

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

*Reacta Facilities
Branch*

MAR 17 1976

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

License No. CPPR-112
Inspection No. 76-01
Docket No. 50-410

Gentlemen:

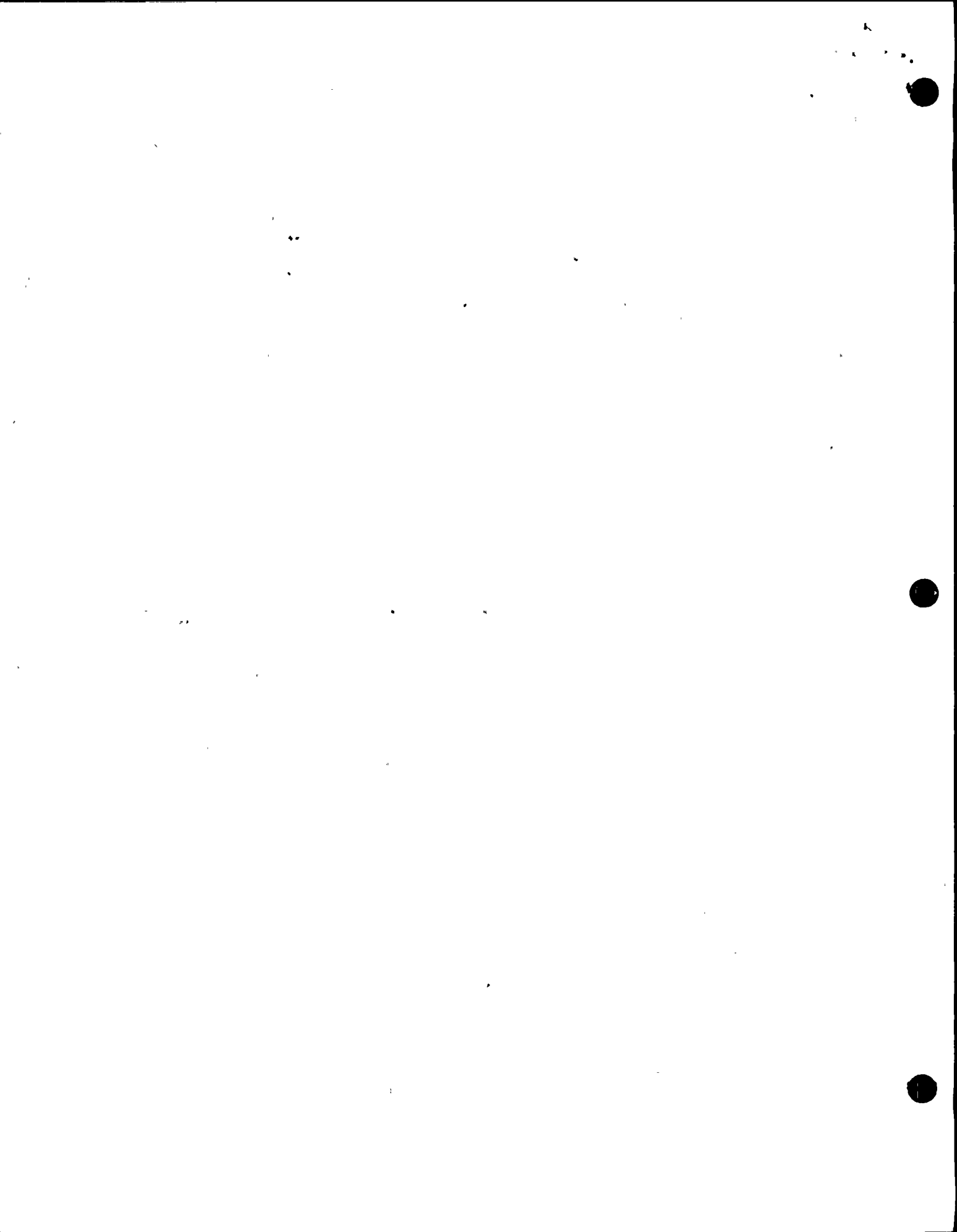
This refers to the inspection conducted by Mr. A. Toth of this office on February 24-26, 1976 at the Nine Mile Point 2 project site and Syracuse offices of activities authorized by NRC License No. CPPR-112 and to the discussions of our findings held by Mr. Toth with Mr. Hilke and Mr. Dowd of your staff at the conclusion of the inspection, and to a subsequent telephone discussion between Mr. Toth and Mr. Bebko on February 27, 1976.

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, and observations by the inspector.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These items of noncompliance have 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.



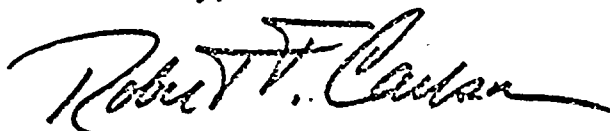
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In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this report contains any information that 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,



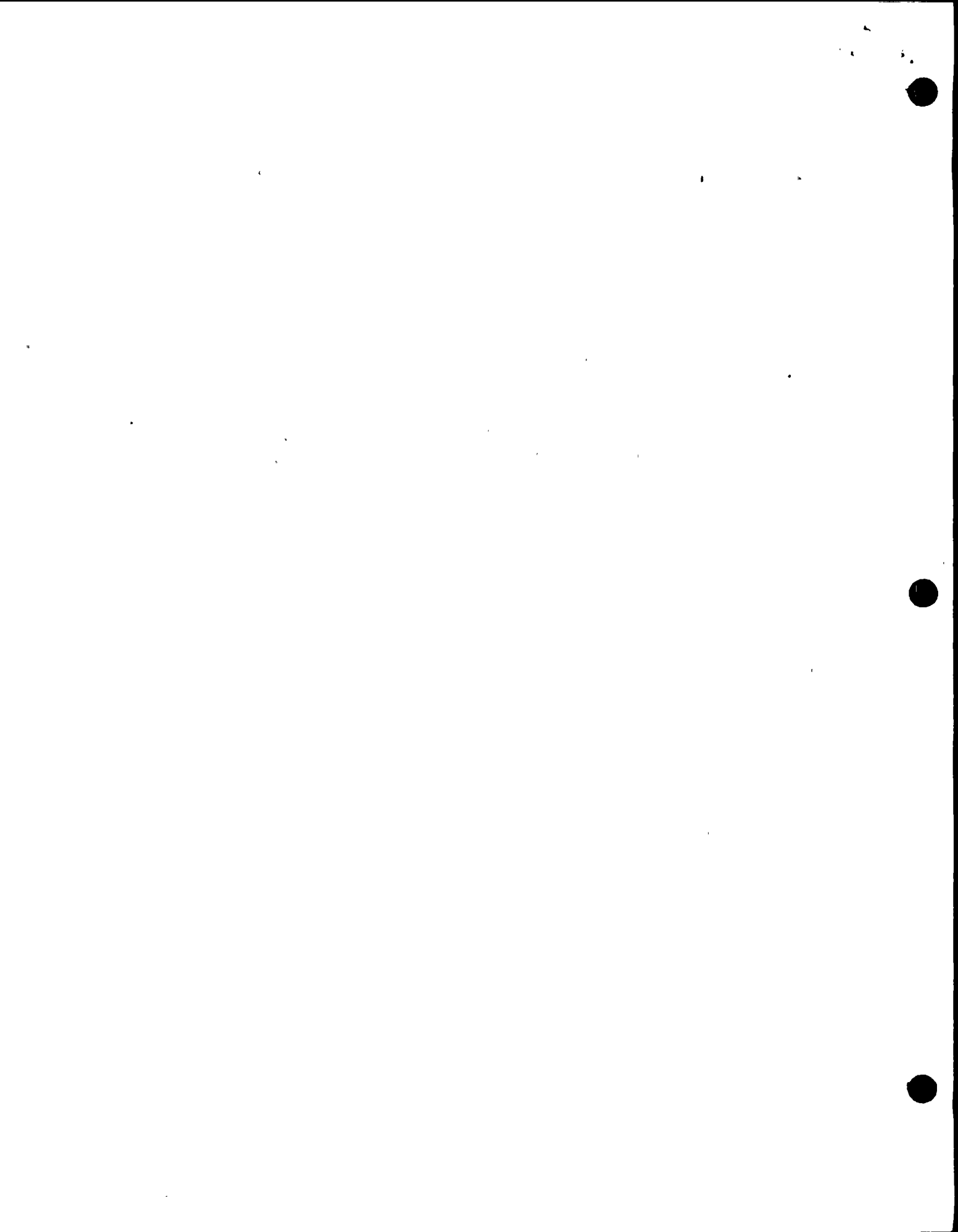
Robert T. Carlson, Chief
Reactor Construction and Engineering
Support Branch

Enclosures:

1. Appendix A, Notice of Violation
2. IE Inspection Report No. 50-410/76-01

cc: Eugene B. Thomas, Jr., Esquire

bcc: (w/encls)
IE Mail & Files (For Appropriate Distribution)
PDR
Local PDR
NSIC
TIC
REG:I Reading Room
State of New York



License No. CPPR-64

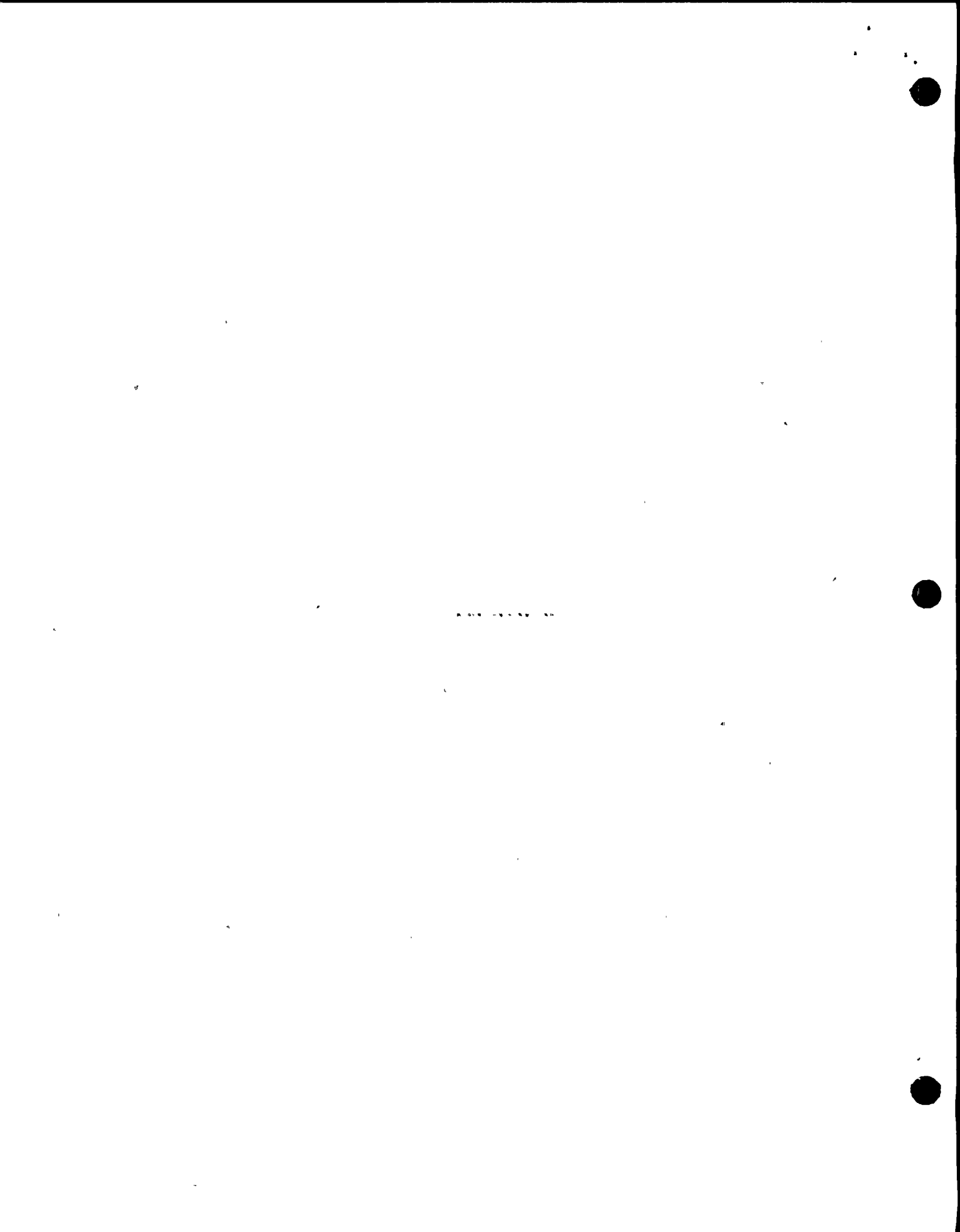
Docket No. 50-410

APPENDIX A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on February 24-26, 1976 it appears that certain of your activities were not conducted in full compliance with NRC regulations and conditions of your license as indicated below:

