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

APR 3 0 1975

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. 75-01  
50-410

Gentlemen:

This refers to the inspection conducted by Mr. Toth of this office on April 16 and 17, 1975 of activities authorized by NRC License No. CPPR-112 and to the discussions of our findings held by Mr. Toth with Mr. Dize of your staff at the conclusion of the inspection.

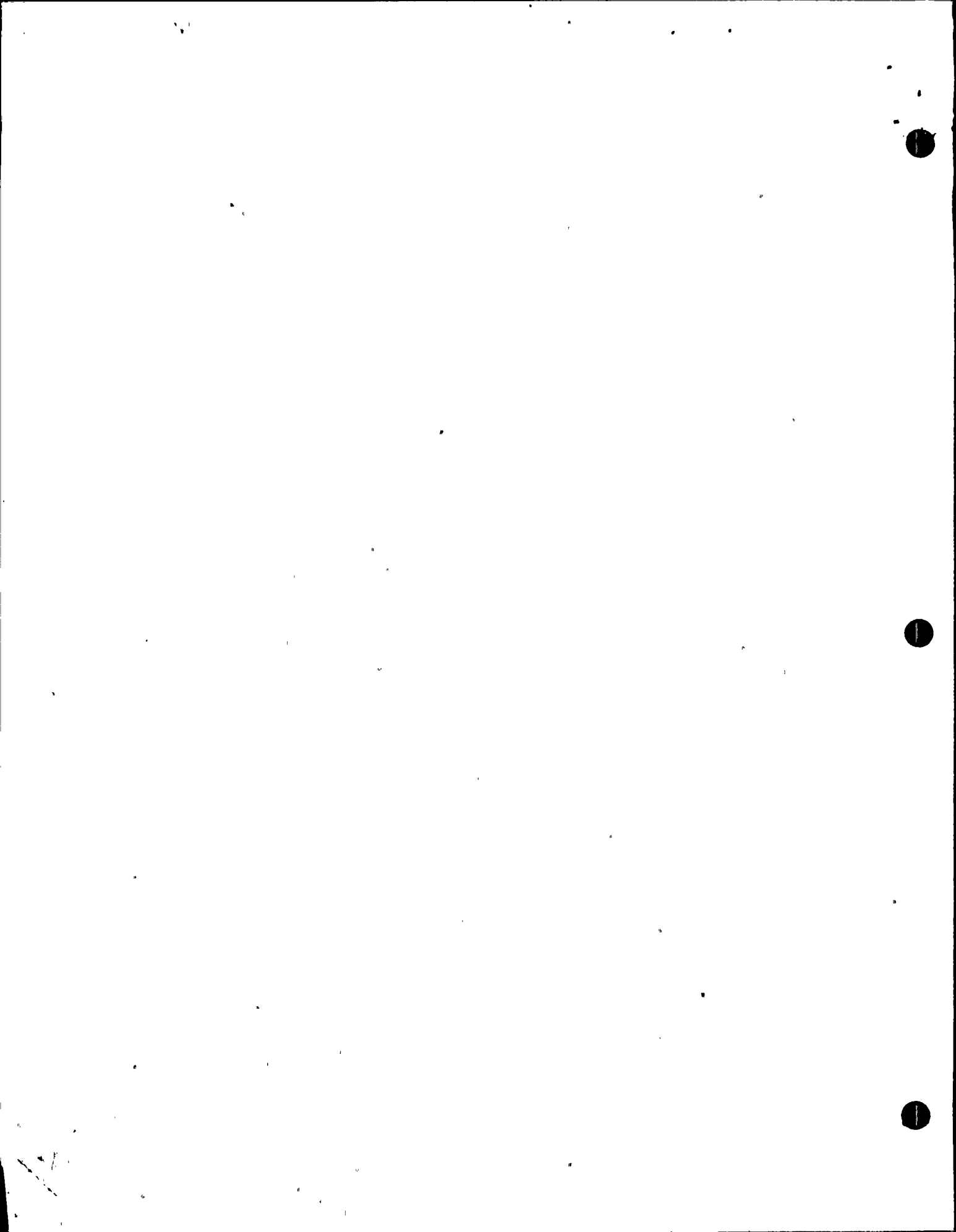
Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations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

Within the scope of this inspection, no items of noncompliance were observed.

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 enclosed inspection report 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.



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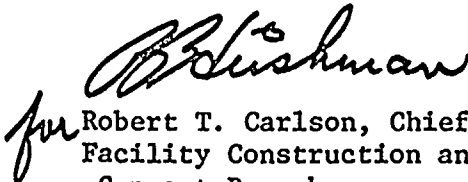


Niagara Mohawk Power Corporation

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No reply to this letter is required; however, should you have any questions concerning this inspection, we will be pleased to discuss them with you.

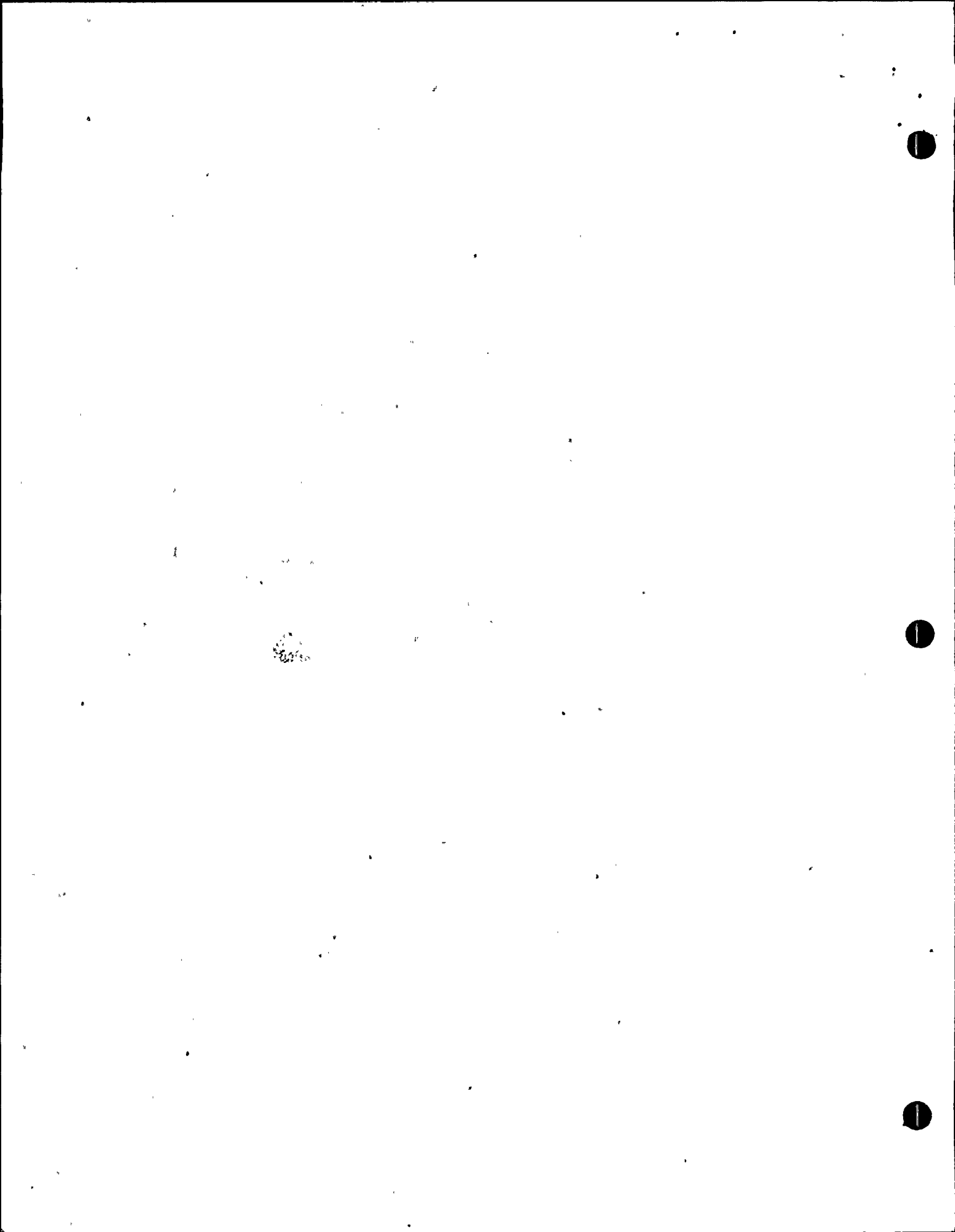
Sincerely,

  
for Robert T. Carlson, Chief  
Facility Construction and Engineering  
Support Branch

