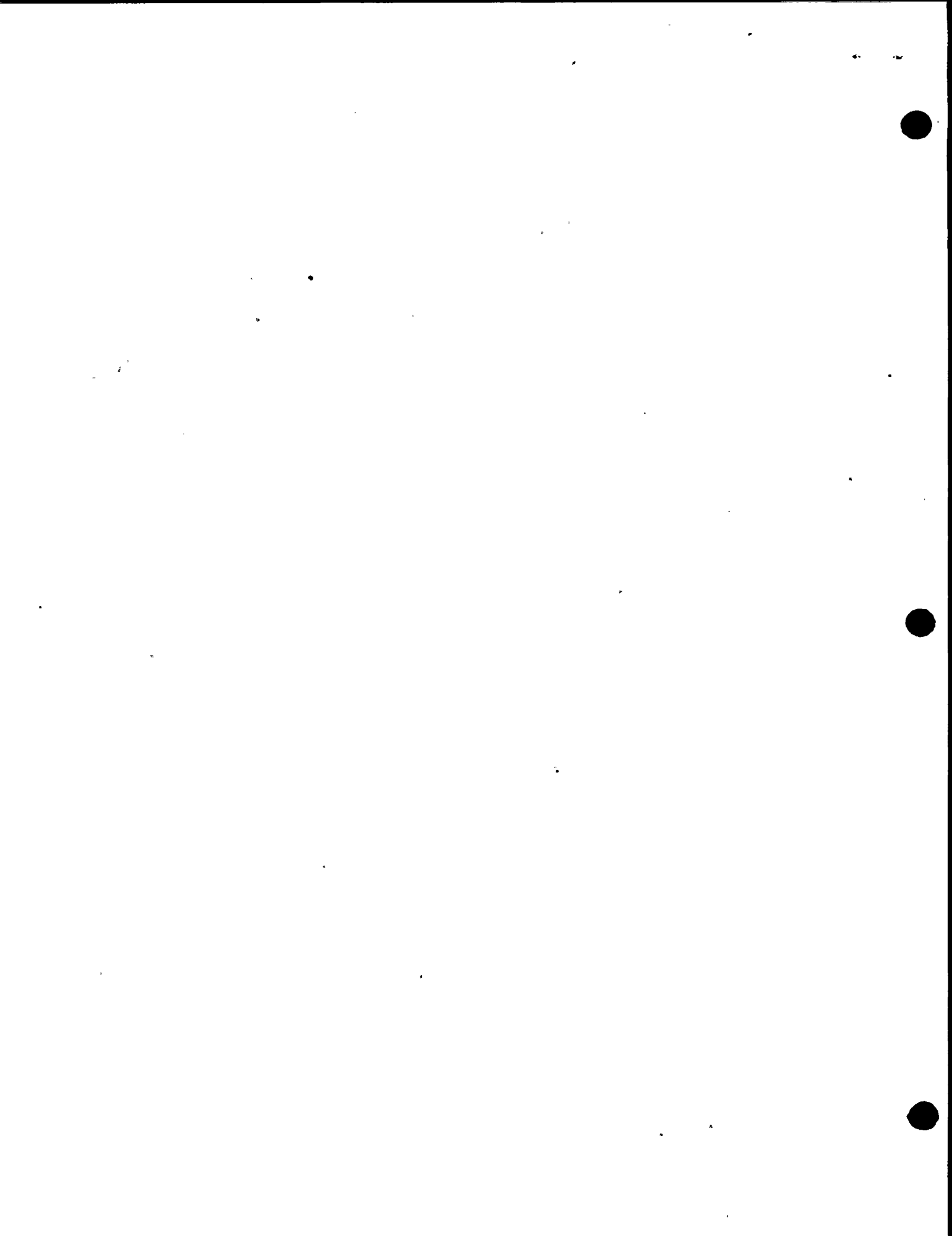
On two occasions the trip points of reactor low-low-low water level instruments were found beyond the Technical Specification limit of 7'11" below minimum normal water level at elevation 302'9",  $\pm 2.6$  inches of water. AOR 75-13 reported the set point drift of instruments D, A and C. These tripped at 124.5", 132" and 124" respectively (based on this instrument zero the required trip is 125.4" to 130.6"). The licensee noted that although these three instruments are beyond technical specification limits, three of four instruments would actuate sooner than required. His safety analysis concludes that the required protective function was provided. Instruments A and C are in RPS Channel 11; instrument D is in Channel 12. AOR 75-16 reported the set point drift of instruments A, B and C. Instrument A was found at 8'2", B at 8'3.5" and C at 7'11". The required trip point is the range 7'8.4" to 8'1.6". Instruments A and C are in RPS Channel 11 and instrument B in RPS Channel 12. The licensee has included that the protective function would operate as required as one channel in each trip system was found with its set point to actuate sooner than required. The inspector had no other questions.

e. Emergency Cooling System Vent Radiation Monitor.