1. 10 CFR 50, Appendix B, Criterion III, requires that measures be established to assure that appropriate quality standards are specified and included in design documents. Contrary to this, appropriate quality requirements for specification P301N were identified by the licensee quality assurance staff in May 1974 and were repeated in February 1975 but were not incorporated into the specification as late as February 1976. Actions to incorporate the requirements were ineffective and provisions for routine followup were not established. This item is an infraction.
2. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed by and accomplished in accordance with documented instructions or procedures. Contrary to this, the licensee failed to comply with his procedure QAP-4.10 for the review of specifications. The review checklists for specifications reviewed in 1974 through 1976 were not initialed and dated by the Quality Assurance Supervisor or Head Engineer to indicate resolution of or concurrence with staff review comments. This item is an infraction.
3. 10 CFR 50, Appendix B, Criterion XVIII requires that audit results be documented and reviewed by management having responsibility in the area audited, and followup actions shall be taken where indicated. Contrary to this, unsatisfactory findings resulting from "S&W Field Audit #3" were not documented on "Nonconformity" or "Quality Deficiency" forms and entered in the "Nonconformity Log" or "Quality Deficiency Log" for assuring followup, as required by license procedure QAP-16.40. This item is a deficiency.



AS OF _____
REGION 1 HAS NOT OBTAINED PROPRIETARY
CLEARANCE IN ACCORDANCE WITH 10 CFR 2290
MAR 15 1976

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

IE Inspection Report No: 50-410/76-01 Docket No: 50-410

Licensee: Niagara Mohawk Power Corporation License No: CPPR-112
300 Erie Boulevard - West Priority: _____
Syracuse, New York 13202 Category: A

Location: Nine Mile Point, Unit No. 2 Safeguards Group: _____
Scriba, New York

Type of Licensee: BWR, 1100 MWe (GE)

Type of Inspection: Routine, Unannounced

Dates of Inspection: February 24-26, 1976

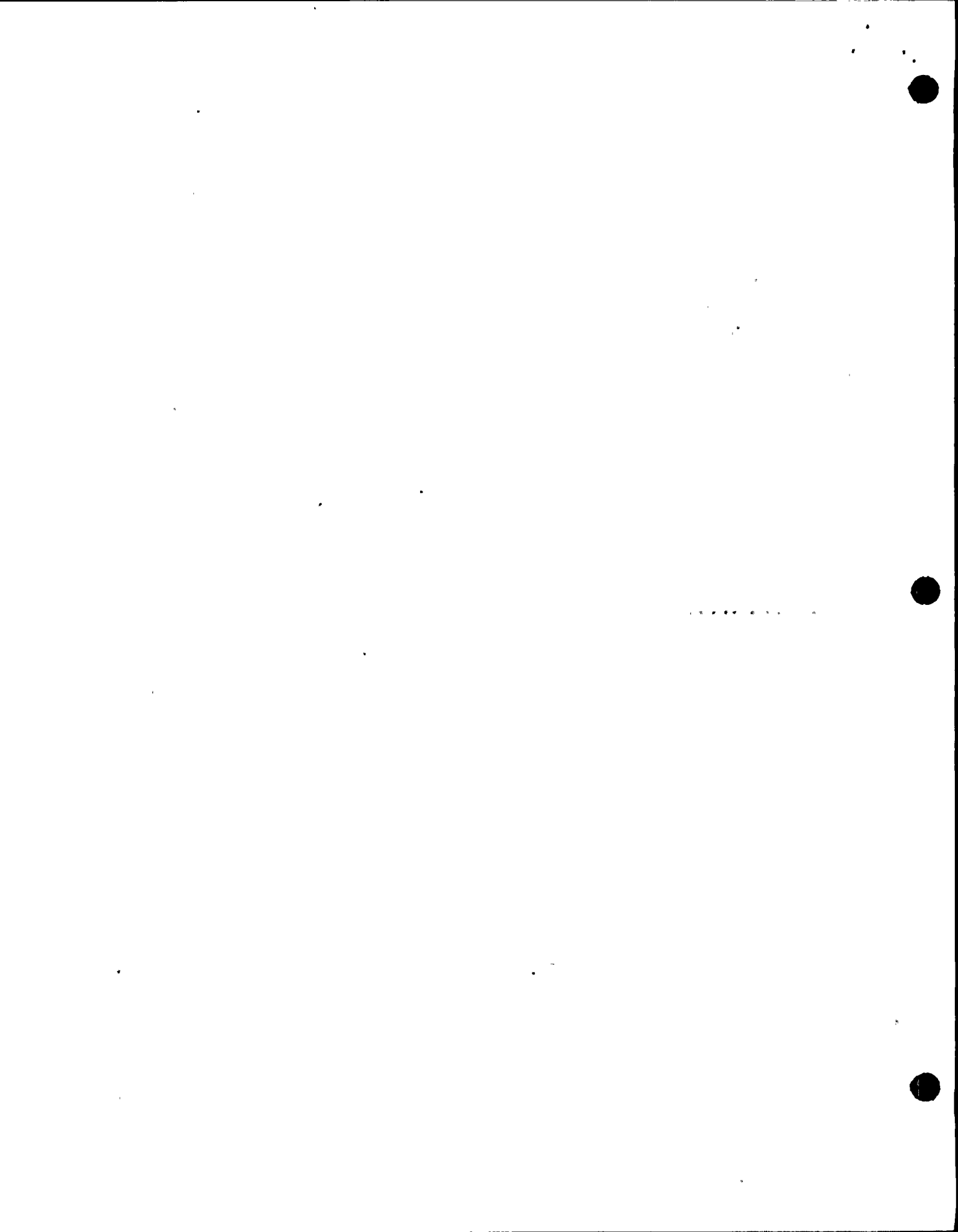
Dates of Previous Inspection: October 21-22, 1975

Reporting Inspector: A. D. Toth 3-15-76
A. D. Toth, Reactor Inspector DATE

Accompanying Inspectors: R. C. Napuda 3/15/76
G. Napuda, Reactor Inspector DATE

Other Accompanying Personnel: None DATE

Reviewed By: R. F. Heishman 3/17/76
R. F. Heishman, Chief, Construction Projects Section DATE



SUMMARY OF FINDINGS

Enforcement Action

A. Infractions

1. Quality assurance measures did not assure that appropriate quality requirements were included in design documents. (Details, Paragraph 3)
2. Specification review procedures were not complied with to document management review/action on quality assurance staff concerns. (Details, Paragraph 4)

B. Deficiencies

Documentation of audit findings of one audit was not in accordance with program requirements to assure follow-up. (Details, Paragraph 5)

Licensee Action on Previously Identified Enforcement Items

None Identified.

Design Changes

None Identified.

Unusual Occurrences

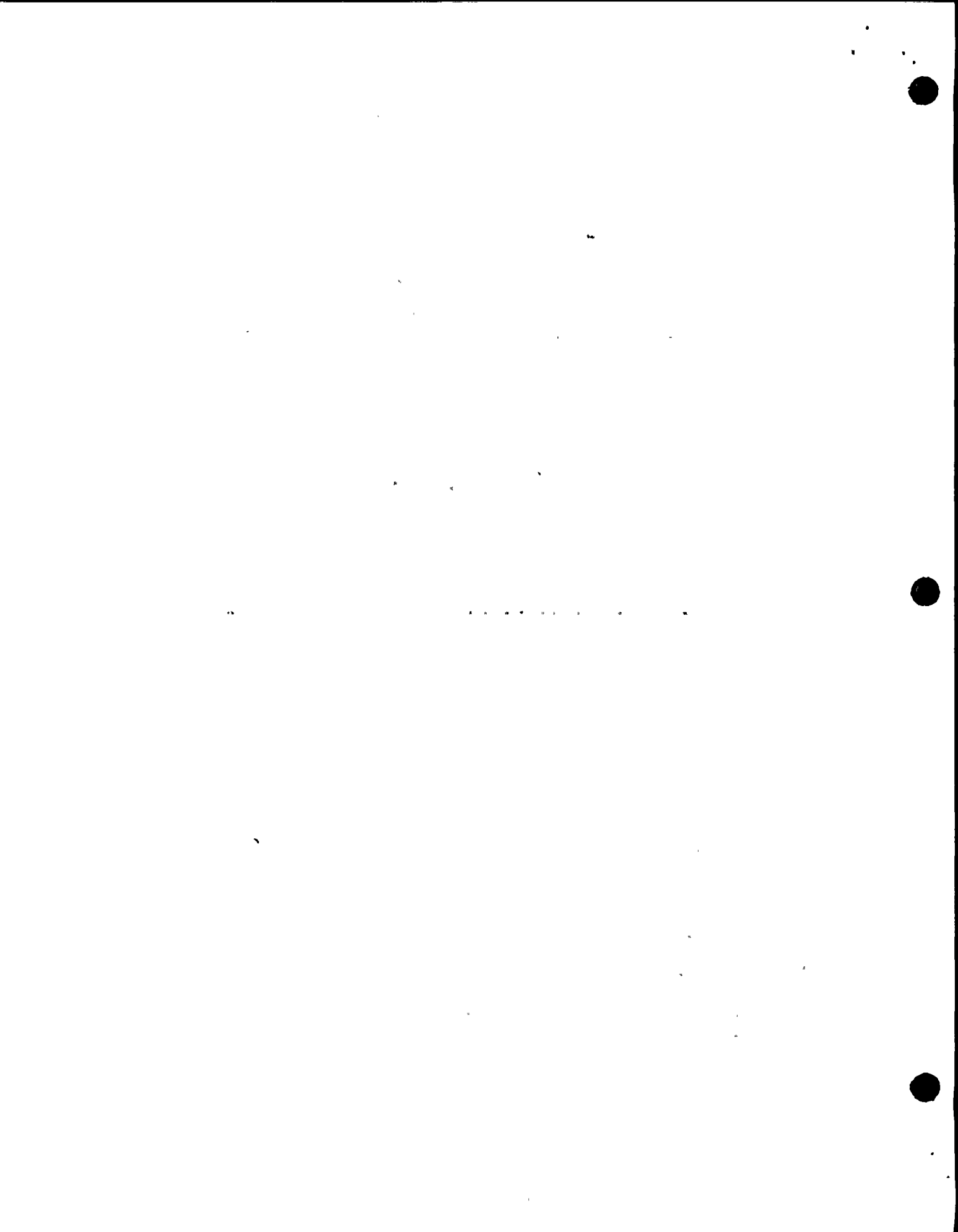
None Reported.