Enclosure:  
IE Inspection Report No. 75-01

cc: Eugene B. Thomas, Jr., Esquire

bcc: (w/encls)  
IE Chief, FS&EB  
IE:HQ (5)  
DL (4 w/encls, plus 9 cys report only)  
DR Central Files  
RS (3)  
PDR  
Local PDR  
IE Files  
NSIC  
TIC  
REG:I Reading Room  
ELD  
State of New York



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

IE Inspection Report No: 50-410/75-01

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  
Scriba, New York

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

Type of Licensee: BWR, 1100 MWe (GE)

Type of Inspection: Routine, Announced

Dates of Inspection: April 16, 17, 1975

Dates of Previous Inspection: September 26-27, 1974

Reporting Inspector: A. D. Toth

A. D. Toth, Reactor Inspector

4/29/75

Date

Accompanying Inspectors: William M Hayward

W. M. Hayward, Reactor Inspector

April 29, 1975

Date

Date

Date

Date

Other Accompanying Personnel: NONE

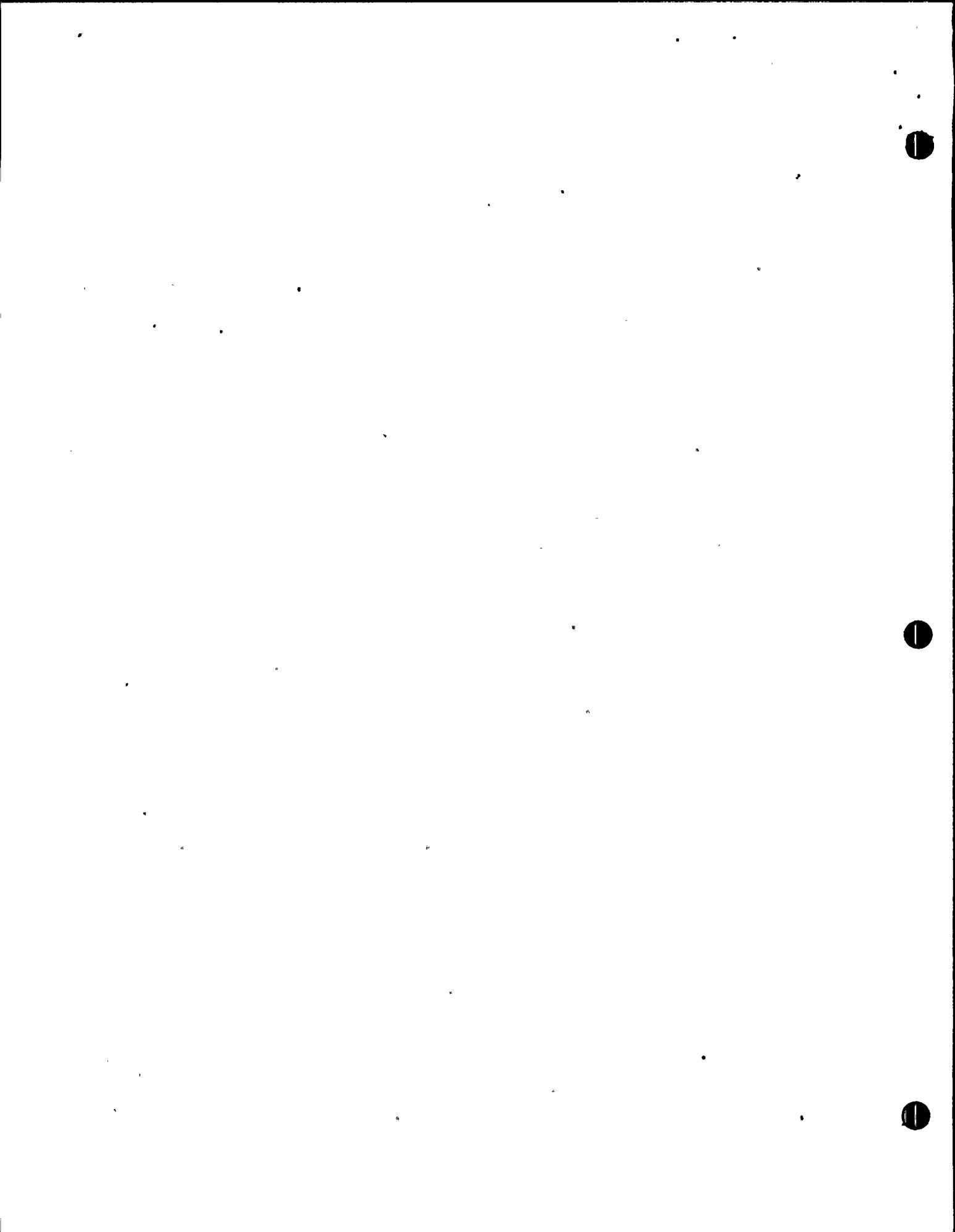
Date

Reviewed By: R. F. Heishman

R. F. Heishman, Senior Reactor Inspector

4/30/75

Date



SUMMARY OF FINDINGS

Enforcement Action

A. Items of Noncompliance

None

B. Deviations

None

Licensee Action on Previously Identified Enforcement Items

A. Items of Noncompliance

None

B. Deviations

None

Design Changes

None

Unusual Occurrences

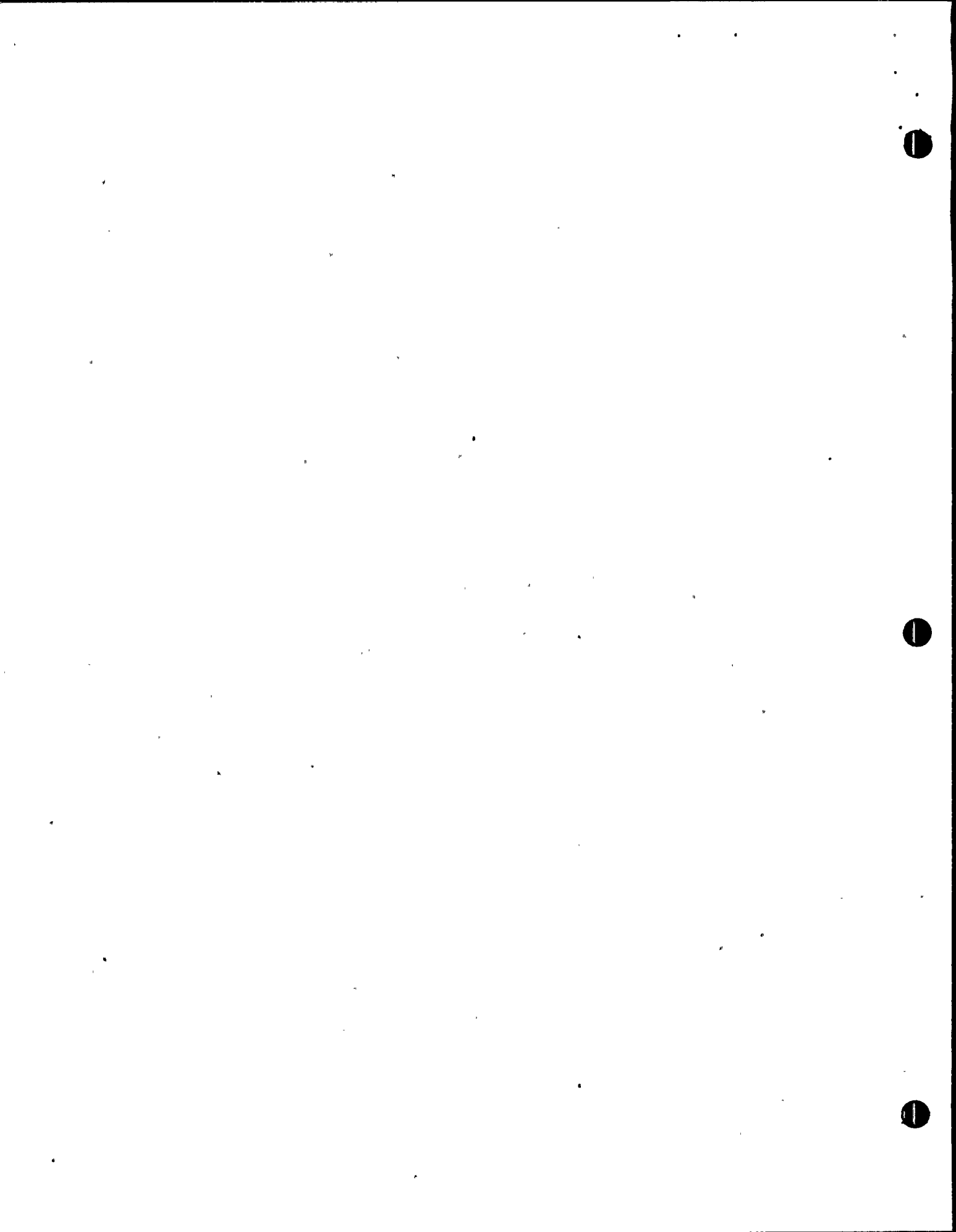
None

Other Significant Findings

A. Current Findings

1. Acceptable Items

- a. NMPC quality organization manpower levels were found to be adequate to accomplish scheduled tasks.
