

September 28, 1978

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

RE: Docket No. 50-220
Inspection Report 78-11

Dear Mr. Brunner:

This refers to the inspection conducted by Mr. D. Beckman and Mr. G. Napuda of your office on August 14-18, 1978 at the Nine Mile Point Nuclear Station Unit #1, and at the Niagara Mohawk offices in Syracuse, New York. We herewith submit the following responses to Items A through D of Appendix A to the subject inspection report:

RESPONSE TO ITEM A

- The two Quality Assurance Manuals, i.e., Quality Assurance for Nuclear Reactors and Associated Electrical Generating Facilities Operatings Phase, and
- Quality Assurance Manual for Nuclear Reactors and Associated Generating Facilities - Design and Construction

have been recently reviewed against the FSAR, Supplement 12. As a result of this review, it has been concluded that the FSAR Supplement 12 adequately covers the NMPC Quality Program and requires no embellishment through references to the above two manuals.

Corrective Action to be taken includes the preparation and issue to Division of Reactor Regulation, an appropriate letter-revision to the FSAR, Supplement 12, which will upon acceptance, delete references to the two manuals. The letter-revision to the FSAR will be issued by January 1, 1979. The requirement for the three year review and re-issue of the Quality Assurance Manual, which was the substance of the infraction, will be eliminated. However, NMPC re-affirms its intent to fully comply with 10 CFR 50, Appendix B, Criterion II by completion of the two-year cycle evaluation in accordance with the current FSAR Supplement 12.

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RESPONSE TO ITEM A (continued)

- Most of the Quality Control Manual for Nine Mile Point Nuclear Site Operating Phase (Policy/Program Portion) has been superseded through incorporation of its content into the Quality Assurance Procedures. These procedures will, when complete, describe the policy/program for Unit #1. Consequently, the manual is currently under active review.

Corrective action for this portion of Item A includes the updating and incorporation of the policy/program content into the Quality Assurance Procedures. The review and revision will be completed by January 1, 1979. Subsequent review of the Quality Control Program will be accomplished during the two-year cycle evaluations.

RESPONSE TO ITEM B

The Deficiency Audit for the Safety Review and Audit Board is normally conducted during June and December of each year. This was done for the years 1975 and 1976. The planned June Audit for 1977 was delayed until July 28, 1977 to accommodate an in-progress outage at the station. It was felt that a more meaningful audit would result when the station staff was relieved of the pressure of outage activities.

The planned December 1977 Audit was delayed until January 4, 1978 because of conflicting holiday vacations of the auditors and the station staff. Again, it was felt that a more meaningful audit would result from working with the proper station personnel when available.

One additional Deficiency Audit has already been performed in 1978 with a third scheduled for December 1978. It should be noted that the same number of audits already have been performed in 1977-1978 that would have been done if the June and December schedule had been met. It should also be noted that the second Deficiency Audit slipped only four days past the end of the calendar year.

To assure close adherence to audit schedules in the future, the Safety Review & Audit Board secretary shall maintain a schedule of audits and issue timely reminders of audits due. Any necessary deviations from schedule will be explained in the SRAB minutes.

RESPONSE TO ITEM C

The 1977 Audit of Staffing, Training and Maintaining Exposures as Low as Practicable was completed by a consultant to Niagara Mohawk in March 1978. Immediately subsequent to conducting the audit, the auditor was transferred to another location by his company. During the process of that transfer, the notes of the audit were misplaced. These have been located and the report is currently being written.

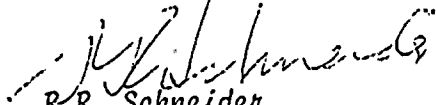
To assure timely completion of audit reports in the future, the SRAB secretary will record the date of the audit in the SRAB minutes and give the auditor a timely reminder of the date due for his report.



RESPONSE TO ITEM D

Additional clerical help was made available to the Quality Control-Operations group to help insure that deficiencies of this type will not recur. Quality Control-Operations group personnel have been re-indoctrinated with the necessity of completing the audit reports within the thirty working days prescribed by the procedures, or of documenting the reason for inability to comply with the procedure. A simplified audit reporting system has been implemented which should also enhance the ease of accomplishing timely audit reporting.

Sincerely,



R.R. Schneider
Vice President -
Electric Production

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