Other Significant Findings

A. Current Findings

1. Acceptable Items

The following items were inspected and are considered acceptable with respect to those aspects described in the Details of this report and subject to any specific exceptions which may be noted elsewhere under Enforcement Action or Current Findings of this report. (Details, Paragraph 10, Subparagraphs as listed below).



- a. Offsite material storage facility and associated material receipt inspection/control.
- b. Licensee corrective action control procedure for items other than document review comment control.
- c. Licensee specification review, except comment follow-up.
- d. The Project Manual as a supplemental manual of procedures relating to quality affecting activities.
- e. Licensee auditing of major contractors.
- f. Licensee review of Construction Manager's Quality Program.
- g. Site Quality Assurance and Quality Control Organizations.

2. Unresolved Items

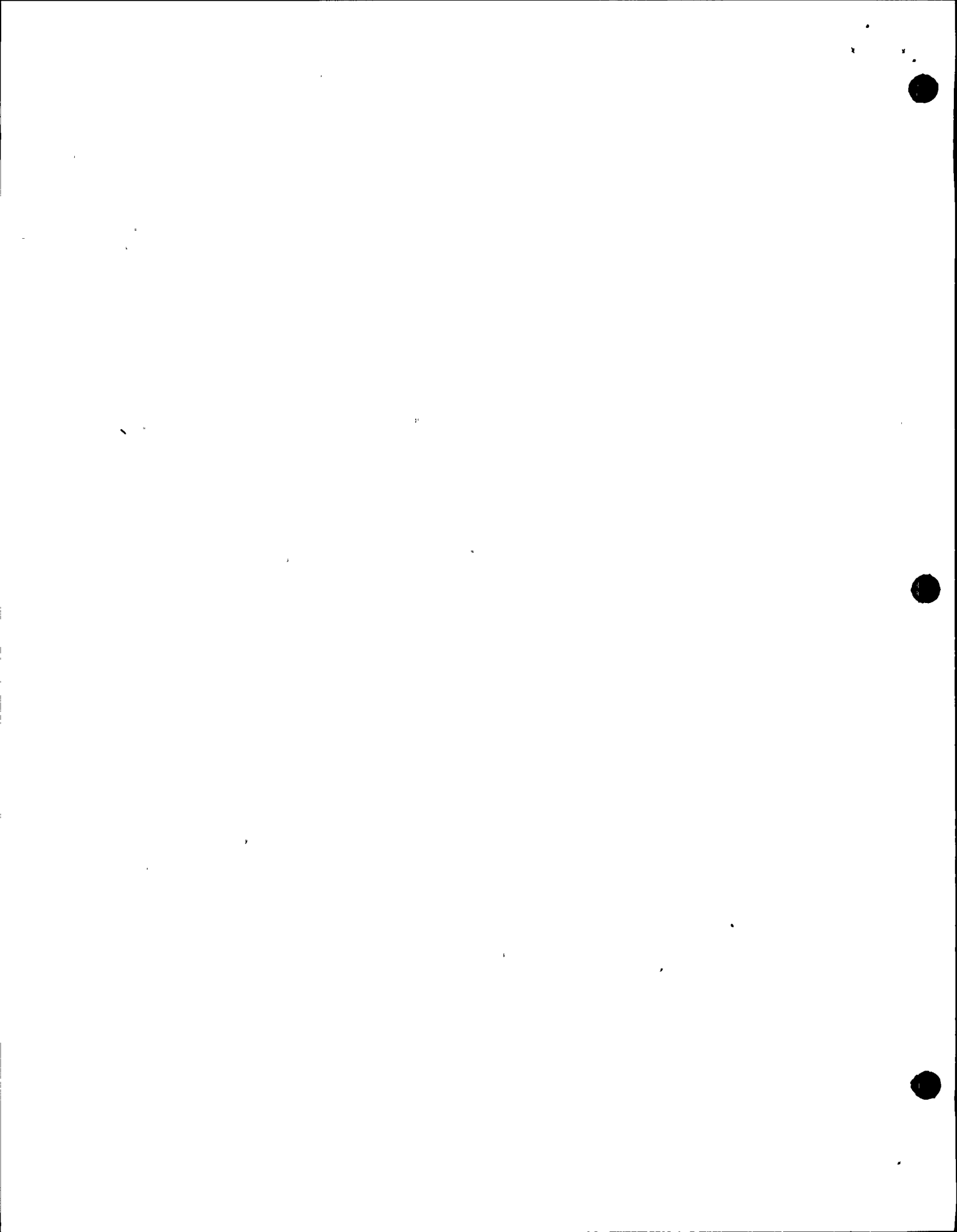
The following items have been identified as unresolved.

- a. The licensee procedure for specification reviews does not require commensurate review of changes. (Details, Paragraph 6)
- b. The on-site master QA file has not yet been established. (Details, Paragraph 7)

B. Status of Previously Identified Unresolved Items

1. The following items have been resolved as noted. (Details, Paragraph 8, subparagraphs as listed below):
 - a. IE Inspection Report No. 50-410/75-02, Details, item 6. The administrative system includes data and schedules and staff responsibilities to assure timely preparation of required construction methods procedures.
 - b. IE Inspection Report No. 50-410/75-04, Details, item 7. Site staff position descriptions for key personnel have been established.
2. Certain actions have been taken on the following item but it remains unresolved as noted. (Details, Paragraph 9)

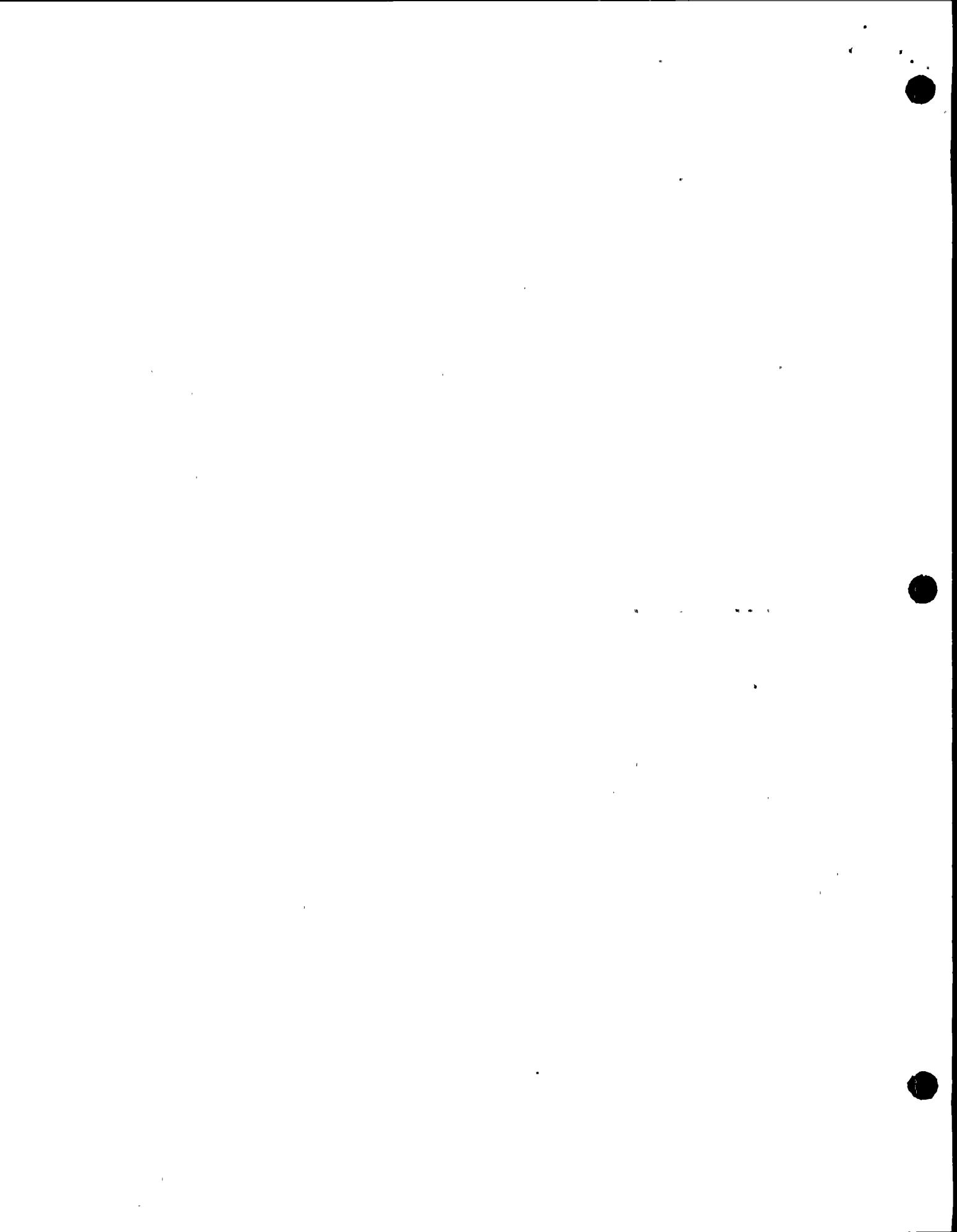
IE Inspection Report No. 50-410/75-04, Details, item 8. A matrix of the applicable constructor procedures is scheduled for incorporation into the QA Manual by May 1, 1976.



Management Interview

At the conclusion of the inspection a meeting was held at the Syracuse offices of the Niagara Mohawk Power Corporation with representatives of the licensee organization, Attendees at this meeting consisted of personnel whose names are highlighted (i.e. *) in paragraph 1 of the Details Section of this report.

The inspector summarized the purpose and the scope of the inspection (Details, Paragraph 2), and the results of the inspection (as listed in the "Summary of Findings").