- b. NMPC quality organization planning and preparation was found to be current with project status and schedule.





- c. Long lead time NMPC provisions for ASME Section XI requirements were observed to be implemented on timely basis.
- d. The NMPC audit activity was found to be planned and executed according to written controls and performed on schedule.
- e. NMPC provisions for and use of required written controls over QA program activities was found to be consistent with project schedule.
- f. The NMPC QA Training Program was observed to be presented on schedule in compliance with written controls.

Details, Paragraph 10a thru f respectively.

2. Unresolved Items

None

B. Status of Previously Identified Unresolved Items

1. Responsibility for the QA Program

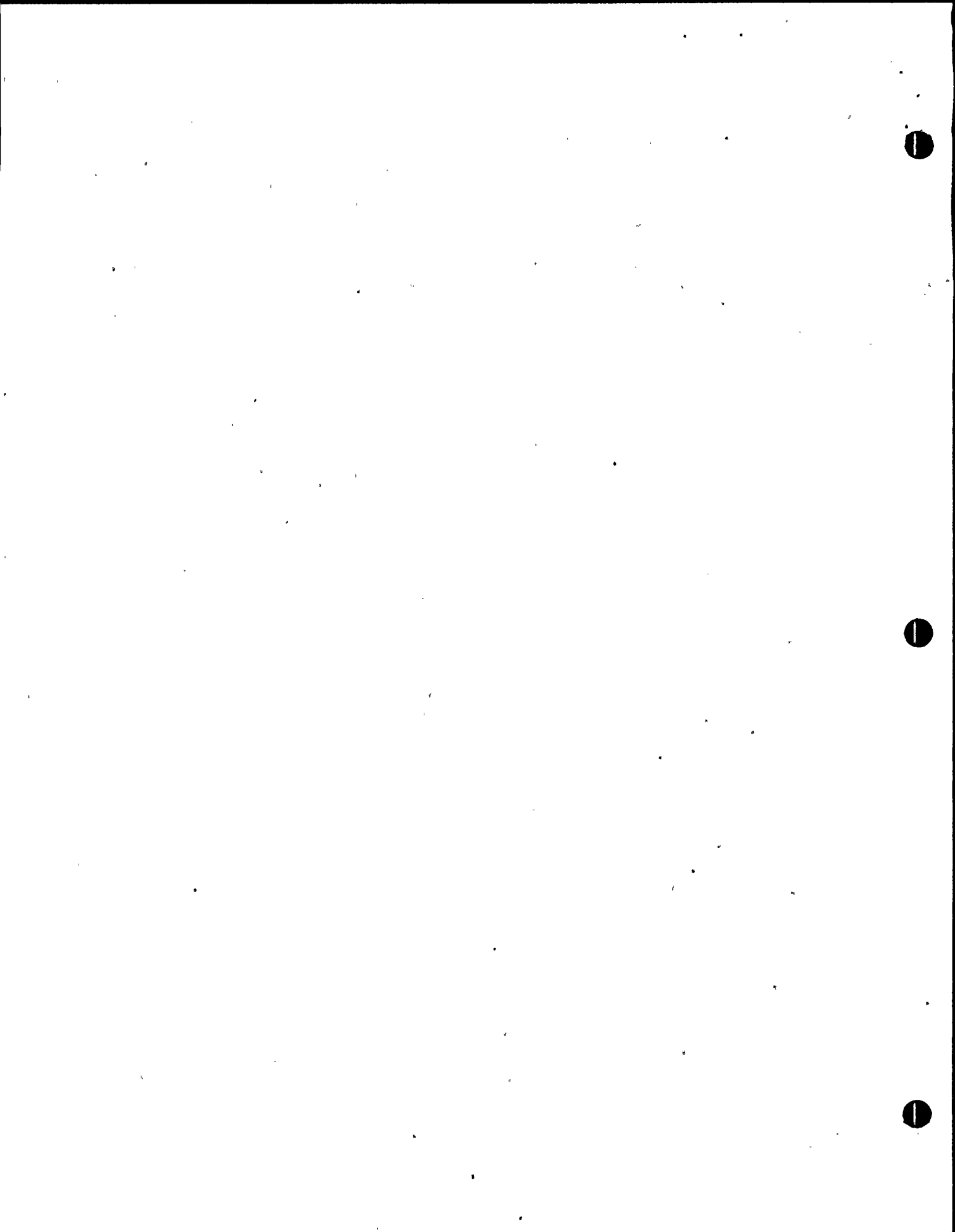
The licensee has effected corrective action on the audit non-conformance involving contractor utilization of unapproved procedures. This resolves item number 5 of the Details section of IE Inspection Report No. 50-410/74-01. (Details, Paragraph 5)

2. Procurement Surveillance Procedures

The licensee has taken action to assure that contractor vendor surveillance procedures are adequate, and has demonstrated plans to continue such actions. This resolves item number 6 of the Details section of IE Inspection Report No. 50-410/74-01. (Details, Paragraph 6)

3. Project Interface Agreement

An approved copy of the project interface agreement is maintained in the project procedures Manual. This resolves item number 8 of the Details section of IE Inspection Report No. 50-410/74-01. (Details, Paragraph 8)