The licensee reported that during reactor operations, a component failure in the emergency condenser vent radiation monitor caused the monitor to fail upscale and isolate the emergency condenser system. This operated in accordance with design. The monitor was then replaced. The licensee did have seven days to return an inoperative emergency cooling system to service. The inspector had no other questions at this time.

f. Torus/Reactor Building Vacuum Breaker.

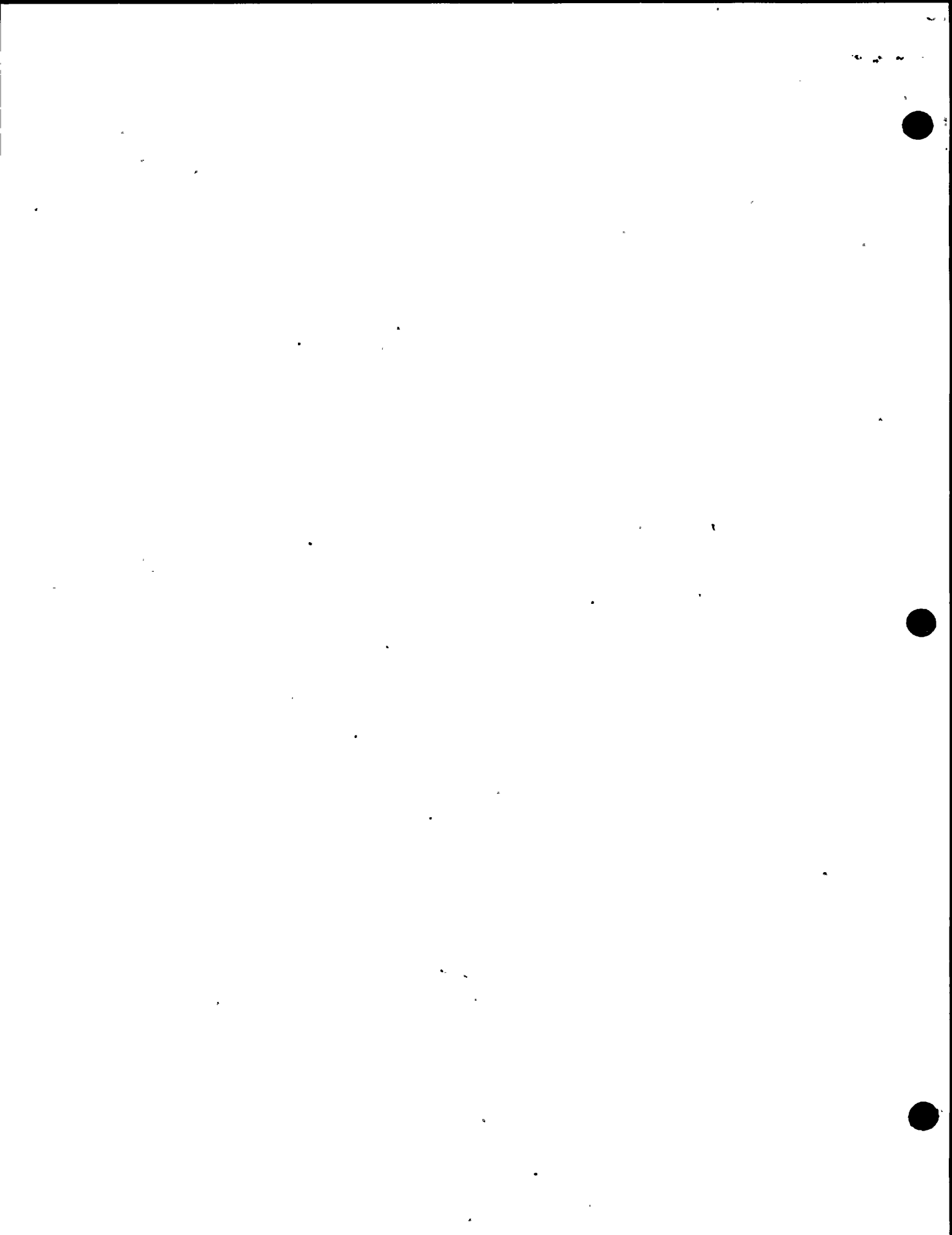
The licensee reported the failure to include a calibration of Torus to Reactor Building vacuum breaker instrumentation in quarterly surveillance testing. System operability had been checked, but additional requirements contained in the Technical Specifications of the full term operating license had not been incorporated. The licensee has completed this testing. The inspector had no other questions at this time.