DETAILS

1. Persons Contacted

Niagara Mohawk Power Corporation

D. P. Dise, Manager, Quality Assurance
*R. A. Dowd, Supervisor, Quality Assurance
*J. J. Bebko, Lead Engineer, Quality Assurance
J. P. Costello, Site Quality Assurance Engineer
D. Palmer, Quality Assurance Engineer
J. Hilke, Project Manager
J. Niezabytowski, Contract Administrator, Purchasing

Stone & Webster Engineering Corporation

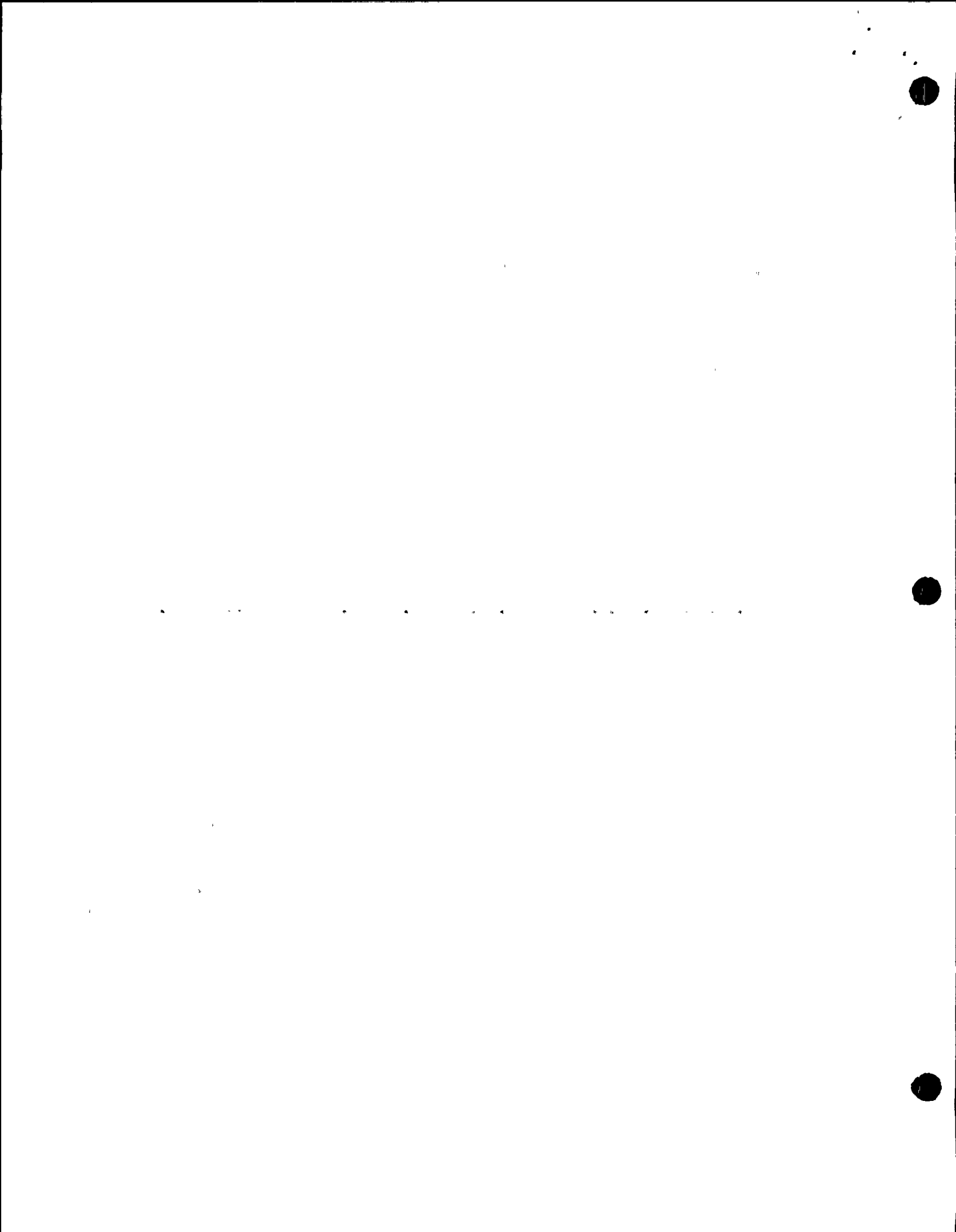
H. Astle, Quality Control Engineer
L. Barbiers, Lead Structural Engineer-Quality Control
B. W. Gatlin, Supervisor of Quality Control
E. Peacock, Senior Inspector

Dames and Moore

S. Rossello, Staff Geologist
A. Spanor, Staff Geologist
W. Ullah, Civil Engineer

2. Status of Project

Excavation of the reactor building area has progressed to a depth of about 80 feet. Sealing and mapping of the excavation walls is in progress. Warehouse facility framing is in progress. Batch plant erection is scheduled to begin April 1, with qualifications completion and leveling course concrete placement planned for June 1, 1976.



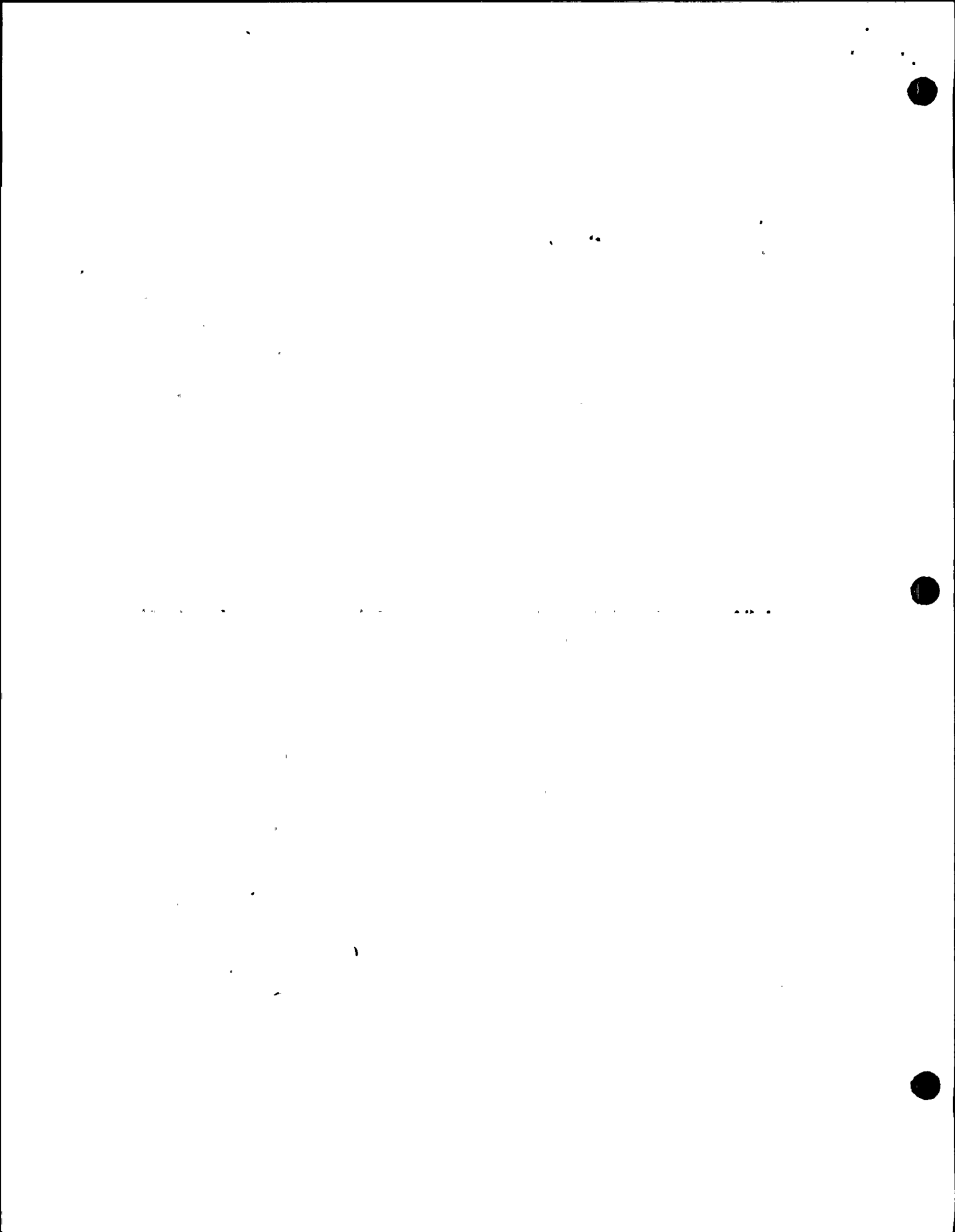
3. Infraction: Review of Specifications

Contrary to the requirements of 10 CFR 50 Appendix B Criterion III, and PSAR Section D.2.3, the quality assurance measures did not assure that appropriate quality standards were included in design documents. The licensee staff identified specific quality requirements which were to be incorporated into specification P301N (#67) prior to award of contract, but the contract was awarded without incorporation of the identified requirements and without measures to follow-up to assure subsequent incorporation. The licensee staff review of a subsequent amendment to specification P301N failed to recognize that previous comments existed and had not been resolved. A subsequent general review of handling of quality assurance staff comments did identify the omission, but correction of the omission and improvement of routine comment follow-up have not yet been effected as of one year later.

The inspector reviewed the following documents:

Procedure 4-10 Rev. 1 Review of Procurement Documents for
Quality Content
Specification P301N (#67) Dated 3-21-74 for Piping Supports
Review Checklist Dated 4-29-74 Re: Five QA Requirements/Comments
Comment Memo Dated 5-3-74 Re: Five QA Comments
Transmittal Memo Dated 5-7-74 Requesting A/E Action
A/E Memo Dated 6-10-74 Concurs w/QA comments
Review Checklist Dated 6-6-74 Re: Five QA Comments
Comparison of Bids Dated 5-24-74 w/QA Dept Concurrence 6-10-74
Specification P301N Addendum #1 Dated 12-21-74
Review Checklist Dated 1-14-75 Re: Two new QA comments
QA Memo 74--63 Dated 2-27-75 QA Staff Comment Survey
Delivery Schedule Dated 1-30-76 Requests release for fabrication
January 1977
Specification Index Dated 1-28-76 Shows P301N latest addendum #1

These documents showed licensee quality assurance staff review of specification P301N as required by procedure QAP-4-10. Comments were documented by May 3, 1974 memo which identified five areas of concern. The quality assurance section signed the bid evaluation for award of contract June 10, 1974. This appeared reasonable in view of a June 10, 1974 contractor memo in the licensee QA file which showed contractor intent to incorporate the QA section concerns into Addenda 1 of the specification, (after contract award). When Addenda 1 was submitted in December 1974, it did not include the QA comments. The licensee



review of Addenda 1 did not recognize this omission, but did identify two new concerns. There is no evidence in the licensee QA file to indicate that the five original or two more recent concerns had been followed to assure resolution.

A February 27, 1975 memo identifies that the licensee QA staff reviewed the files of 28 specifications issued since 1973, to determine resolution of QA comments. Specification P301N was identified as one specification where comments were not incorporated but QA section had not signed the bid evaluation. There is no other documentation of follow-up on unresolved comments, as of February 27, 1976. For specification P301N, design is in progress by the vendor and he has requested a release for fabrication by January 1977.