4. Review of Contractor QA Manuals

The procedure for licensee review of contractor QA manuals has been revised to address the criteria of Appendix B of 10 CFR 50. This resolves item number 9 of the Details section of IE Inspection Report No. 50-410/74-01. (Details, Paragraph 9)

5. Construction Surveillance Procedures - Contractor

Site related construction surveillance procedures have been provided to the licensee and are undergoing review in accordance with licensee checklists corresponding to Appendix B of 10 CFR 50. Pending subsequent IE review, Item No. 7 of the Details Section of IE Inspection Report No. 50-410/74-01 is still unresolved. (Details, Paragraph 7)

6. Construction Surveillance Procedures - Licensee

The licensee construction surveillance procedures are still incomplete. Pending completion and subsequent IE review, Item Number 4-6 of the Details section of IE Inspection Report No. 50-410/74-01 is still unresolved. (Details, Paragraph 4)

Management Interview

At the conclusion of the inspection a meeting was held at the corporate office by the inspector with the following personnel to discuss the inspection findings:

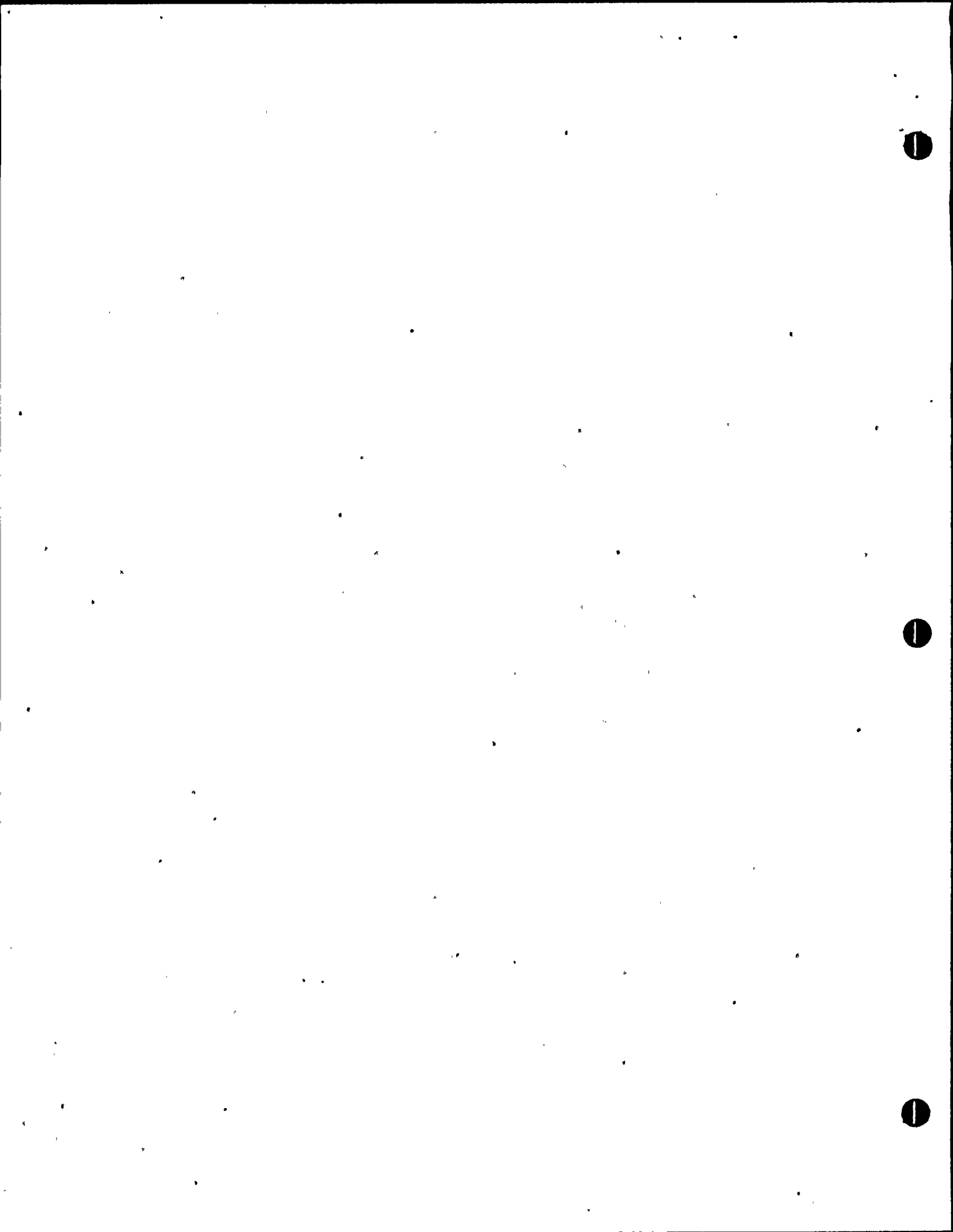
Niagara Mohawk Power Corporation

D. P. Dise, Manager, Quality Assurance  
R. A. Dowd, Supervisor, Quality Assurance  
J. J. Bebko, Quality Assurance Engineer

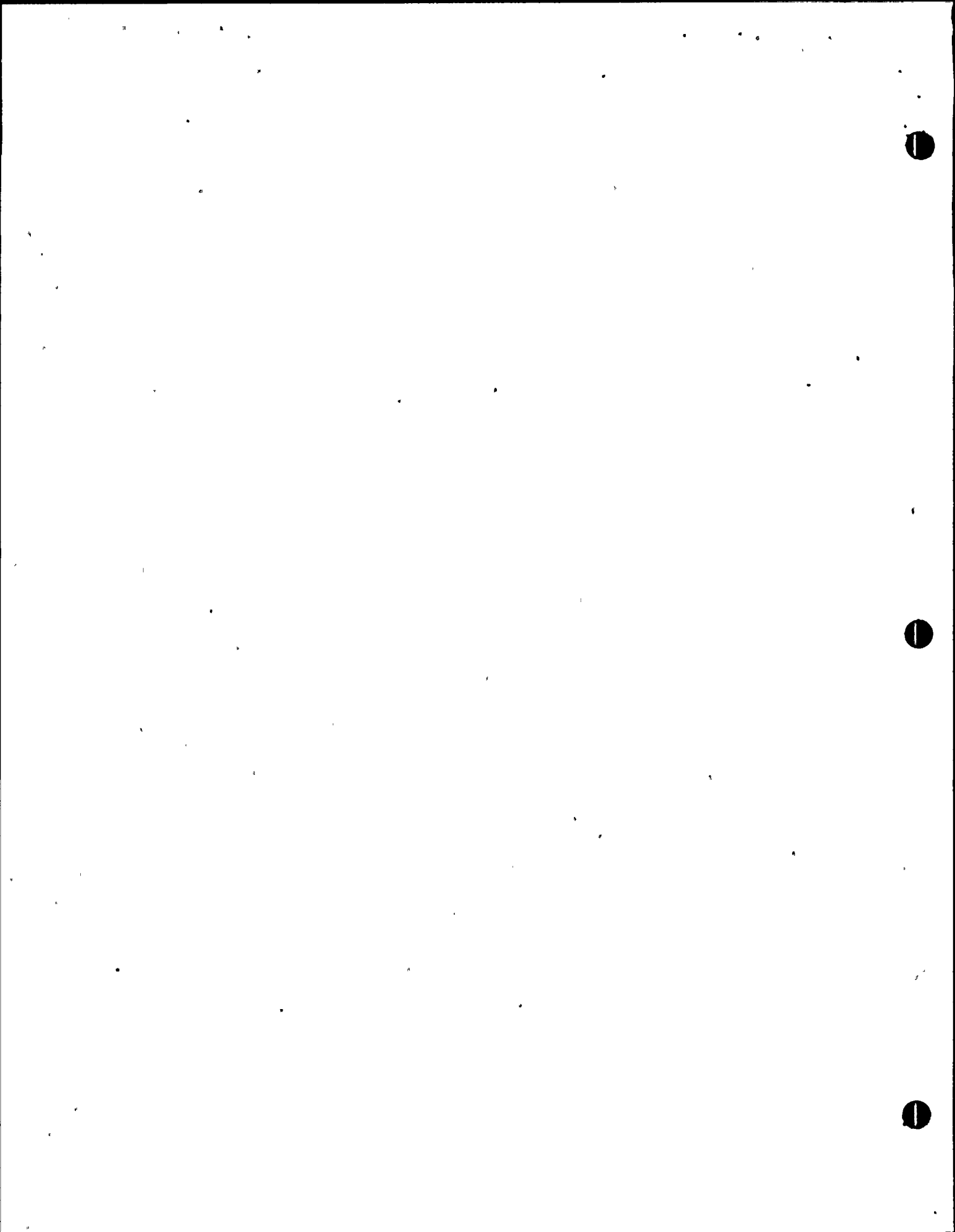
Stone and Webster Engineering Corporation