8. Review of Annual Reports

The inspector reviewed the first annual report of operation of Nine Mile Point Unit 1. The review was conducted based on the requirements of the Technical Specifications and Regulatory Guide 1.16. The inspector found that these reporting requirements were met and that the events reported correlated with facility records. The inspector had no other questions.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

REACTOR FACILITIES BRANCH

FILE COPY

OCT 21 1975

Niagara Mohawk Power Corporation  
Attention: Mr. R. R. Schneider  
Vice President,  
Electric Operations  
300 Erie Boulevard West  
Syracuse, New York 13202

License No. DPR-63  
Inspection No. 50-220/75-15  
Docket No. 50-220

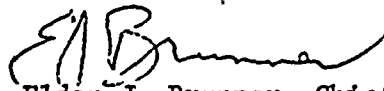
Reference: Your letter dated October 3, 1975  
In response to our letter dated September 12, 1975

Gentlemen:

Thank you for informing us of the corrective and preventive actions you documented in response to our correspondence. These actions will be examined during a subsequent inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,




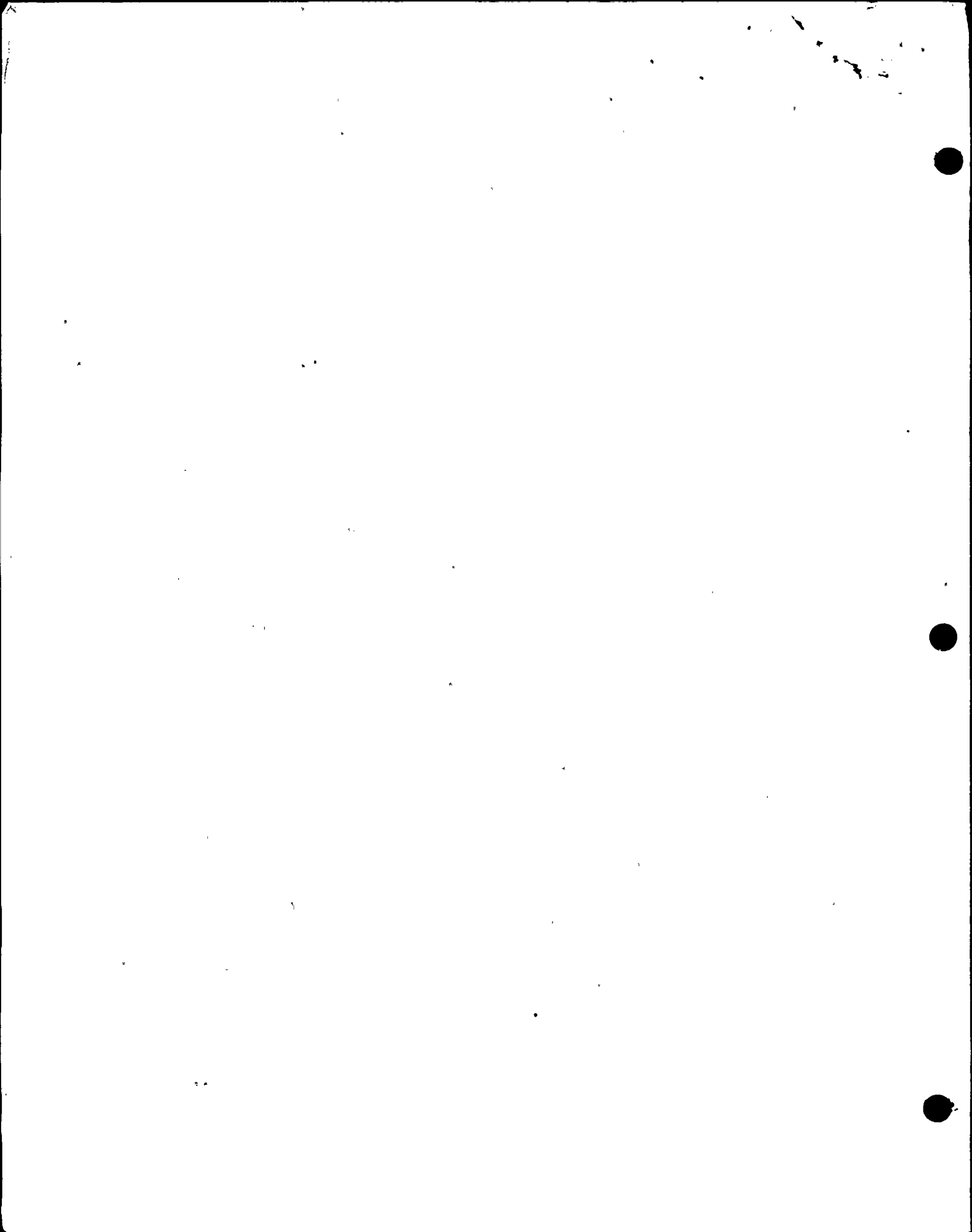
Eldon J. Brunner, Chief  
Reactor Operations Branch

cc: T. E. Lempges, General Superintendent, Nuclear Generation  
T. J. Perkins, Plant Superintendent  
C. L. Stuart, Operations Supervisor  
E. B. Thomas, Jr., Esquire  
A. Z. Roisman, Counsel for Citizens Committee for  
Protection of the Environment