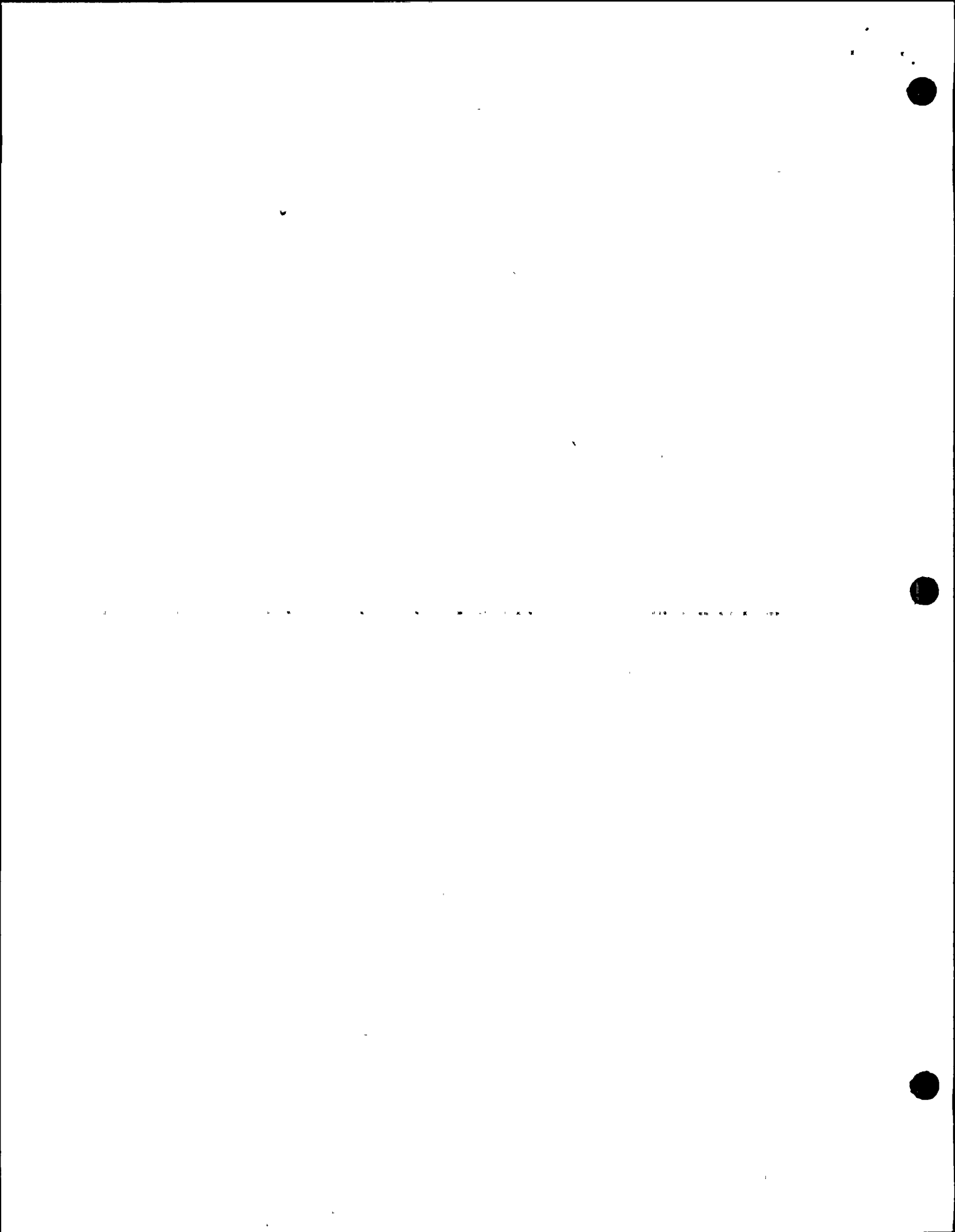
The licensee stated that a new status review is now in progress by the QA staff. However, the inspector could not identify that the document review system currently contains sufficient provisions to assure follow-up of QA comments on specifications.

4. Infraction: Specification Review Checklists

Contrary to the requirements of 10 CFR 50 Appendix B Criterion V, and PSAR section D.2.5, the licensee quality assurance department review of specifications was not conducted in accordance with procedure QAP-4-10. Specifically, the review checklists for specifications reviewed in 1974, 1975 and 1976 were not initialed and dated by the Quality Assurance Supervisor or Quality Assurance lead engineer to indicate resolution of or concurrence with the staff comments.

The inspector examined QA section checklists for review of specifications, which are required by procedure QAP-4-10. Review sheets for the years 1974, 1975 and 1976 were examined, including those for specifications numbered 67, 403, 104, 306, E061A, S203A, S203C, S203H, S203E, S203F, and others.

Procedure QAP-4-10 required that the checklists be reviewed and positioned by the Quality Assurance supervisor (prior to January 1975) or by the QA lead engineer (after January 1975). The procedure requires that the supervisor or lead engineer sign and date the form as evidence of review and resolution or concurrence with the staff members' comments. The forms used in 1974, 1975 and 1976 provide space designated for QA Supervisor only.



The checklists for 1974, 1975 and 1976 were found to not always contain the required review signature of the QA Supervisor (prior to 1975) or the lead engineer (1975 and after). However, there was in some cases evidence that the review/concurrence had in fact occurred in that the memo to the project manager, per procedure 4-10, was prepared by the QA Supervisor or lead engineer and appeared in the specification file in conjunction with the review checklists. The inspector did not verify that in every case such supporting evidence was available.

5. Deficiency: Documentation of Identified Discrepancies in Audit Reports

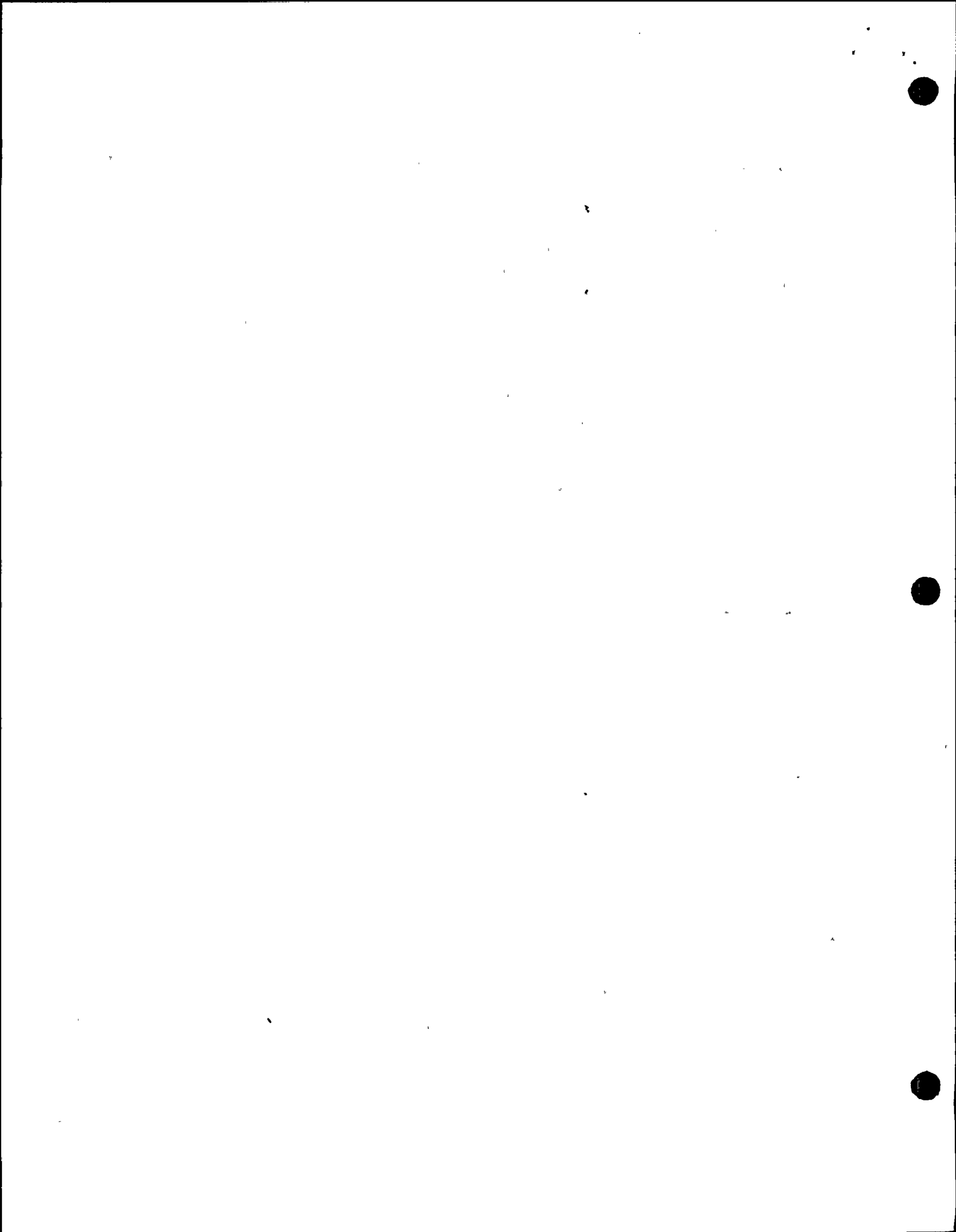
10 CFR 50 Appendix B, Criterion XVIII requires that audit results be documented and reviewed by management having responsibility in the area audited and follow-up action shall be taken where indicated. In addition, PSAR Appendix D, paragraph D.2.18 states "The audit report shall list all discrepancies found and the persons or organizations assigned corrective actions." QAP 16.40 requires that all unsatisfactory audit findings be entered on prescribed "Nonconformity" or "Quality Deficiency" forms and listed in the applicable "Nonconformity Log" or "Quality Deficiency Log."

The inspector reviewed the "S&W Field Audit #3" documentation package and found that three unsatisfactory findings were identified by the auditor but were not documented in the audit report or entered into the established corrective action system via the prescribed forms and logs.

Further discussions with the personnel involved revealed that the significance of the items was recognized and some follow up action was being conducted but not documented. The inspector requested the status of these items and was provided the information after the licensee obtained that information through a series of telephone conversations. The inspector determined that corrective action was in progress and commensurate with the project status. One of these items is discussed in paragraph 7 of this report.

6. Unresolved: Review of Specification Changes

Licensee procedure QAP-4-10 provides for licensee QA review of selected procurement documents for quality content, and it describes how to conduct the review and transmit review results to the project manager for action. The procedure does not include a follow-up system, but if the quality assurance lead engineer considers the comments significant he can make signoff of the subsequent vendor bid evaluation form conditional upon incorporation of the QA comments. Records show that the approach has in fact been taken in the past.



The procedure does not include provisions to assure that changes to previously reviewed specifications also receive review by the QA staff, as required by 10 CFR 50 Appendix B Criterion VI. However, the licensee stated that to date the QA staff has reviewed all specifications and addenda for the project, rather than only selected ones as permitted by QAP-4-10, and the need for special attention to addenda has thus not arisen. Considering that this may change in the future, and the procedure QAP-4-10 permits more selective action, the licensee stated that procedure QAP-4-10 will be re-examined with respect to this consideration. This item is unresolved.

7. Unresolved: Storage of Quality Records

The Master QA file identified in the PSAR has not yet been erected onsite. It is scheduled for completion prior to November 1976 and is planned to include a fire-proof room and fire resistant cabinets, as defined in the PSAR. The inspector noted that quality records are currently being generated for site activities and are stored onsite, and it was not clear whether or not these record storage provisions were considered as part of the Master QA file. The licensee QA staff had also identified this item during an audit of site activities, but resolution/disposition or follow-up was not documented. (See Paragraph 5 of this report).