A. E. Little, Project Quality Assurance Coordinator

The following inspection findings were presented by the inspector, and were acknowledged by the licensee representative:



- A. The principal scope of the inspection included review of project and QA program status and current implementation of the program on ongoing activities. (Details, Paragraph 2)
- B. Specific areas were examined and are considered acceptable as noted under "Current Findings". (Details, Paragraph 10)
- C. Licensee resolution of four items was verified as noted under "Current Findings" and these items are now considered acceptable. (Details, Paragraphs 5, 6, 8, 9)
- D. Licensee action on two previously identified unresolved items was inspected and have been identified as not yet fully resolved. (Details, Paragraphs 4 and 7)



## DETAILS

### 1. Persons Contacted

#### Niagara Mohawk Power Corporation (NMPC)

D. P. Dise, Manager, Quality Assurance  
R. A. Dowd, Supervisor, Quality Assurance  
J. J. Bebko, Quality Assurance Engineer

#### Stone and Webster Engineering Corporation

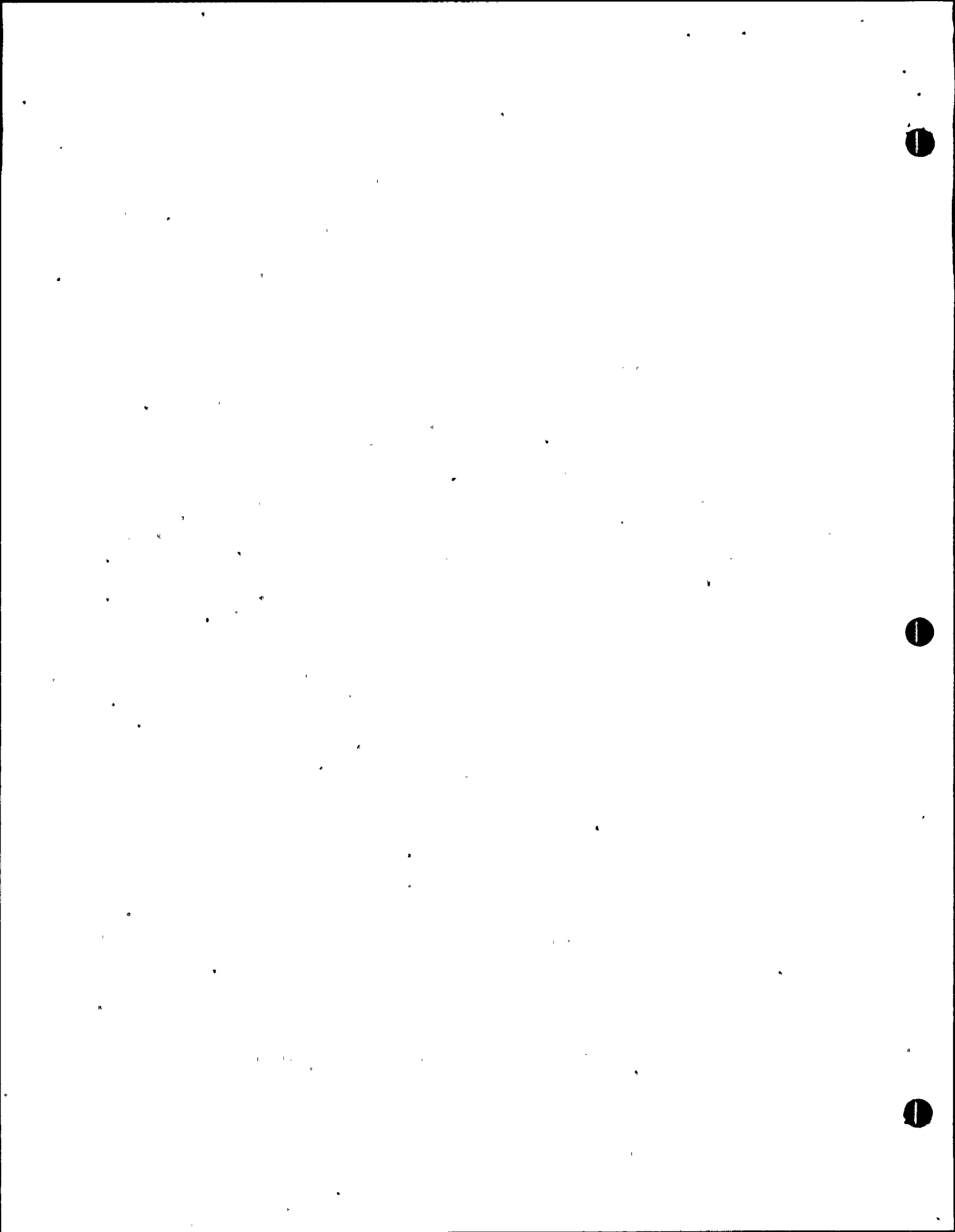
A. E. Little, Project Quality Assurance Coordinator

### 2. Inspection Objective

This inspection was to assess the continued development and implementation of the quality assurance program commensurate with project status. It was to determine project status, status of resolution of previously identified unresolved items, and effectiveness of implementation of those site related portions of the program where applicable.

### 3. Status of Project

- a. Site preparation or other construction related site activities have not been started. The licensee stated that such activities will not commence before calendar year 1976, and a more definitive schedule will be available on or about July 15, 1975. The licensee stated that a revised commercial operation date will be provided to NRC in the July 15, 1975 quarterly report. The licensee stated that a March 18, 1975 letter was sent to the Federal Power Commission stating that production from this facility will not be required prior to 1982.
- b. Certain NSSS supplied components have been ordered and released for shop fabrication. The licensee stated that no safety-related balance-of-plant components have been released for shop fabrication.
- c. The licensee stated that design status has changed little from that reported in September, 1974 and percentage progress is about the same, engineering 70%, detailed design 45%. As of the date of the inspection, no systems have completed the design review cycle specified in PSAR Section D-8 and Project Procedure No. 7.





- d. The inspector provided the licensee with excerpts from Section 4 of the USNRC monthly "Status Summary Report - Construction Status of Nuclear Power Plants" (commonly referred to as the "yellow book"), including sample typical network chart worksheets. The construction reporting needs were briefly discussed, however, detailed discussions were deferred in view of the currently undefined construction start date.