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NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

300 ERIE BOULEVARD, WEST  
SYRACUSE, N. Y. 13202

October 3, 1975

Mr. Eldon J. Brunner, Chief  
Reactor Operations Branch  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19406

RE: Docket No. 50-220  
Inspection Report 75-15

Dear Mr. Brunner:

We have reviewed Inspection Report No. 75-15 for Nine Mile Point Unit #1 and find that an error exists in Appendix A, Item C, "ANSI N45.2.12". This should read, "ANSI N45.2.11" prior to placement in the NRC Public Document Room. Concerning the alleged infractions and deficiencies identified in Appendix A to your report, the following is submitted pursuant to 10 CFR 2 Section 2.201:

- A. "Contrary to 10 CFR 50, Appendix B, Criterion III and XVI, and to FSAR Supplement Twelve, action to correct the inadequacies, identified by the licensee audit on design and modification control, has not been completed or scheduled for completion nor are procedures provided to assure timely corrective action on audit findings."

RESPONSE:

Design and modification control has been implemented pursuant to AP-20, Procedure for Plant/Station Modification, and will be closely monitored by the Quality Control organization at the plant. In addition, a target date of January 1, 1976 has been established for the completion of all modification forms current with the modification progress. It is expected that this action will eliminate further problems in this area and full compliance is expected by January 1, 1976. Regarding the procedural inadequacies, these will be corrected by November 15, 1975 to require corrective action to be completed within 30 days on a schedule established and a follow-up report by the audited organization.

- B. *"Contrary to 10 CFR 50, Appendix B, Criterion V, and to FSAR Supplement Twelve and QCP 16.0, the procedures are not being followed in response to audit findings."*

RESPONSE:

*A copy of this report has been distributed to all plant groups to impress upon them the requirement to respond to a nonconformity report within 15 working days of the date of the report. It will be further emphasized during plant meetings with plant supervisors that adherence to QCP 16.0 is required and expected. The above action will assure the avoidance of further items of noncompliance in this matter. Full compliance has been achieved.*

- C. *"Contrary to 10 CFR 50, Appendix B, Criterion III and the Twelfth Supplement to the FSAR, the engineering and plant procedures have not incorporated all the requirements in the FSAR commitment ANSI N45.2.12."*

RESPONSE:

*The following changes will be made to the Engineering Procedures by January 31, 1976:*

- a. *The requirements of Paragraphs 6.1, 6.2, 6.3, 6.3.2 and 6.3.3 of ANSI N45.2.11 will be included in subsequent revisions of the Engineering Procedures. These requirements dealing with design verification and methods will be included in the appropriate procedures.*
- b. *The 28 design inputs of Paragraph 3.2 to be considered in the development of a design shall be incorporated into the appropriate Engineering Procedure. These inputs could most favorably be included as a checklist.*
- c. *The requirements of Paragraph 8.2 relating to review and approval of design changes shall be included in the next revision of the appropriate Engineering Procedures.*

*AP-20 will be changed to include the provisions of ANSI N45.2.11 by January 31, 1976.*

- D. *"Contrary to the requirements of 10 CFR 50.54 (i-1) and the approved Operator Requalification Program:*
- a. *monthly reviews of the training manuals had not been conducted*
  - b. *annual oral examinations had not been conducted for the three operators selected for review."*

D.

RESPONSE:

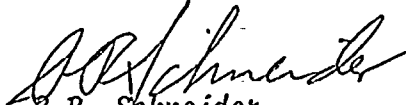
- a. All reviews required by the approved Operator Requalification Program were complete on September 30, 1975. Future reviews will be conducted in accordance with the above program. Full compliance has been achieved on this item.
- b. The three selected operators annual oral examinations were conducted and completed on September 26, 1975, thereby, achieving compliance on this item. All operator required reviews are scheduled to be completed later this year in accordance with the program. The results of these reviews will be used in evaluating the program effectiveness and in planning the future programs.

E. . . "Contrary to the requirements of 10 CFR 50, Appendix B, Criterion V and Section 2.3 of Appendix D to Procedure AP-21, one of the three employees selected for review had not received the required security training."

RESPONSE:

The individual identified in your report was given security training on September 23, 1975. In addition, a review was conducted of all employees to determine if all had been given the security training. The results indicated that 92% had received the training. The remaining 8% will be scheduled for training. Full compliance is expected by November 30, 1975.

Very truly yours,



R.R. Schneider  
Vice President -  
Electric Operations

TJD/mm

Handwritten scribbles and marks in the top right corner, including a small circle and some illegible characters.