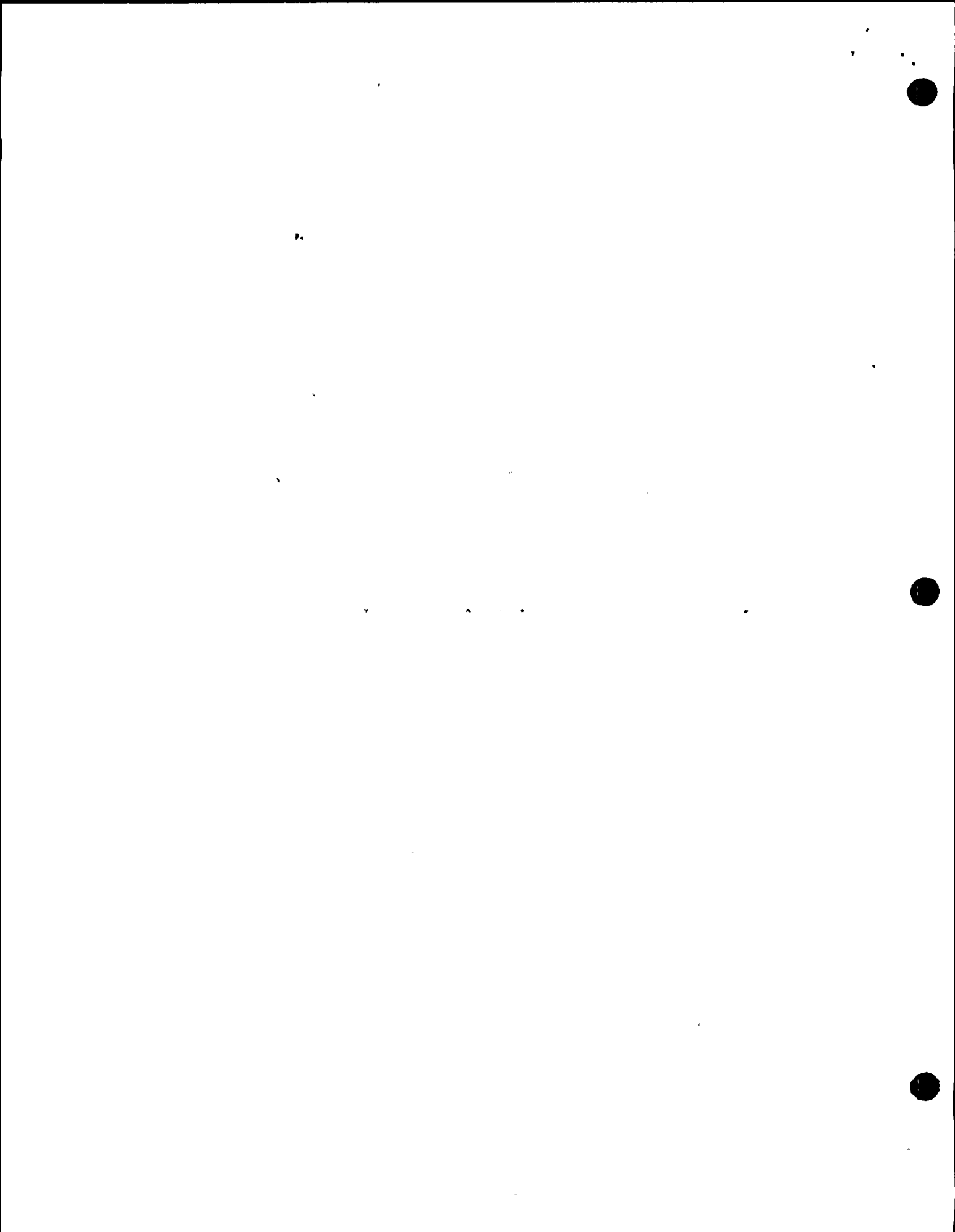
The licensee reviewed the current storage status prior to the completion of the inspection and advised the inspector that as far as was known the records onsite all had duplicates offsite. This would comply with the records preservation methods of ANSI N45.2.9 as an interim provision pending construction completion of the permanent Master QA file. The inspector did not review the onsite records to verify duplicates at this inspection. This is unresolved pending such review.

8. The following items are resolved:

a. Resolution: Construction Methods Procedures

The administrative system includes data and schedules and staff responsibilities to assure timely preparation of required construction methods procedures. This resolves item numbered 6 of the Details section of IE Inspection Reports No. 50-410/75-02 and 75-04.

The inspector examined the manual of Construction Methods Procedures. The manual contained a Table of Contents which identifies those CMP's anticipated, and the date of issue for those which have been issued. The manual contains CMP-2.2 for "Earthwork" (backfill) and CMP-1.6 for "Check of Survey Instruments" dated February 11, 1976 and January 28, 1976, respectively.



The inspector interviewed the site senior field quality control manager, who stated that the Field Quality Control (FQC) group assures that CMP's are issued on a schedule compatible with dates of related work activity starts. The inspector examined a status chart maintained by the FQC group as an aid to assuring timely issue of the CMP's. The chart identified each CMP listed in the CMP manual index, listed its status, and provided identification of its issue date.

b. Resolution: Licensee Site Staff Position Descriptions

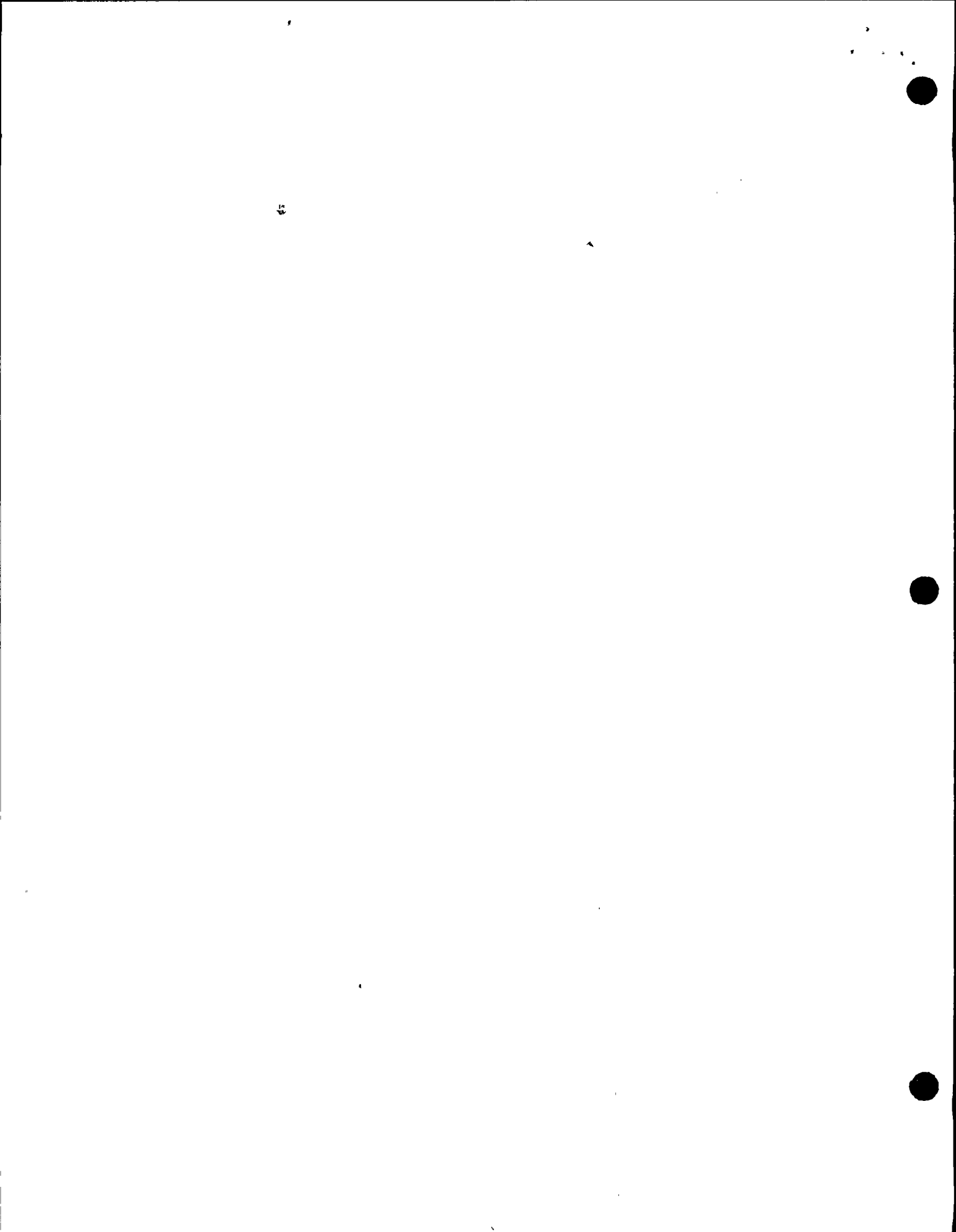
Site staff position descriptions for key personnel have been established. This resolved item number 7 of the Details section of IE Inspection Report No. 50-410/75-04.

The inspector examined licensee internal memoranda dated 11/24/75, 12/19/75 and 1/1/76 which describe the position descriptions and statements of authority and responsibility for the site senior QA engineer, the construction Senior Site Representative, and the Construction Management and Coordination Staff Personnel. These identified responsibilities and authority, including stop-work authority. The delegations of duties are as provided for in licensee procedures QAP-1.01 and QAP-1.10.

9. Status of Unresolved Item: Definition of Contractor's QA Program

The constructor's QA program is not fully defined for this project, but a plan of action has been established and is scheduled for completion by May 1, 1976. Item number 8 of the Details section of IE Inspection Report No. 50-410/75-04 is still unresolved.

The inspector examined the constructor's manuals of procedures at the site to ascertain their applicability to the work. The particular manuals examined included those listed in the procedures matrix of the Standard Nuclear Quality Assurance Program (SWSQAP) Appendix I, as modified by the client considerations described in the December 15, 1975 licensee letter to NRC. The inspector observed that the customized version of the SWSQAR for this project clarifies that the ASME Section III Manual is not applicable to contractors which will have their own QA programs. The licensee stated that piping, component and containment liner contractors will have their own programs.



The inspector observed that an NDT Manual exists which describes methods and techniques of nondestructive examination. Quality Assurance Directive QAD-5.1 Rev. 5 states that specific applicability of procedures in the NDT Manual are determined by the Project QA Manual. However, such information is not included in the Project QA Manuals, which would imply that the NDT manual is not applicable. However, the NDT Manual includes in it an applicability sheet which lists the Nine Mile Point 2 project. With these inconsistencies, it is not clear as to applicability of specific procedures in the NDT Manual. At this time, no activities are yet in progress which would require use of procedures of the NDT Manual.