4. Status of the QA Program

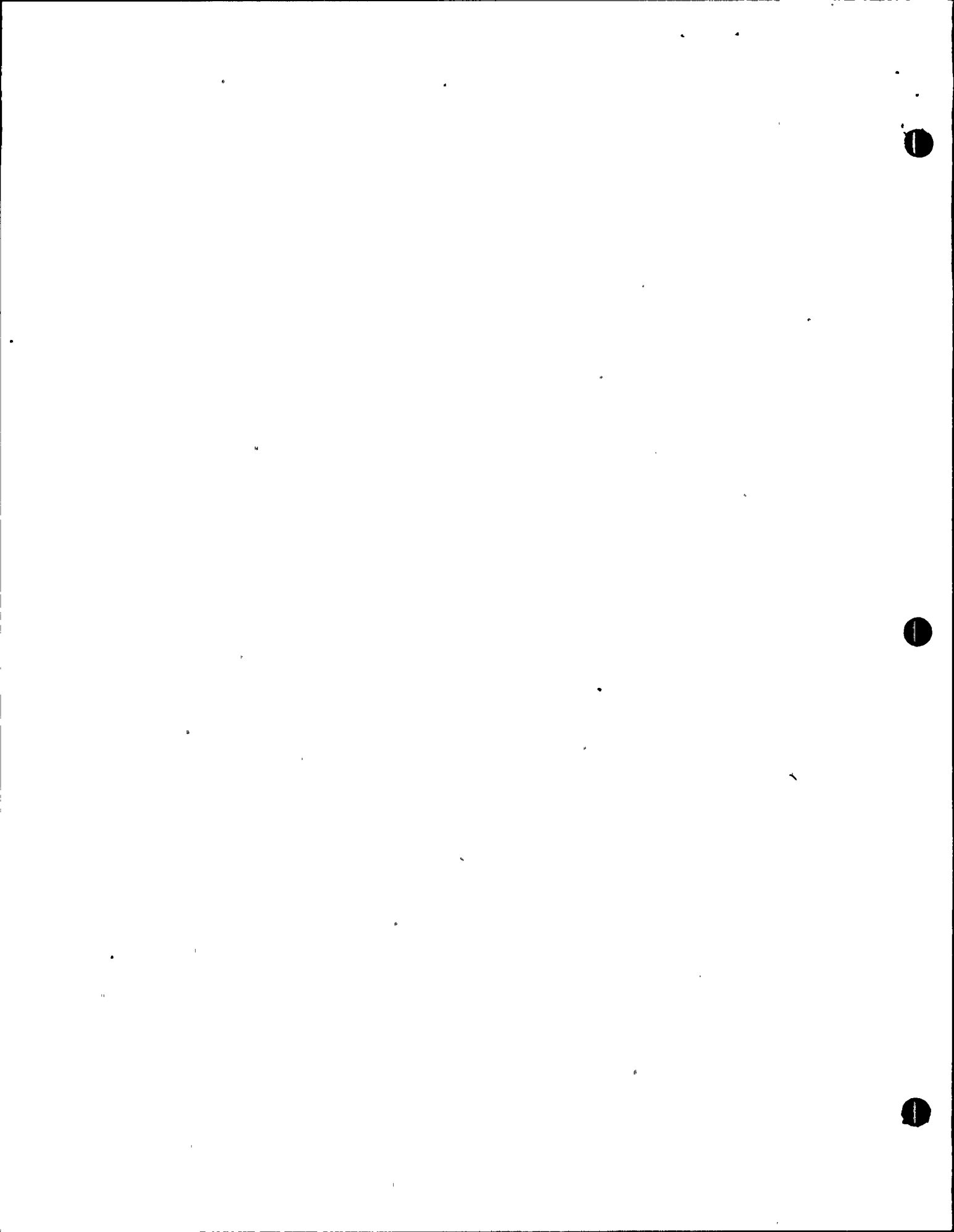
The licensee construction surveillance procedures are still incomplete. Thus, item number 4.c of the Details section of IE Inspection Report No. 50-410/74-01 is still unresolved.

The inspector reviewed draft procedure QAP-18.11 which defines licensee field office site surveillance requirements. The procedure is not yet approved in that such approval is being withheld pending identification of the senior site QA Engineer and review of the procedure by him. The inspector noted that the draft procedure does not include definition of the detailed responsibilities relative to site related portions of the criteria of Appendix B of 10 CFR 50, such as the requirement for monthly audit of the site control of calibration and test equipment, as specified in PSAR Section D-23. The licensee stated that this aspect will be reviewed and resolved prior to approval of the procedure and start of construction.

5. Responsibility for the QA Program

The licensee has effected corrective action on the audit nonconformance involving contractor utilization of unapproved procedures. This resolves item number 5 of the Details section of IE Inspection Report No. 50-410/74-01.

The licensee has obtained controlled copies of the contractor detailed implementing procedures which the contractor plans to replace certain existing procedures. The licensee stated that as a result of audit finding NC-0058, Stone and Webster has discontinued unapproved use of the new Quality Standards and Quality Assurance Directives on this project, and for ongoing procurement activities



has reverted back to the existing Procurement Quality Control Manual. The licensee stated that the Procurement Quality Control Manual will be replaced on a formal basis on or about May 15. The licensee stated that he expects to receive changes to the new standards and directives when these are issued for implementation, and that this will provide adequate timing for licensee review. The inspector reviewed the July 14, 1974 audit report which generated the audit finding NC-0058, and the followup correspondence of September 12, 1974 through February 3, 1975, including contractor requests for extension of time to respond and licensee concurrences. These records demonstrated licensee ability to effect corrective action on the item identified by the audit.

