

8 SEP 1978

APPENDIX A

NOTICE OF VIOLATION

Niagara Mohawk Power Corporation

Docket No. 50-220

Based on the results of an NRC inspection conducted on August 14-18, 1978, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Facility License No. DPR-63, as indicated below. Items A and B are Infractions; items C and D are Deficiencies.

- A. 10 CFR 50, Appendix B, Criterion II states in part, "The applicant shall regularly review the status and adequacy of the quality assurance program." The accepted Operational Quality Assurance Program (FSAR Supplement 12), Section II, Paragraph 2.3 states in part, "Management periodically assess the scope of the Quality Assurance Program through their review of the Quality Assurance policy manuals. It is required that any policy manual issued by the ... Quality Assurance organization be reviewed by the Manager-Quality Assurance and heads of all departments affected, in its entirety, at least once every three (3) years and reissued as a revised document...."

Contrary to the above, on August 18, 1978, it was determined that:

- Quality Assurance Manual for Nuclear Reactors and Associated Electric Generating Facilities-Operating Phase had not been reviewed nor reissued since December 1973;
 - Quality Assurance Manual for Nuclear Reactors and Associated Electric Generating Facilities-Design and Construction had not been reviewed nor reissued since October 1973; and,
 - Quality Control Manual for Nine Mile Point Nuclear Site-Operating Phase (policy/program portion) had not been reviewed nor reissued since July 1974.
- B. Technical Specification 6.5.2.8 states in part, "Audits of the facility activities shall be performed under the cognizance of the SRAB. These audits shall encompass: ... c. The results of all actions to correct deficiencies ... at least once per six months ..."

7810260025



Contrary to the above, during the calendar year 1977, the "Deficiency Audit" conducted under the cognizance of the SRAB was not conducted once per six months. A single Deficiency Audit was conducted July 28, 1977. The previous audit was conducted December 21, 1976.

- C. Technical Specification 6.5.2.8 states in part, "Audits ... shall be performed These audits shall encompass: ... b. The performance, training and qualification of the entire facility staff...." Technical Specification 6.5.2.10 states in part, "Records of SRAB activities shall be prepared ... and distributed as indicated below: ... c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded ... within 90 days after completion of the audit."

Contrary to the above, as of August 17, 1978, the "1977 Audit of Staffing, Training and Maintaining Exposures ALAP" completed in March 1978 has not been prepared and distributed within 90 days after the completion of the audit.

- D. 10 CFR 50, Appendix B, Criterion XVIII states in part, "A comprehensive system of planned and periodic audits shall be carried out ..." The accepted Operational Quality Assurance Program (FSAR, Supplement 12), Section I, Paragraph 1.8, states in part, "Those ... ANSI standards ... referenced in: ... WASH 1283 ... Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants dated May 24, 1974 ... are committed to by the Niagara Mohawk Power Corporation ... " ANSI N45.2.12, Draft 3, Revision 4, is referenced in WASH 1283. ANSI N45.2.12, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants, Section 4.4, states in part, " ... The audit report shall be issued within 30 days after the audit."

Contrary to the above, the below listed reports of audits conducted by the Quality Control-Operations group were not issued within 30 days after the audit.

Audit No.	Date Completed	Date Issued
77-2	May 27, 1977	August 3, 1977
77-3	August 12, 1977	October 18, 1977
77-4	September 9, 1977	November 30, 1977