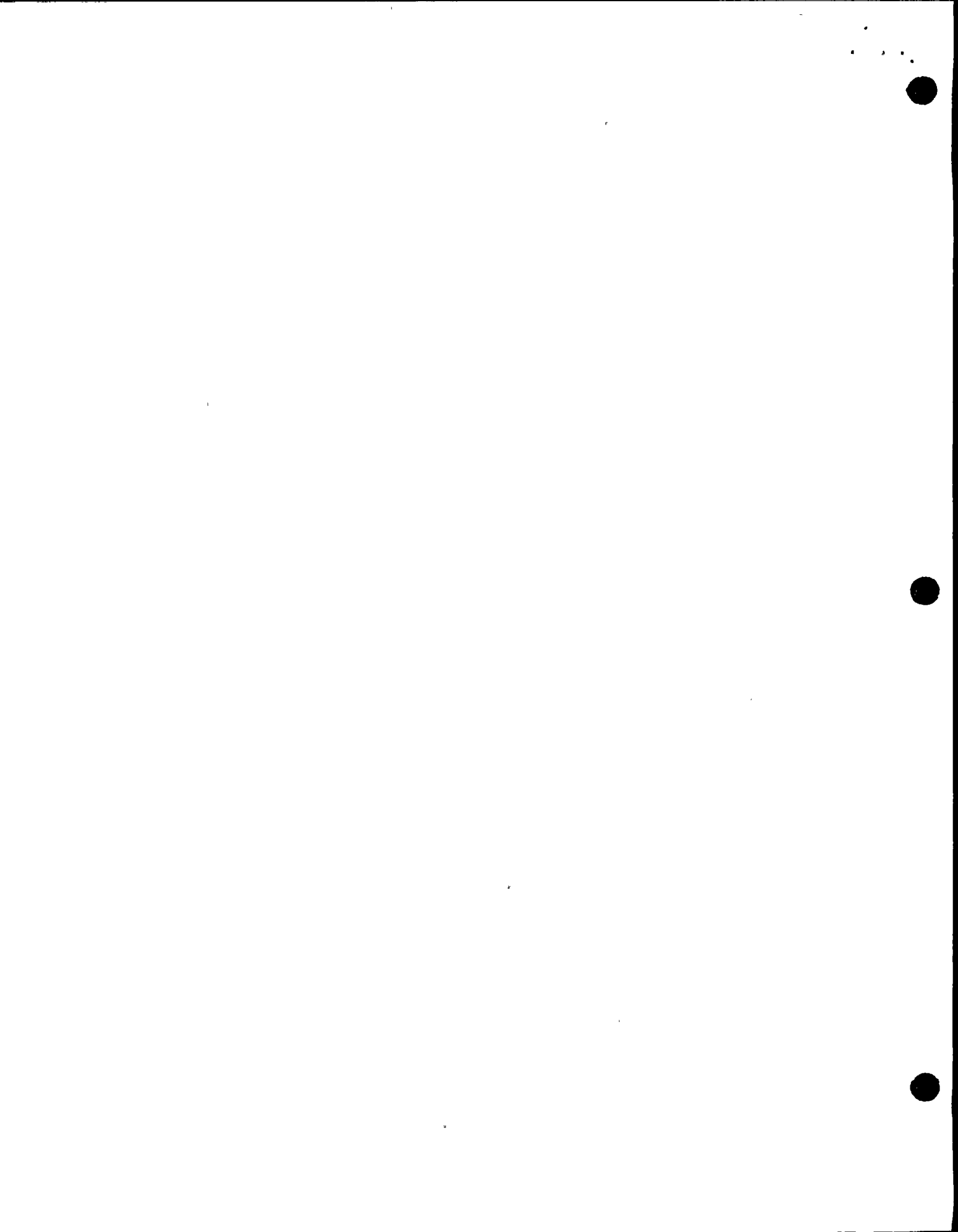
The inspector also examined a Project Manual which included procedures and instructions titled Project General Instructions, Project Memos, Project Guidelines, and Project Procedures. These instructions defined interface controls between contractors, handling of PSAR changes, control of document designations, compliance with regulatory guides, specification index and status log, key personnel names, and similar guides for performing and controlling work. This manual appears to be an aspect of the quality assurance program as related to the specific project such as to warrant at least identification and reference in the QA manual.

The inspector also observed a Calibration Manual, Construction Procedure Manual, and a Quality Control Instruction Manual, which are sets of procedures not identified in the QA manual and not identified as a part of the QA program.

The licensee stated that the specific applicability of procedures of the NDT Manual will be clarified, and that a detailed procedural matrix would be defined and incorporated into the QA program manual. The licensee stated that the principal consideration for the detailed matrix of procedures was to present it or reference it in such a manner as to permit reasonable flexibility to modify it without need for NRC review each time. These actions are planned for completion by May 1, 1976.

10. Acceptable Items

The following items were examined by the inspectors and are considered acceptable with respect to those items discussed below and subject to the exceptions noted:



a. Offsite Material Storage

The inspector visited the offsite warehouse of Higgins Erectors in Syracuse, New York. Some valves and other miscellaneous equipment and supplies are stored there pending completion of an onsite warehouse in August 1976. The facility is weatherproof, humidity is monitored, material is tagged as to inspection status, and nonconforming items are clearly identified. Very little equipment is at this facility, and receiving inspection activities are performed by site quality control staff who travel to the facility as necessary. No nonconformance with quality program requirements was observed by the inspector.

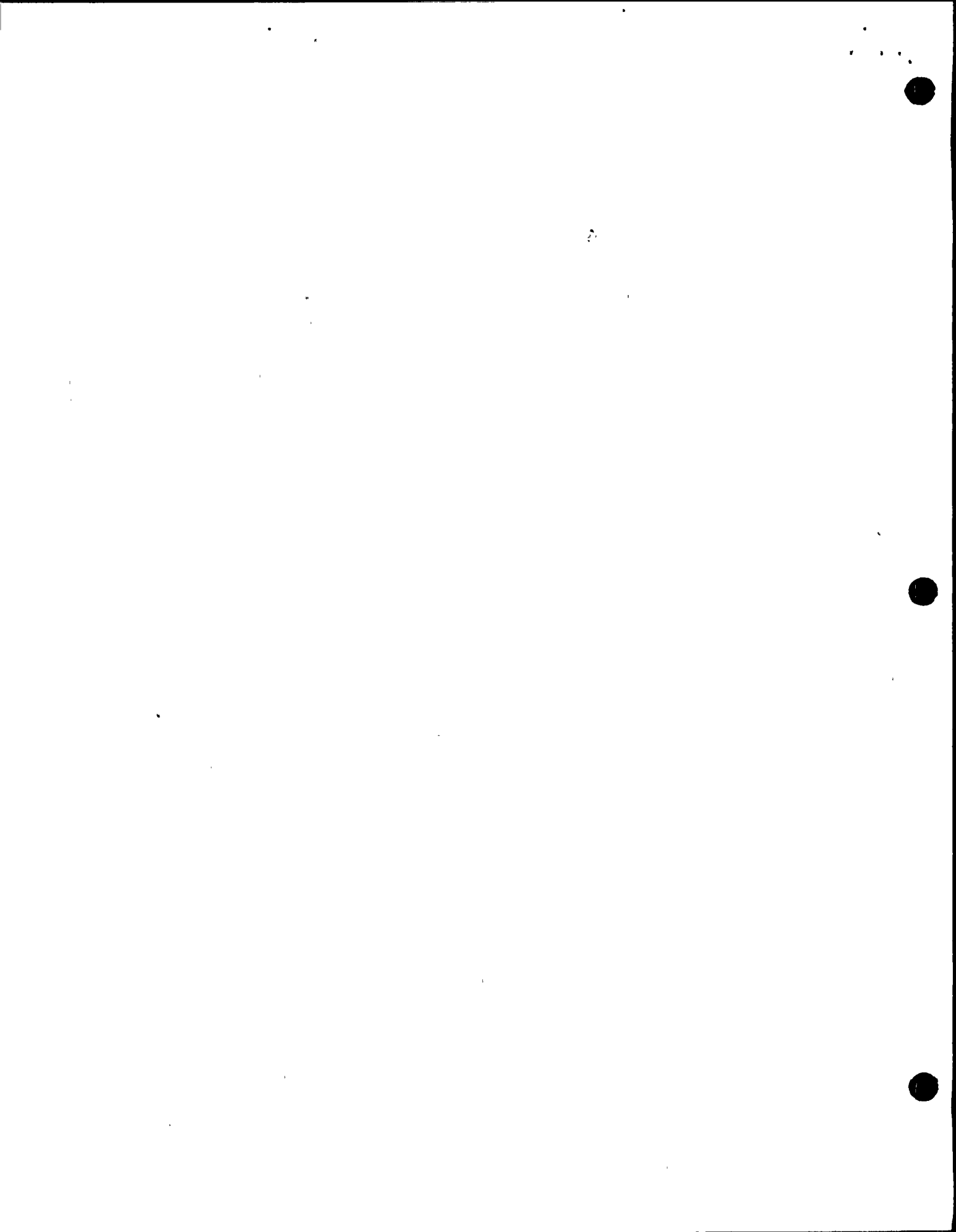
b. Examination of Licensee Corrective Action Controls

The inspector examined procedure QAP-16.40 Rev. 0 dated January 1975. This provides forms for reporting quality problems and logs for recording and monitoring status of corrective action. The procedure requires that responses to Nonconformity or Quality Deficiency forms be received within 22 working days and that evaluation of the response be completed in two weeks. The nonconformity log, for tracking status, is required to be updated within five days of issuance of a Nonconformity or Quality Deficiency form. Definition of staff and supervision responsibilities is included, for routine follow-up and action on unacceptable responses. This system/procedure is not applied to document deficiencies identified via document reviews performed by the licensee.

c. Examination of Specifications

The inspector reviewed the specification list contained in the Project Manual Volume II and selected several specifications for examination. The specification files for the following specifications were reviewed with respect to licensee quality assurance staff review records:

S203A	Mixing and Delivery of Concrete
S203C	Civil and Concrete Construction (includes rebar installation)
S203E	Reinforcing Steel Procurement
S203F	Radial Shear Reinforcing Steel
S203H	Concrete Testing Services
C052A	Control System Safety and Relief Valves
E031A	Standby Diesel Generator Systems
P283B	Containment Liner
P301B	Shop Fabricated Pipe
C051B	Control Valves



The inspector verified that review checklists, as required by procedure QAP-4-10, had been applied to the review of these documents. Comment transmitted to the project manager, were in accordance with procedure QAP-4-10. Comment resolution was not available for review in all cases, as described in paragraph 3 of this report. Some of the review checklists did not contain required signatures, as described in paragraph 4 of this report.

d. Examination of Project Manual

The inspector reviewed the Project Manual to determine its content with respect to the aggregate collection of procedures which constitute the quality assurance manual for the project. The manual consists of two volumes and includes the following typical procedures/instructions:

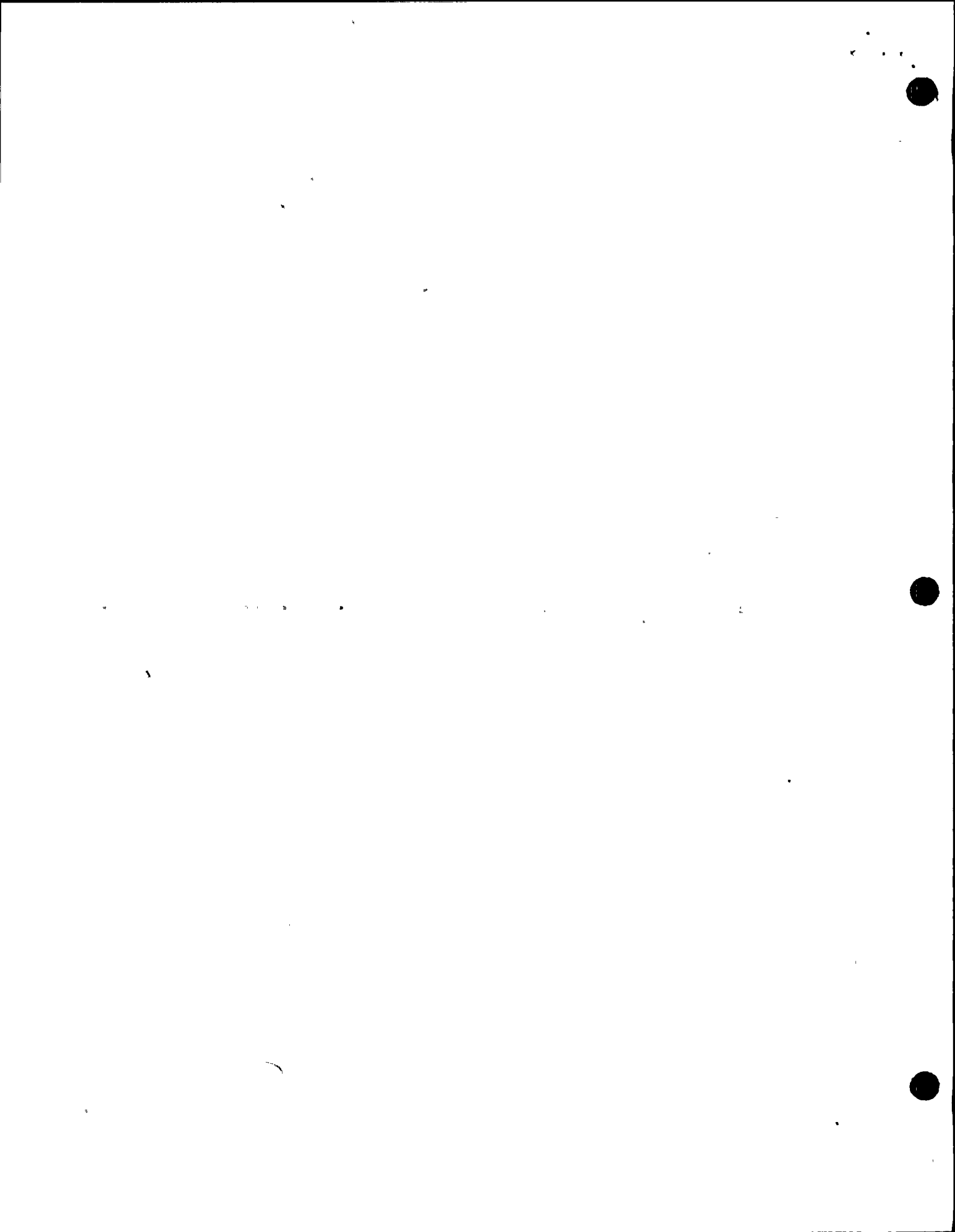
Project Memo PM-19-III	Structure Names List
Project Memo PM-31-III	Marking Engineering Documents w/QA Category
Project Guideline PG-10-VI	Contractor/Licensee Interfaces
Project Procedure PP-12-VI	PSAR Change Control
Project Procedure PP-20-VI	Compliance w/Reg Guides
Project Procedure PP-21-VI	Project Review of Operating Experience Reports and Reactor Construction Experiences
Specification Index	

The inspector determined that these documents related to implementation of PSAR commitments and quality assurance program implementation, and represent a part of the quality assurance manual. The provisions of this manual do not appear to take exception to quality assurance provisions defined in other program procedures.

e. Licensee Auditing of Major Contractors

The inspector reviewed the following audit documentation packages:

- (1) GE Audit #7 including letters NC-0019, QA-750348 & 775, NMP2-1283 and QA-760039.
- (2) GE Audit #8 including letters QA-760035, QA-760037 and QA-760045.
- (3) S&W Boston Audit #16 including letters QA-750340, QA-750342, QA-750360, QA-750361, QA-760019, QA-760056, 9M-184, 9M-187, 9M-193, 791, 794, and nonconformance reports numbered NC-0070 and QD-0007 through QD-0011.



- (4) S&W field Audit #3 including letters QA-760007, QA-760048, and nonconformance reports numbered NC-0072 through NC-0077 and QD-0018 through QD-0025.

The inspector determined that audit plans and checklists were developed and qualified personnel participated in each audit. With the exception of the deficiency discussed in paragraph 5, the discrepancies that were identified in the individual working checklists were transcribed to the proper corrective action documents and applicable follow-up was performed. The checklists that were developed specifically for each audit appeared adequately comprehensive.

The inspector reviewed the audit schedule and the planned S&W audits nos. 17, 18, 19 and 20, S&W field audits nos. 3, 4, 5 and 6 and GE audits nos. 8, 9 and 10. The inspector found the audit schedule to be commensurate with the project status and that the scheduled audits were addressing appropriate functional areas.

f. Licensee Review of Construction Manager's Quality Program

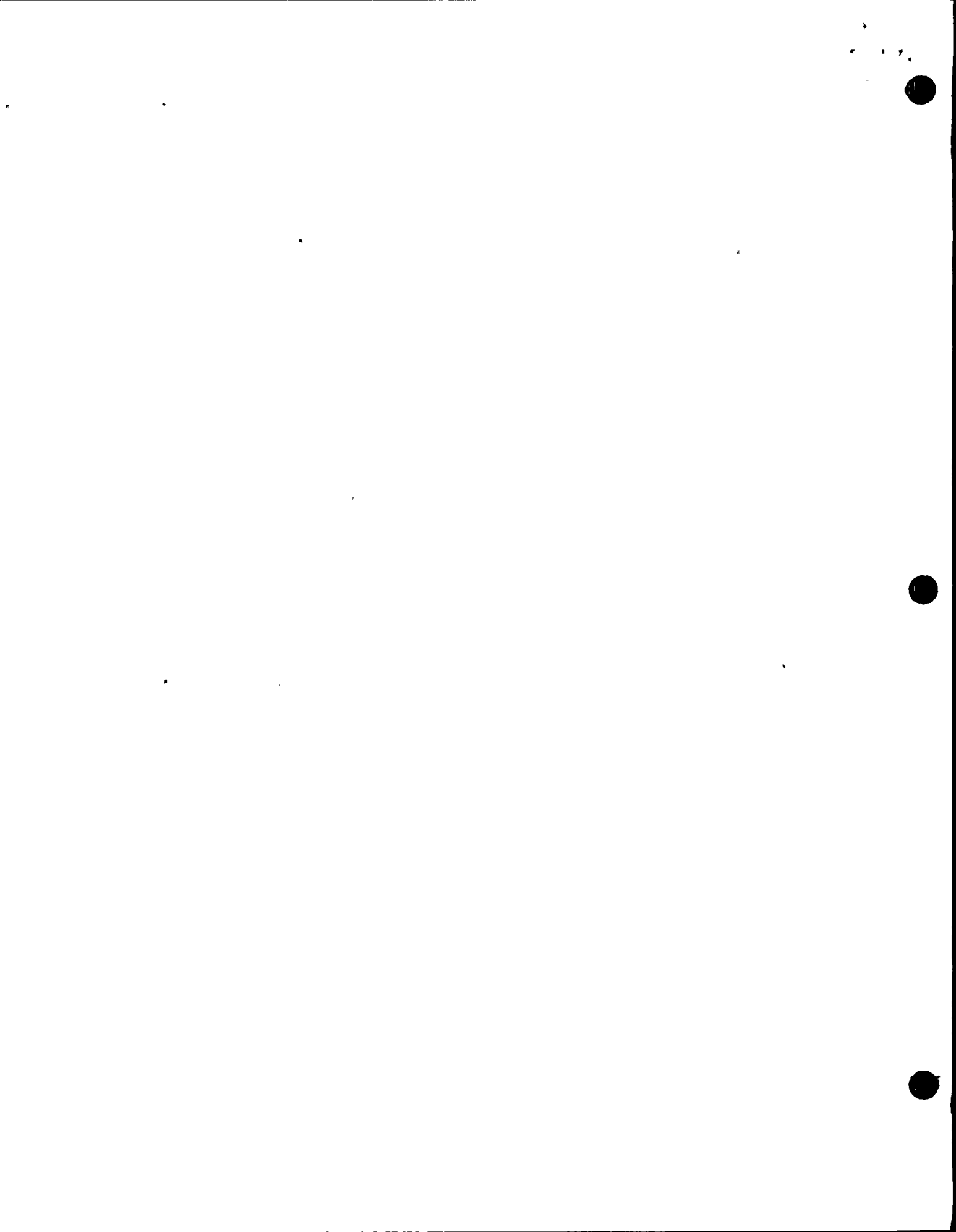
The inspector reviewed documentation package "S&W Topical Program Review," 3N2.2 M58.12 which indicated that the licensee had performed a specific point by point comparison between S&W's Topical Report SWSQAP 1-74 and the quality program committed to by the licensee. This review and subsequent follow-up actions resulted in a licensee approved S&W Nine Mile 2 Project Quality Assurance Manual. The evidence appears to assure the acceptability and applicability of this S&W quality assurance manual to this project.

g. Site Quality Assurance and Quality Control Organizations

(1) Staffing

The inspector reviewed the construction schedule, and the Construction Manager's site quality organization. The construction manager's senior site quality representatives stated that anticipated additions to their site staff within the next few months will be for Batch Plant, Concrete Placement, Rebar and Laboratory activities, consistent with the schedule for these activities.

The inspector reviewed the licensee's site quality organization and their activity schedule and the site staff of a subcontractor who was hired to provide geotechnical services including the monitoring of geological mapping performed by the construction manager.



It appears that current and planned site organizations' staffing are commensurate with the project status.

(2) Interviews

The inspector interviewed several site quality and geological personnel to ascertain that these individuals were familiar with and understood the applicable procedures/instructions relating to their assigned duties and responsibilities.

The areas discussed and the applicable procedures/instructions were:

- (a) Design Control - S&W procedure EAP 3.3, Establishment and Operation of a Field Extension Office (this procedure indicates that this activity is controlled by offsite personnel).
- (b) Procurement Document Control - S&W procedures QS 4.1, Procurement Document Control (Site) and FN2-S6.1-010, Document and Document Change Control.
- (c) Control of Site Initiated Purchase Material, Equipment and Services - S&W procedure QS 4.1, Procurement Document Control (Site).
- (d) Control of Special Processes - S&W procedures QS 10.12, Mixing and Delivering Concrete, FN2-D11.1-010, Concrete and Soils, FN2-S9.11-010, Cadwelding (Structural) and D&M's Project Plan, Blast Vibration Monitoring.
- (e) Inspection - S&W procedures QS 7.1, Receiving inspection, QS7.8, Nuclear Steam Supply System Supplier Quality Assurance interface and FN2-D14.3-010, Site Generated Attribute Lists.
- (f) Test Control - S&W procedure QS 11.11, Testing of Concrete.
- (g) Inspection Test and Operating Status - S&W procedure QS 14.2, Inspection Report System.
- (h) Nonconforming Materials, Parts and Components - S&W procedures QS 15.1, Nonconformance and disposition report field quality control, QS 15.3, Risk release of unsatisfactory/nonconforming material/equipment and 15.1-001, Addition Distribution of N&D's.



- (1) Audits - NMPC procedures QAP 1.01, Quality Assurance Organization for Nuclear Projects - Design and Construction Phase, QAP 1.10, Responsibilities, authorities and duties of Quality Assurance Group Personnel and QAP 18.10, Quality Assurance Audits by NMPC Personnel.

The individuals concerned exhibited a working knowledge of the applicable procedures.