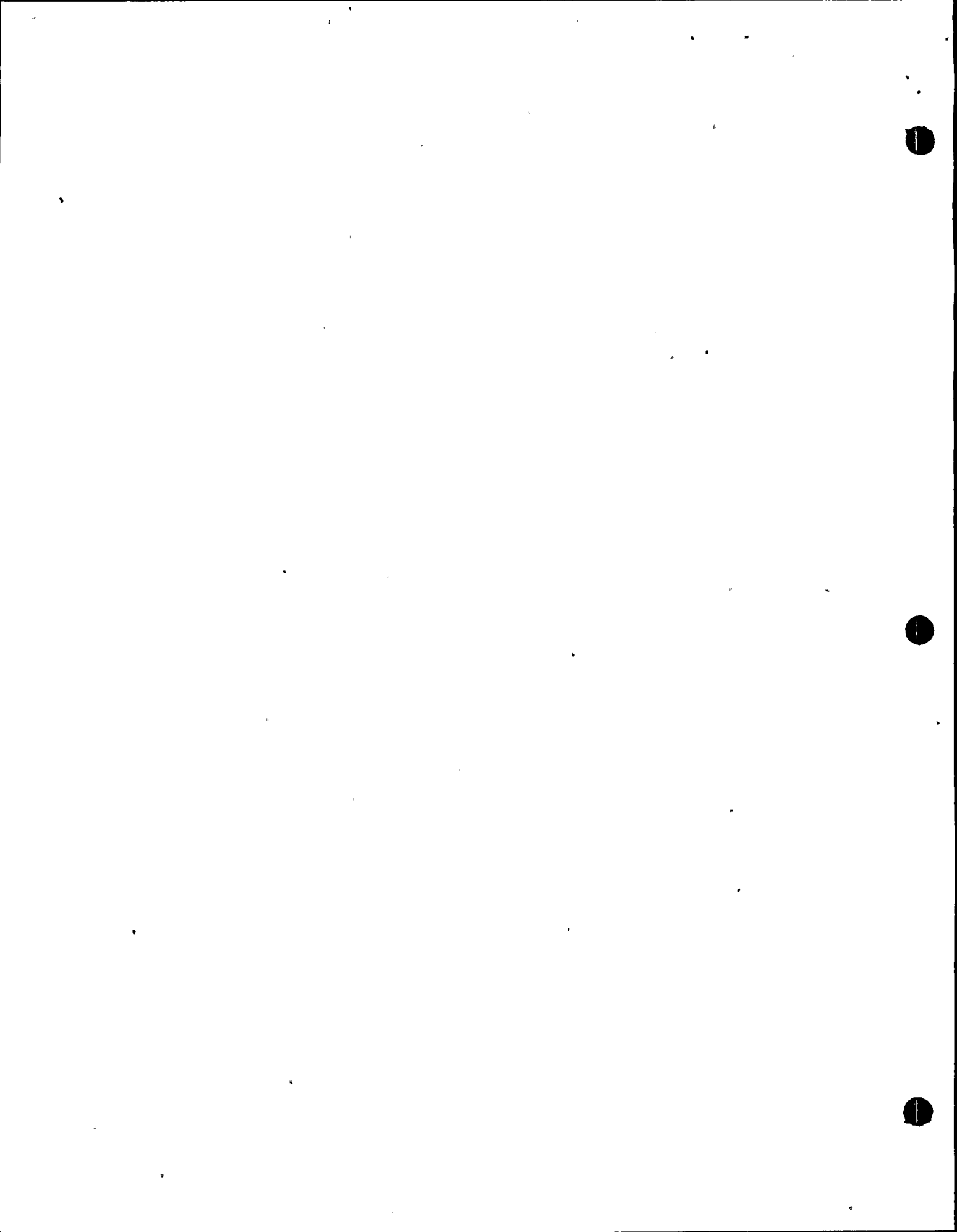
6. Procurement Surveillance Procedures

The licensee has taken action to assure that contractor vendor surveillance procedures are adequate, and has demonstrated plans to continue such actions. This resolves item number 6 of the Details section of IE Inspection Report No. 50-410/74-01.

The inspector observed contractor procedure QAD-18.11 "Audit of Vendor Programs" currently under review by the licensee, and he noted that QAD-7.1 "Vendor Shop Inspection" is included on the list of procedures yet to be prepared by the contractor. The licensee stated that except for NSSS supplied items, no safety related components have been released for shop fabrication such as to require QAD-7.1. The licensee noted that since contractor action was taken on audit finding NC-0058, other procurement activities have been conducted in accordance with the previously approved Procurement Quality Control Manuals; however, that Manual is planned to be replaced by the new Quality Standards/Quality Assurance Directives System by May 15, 1975.

The inspector also noted licensee procedure QAP-7-10, which the licensee stated is patterned after the contractor procedure QAD-18.11, and which the licensee plans to use to perform his own shop inspection on selected non-safety related items in order to test the effectiveness of the contractor procedure.

The adequacy of vendor surveillance procedures is being reviewed by NRC under the vendor inspection program. Licensee action to assure adequacy of those procedures is considered acceptable.



7. Construction Surveillance Procedures

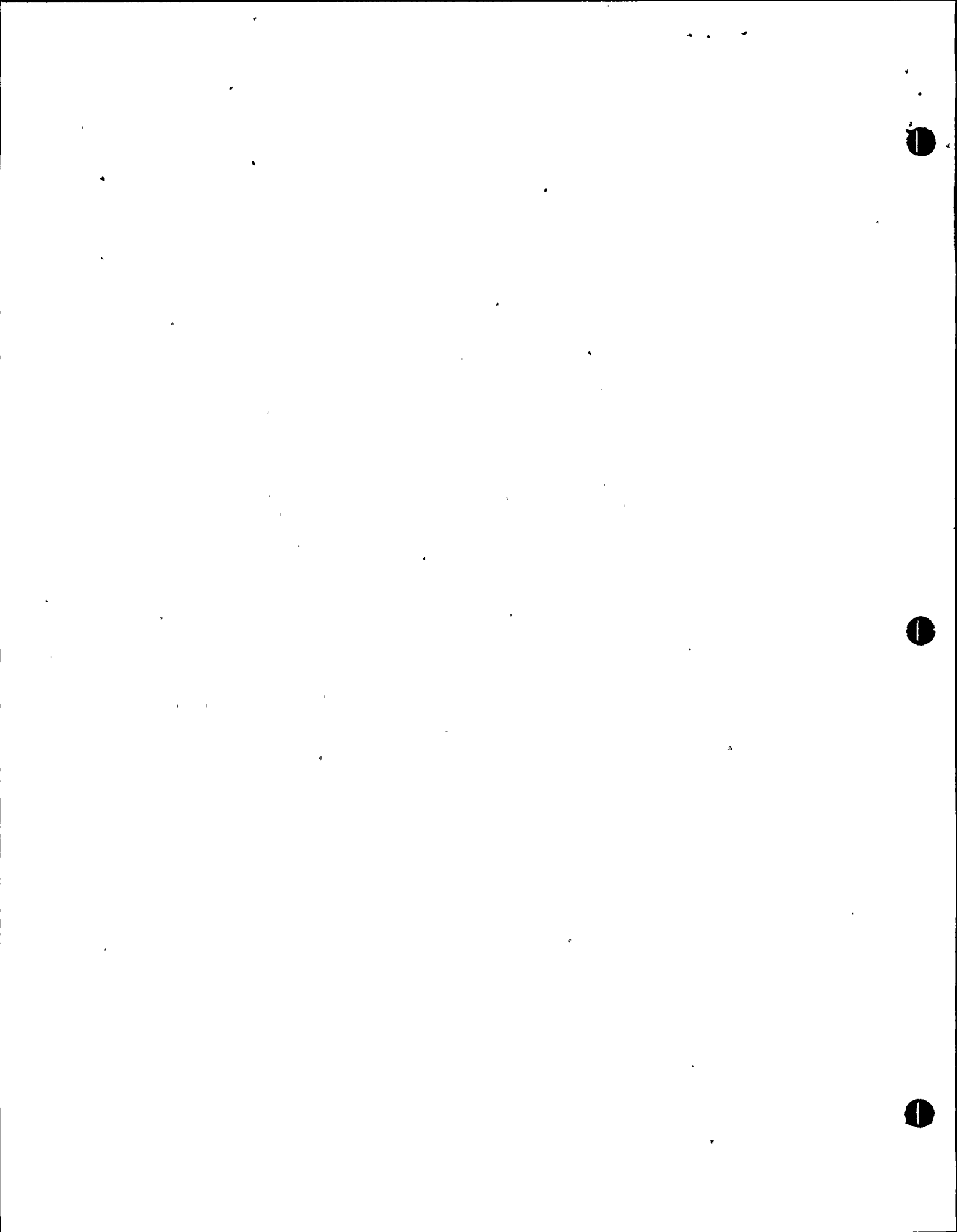
Site related construction surveillance procedures have been provided to the licensee and are undergoing review in accordance with licensee checklists corresponding to Appendix B of 10 CFR 50.

The inspector reviewed the licensee checklist for verifying that contractor construction surveillance procedures adhere to 10 CFR 50, Appendix B criteria; the checklist consists of the NRC Licensing standard review plan for PSAR QA Programs. The inspector observed the specific contractor procedures mentioned by the licensee, but unavailable at the previous inspection. QS-8.12 dated November 27, 1974 defines identification and control of materials and traceability of items. QS-12.1 dated May 24, 1974 defines a site calibration and test system, including control of standards and maintaining calibration status. QS-13.12 dated August 27, 1974 defines Material and Equipment Preventative Maintenance, QS-13.1 dated September 16, 1974 defines Handling and Rigging requirements, and QS-13.11 dated August 30, 1974 defines Material and Equipment Storage Levels.

The inspector reviewed a list of Quality Standards and Quality Assurance Directives which are yet to be prepared by Stone and Webster. The inspector also reviewed a licensee developed matrix of existing and planned new procedures, standards and directives as relate to criteria of Appendix B of 10 CFR 50, a matrix of new Quality Standards and Directives as relate to the Field Inspection Manual previously reviewed by the licensee, and a April 11, 1975 licensee QA Department Instruction to review the contractor QA standards and directives for compliance with Appendix B of 10 CFR 50 and also any additional specific criteria specified in the PSAR for this project.

The licensee stated that non-destructive testing related Quality Standards and Quality Assurance Directives are expected to be completed by the contractor by June 15, 1975. The Field Inspection Manual previously approved by the licensee is also expected to be replaced by Quality Standards and Directives, and although many of these are prepared others are scheduled and remain to be reviewed by the licensee.

Since the new contractor-site-related procedures have not yet been reviewed by the licensee, and since construction is not scheduled prior to 1976, the inspector deferred further review of the site



procedures until a future inspection. This item No. 7 of the Details section of IE Inspection Report No. 50-410/74-01 is thus still unresolved.

8. Project Interface Agreement

An approved copy of the project interface agreement is maintained in the project procedures manual. This resolves item number 8 of the Details section of IE Inspection Report No. 50-410/74-01.

The inspector examined the Project Procedure No. 8, Revision 2 dated February 5, 1975, which consists of the "Work Control Procedures between NMPC, GE-NED and S&W". The document now contained the appropriate approval signatures and was filed in the project manual in accordance with Project Procedure No. 13. The inspector reviewed Procedure No. 13 dated November 5, 1974 and observed that it provides for distribution of revised project procedures and assigns responsibility to file changes and dispose of superceded documents.

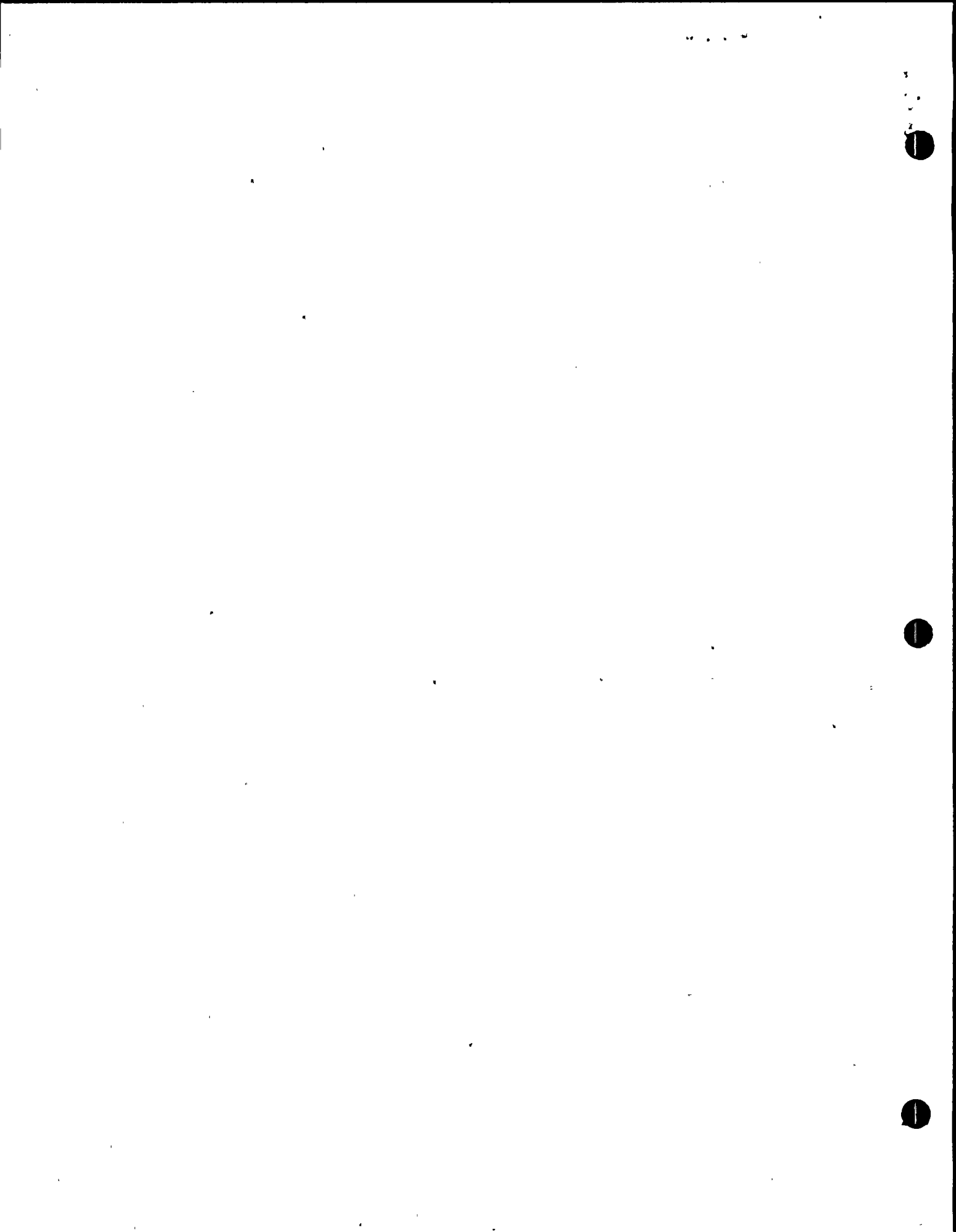
9. Review of Contractor QA Manuals

The procedure for licensee review of contractor QA manuals has been revised to address the criteria of Appendix B of 10 CFR 50. This resolves item number 9 of the Details section of IE Inspection Report No. 50-410/74-10.

The inspector examined Procedure QAP-4.25, Revision 1 dated January 1, 1975, which in Part 5-2 references the criteria of Appendix B of 10 CFR 50 and which requires preparation of checklists for performance of review of contractor QA manuals. The inspector also examined the checklist currently being used in the review of the constructor's QA Manuals. The checklist was patterned after the NRC Licensing "Standard Review Plan for PSAR QA Programs Content". An April 11, 1975 instruction to the QA staff requires that the checklist be utilized in the ongoing NMPC review of the constructor's quality assurance standards and directives.

10. Acceptable Items

- a. Niagara Mohawk Power Corporation (NMPC) quality organization manpower availability projections, for the remainder of calendar year 1975, were examined. An average of 5 man years per year were provided, with additional assistance available from engineering and science discipline organizations in NMPC. The degree of support is considered acceptable to accomplish the quality tasks scheduled in the modified project program.





- b. The NMPC quality organization was found to be planning and preparing verification activities according to an NMPC supplied procurement activity schedule which is provided at bi-weekly intervals.

NMPC audit and surveillance activity was demonstrated to be scheduled effectively in agreement with the procurement activity schedule.

- c. ASME Section XI requirements were observed to be provided for, and attention was found to be given by NMPC to assuring that the specified NDE samples are provided.
- d. The NMPC audit schedule was found to be planned on a quarterly basis with projections having been observed to provide 8 audits through calendar year 1975. Audits were found to be performed against written procedures and line item type checklists. Reports were found to evaluate findings versus the line item criteria. Some audits were observed to have been "slipped", but were rescheduled for subsequent performance in observance of the modified project schedule. Areas of audit included Design and Procurement activities and control.
- e. NMPC control over and provisions of quality affecting instructions, procedures and drawings was found to be timely and responsive to the project status and quality affecting activities in the project schedule.
- f. The inspector observed that one of the NMPC QA personnel was assigned to and was presenting a training program to quality organization personnel. The training was observed to have been presented per schedule.

