

September 11, 1979

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

50-220

RE: Docket No. 50-220  
Inspection Report 79-14

Dear Mr. Brunner:

This refers to the inspection conducted by Mr. R. Architzel of your office on May 2-4, 1979 at the Nine Mile Point Nuclear Station Unit #1. The following is submitted in response to the alleged infraction detailed in Appendix A of your letter dated August 21, 1979:

10 CFR, Appendix B, Criterion VI, Document Control, states in part: "Measures shall be established to control the issuance of documents such as instructions, procedures, and drawings, including changes thereto ... These measures shall assure that documents, including changes are ... used at the location where the prescribed activity is performed ..."

The accepted Quality Assurance Program, FSAR Twelfth Supplement states in Section VI: "The measures which control the issuance and revision of these documents require: ... (c) The distribution of controlled documents to the points of use. (d) The use of controlled documents to where the prescribed activity is carried out ... A minimum list of documents in a controlled status is as follows ... (e) Instruction and Operating Procedures ..."

Contrary to the above, measures were not effective in controlling the issuance and use of the operating procedures in that an outdated (undated) valve check off list was used on June 15, 1977 to perform a system line up on the Liquid Poison System. The approved valve line up for Operating Procedure N1-OP-12, Liquid Poison System, was dated March 13, 1975 and had not been utilized.

In addition, outdated (undated) blank Operating Procedure check lists were stockpiled in the Station Shift Supervisor's office on May 3, 1979, while the associated, approved check off lists were issued on various dates between 1975 and 1978.

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RESPONSE

The outdated valve check-off list for the Liquid Poison System as well as other outdated Operating Procedure check lists stockpiled in the Station Shift Supervisor's office were immediately removed upon discovery on May 3, 1979. It appears that these outdated lists were overlooked when procedure changes were instituted and therefore, not purged from the filing system. Personnel who are responsible for or who perform valve check-offs have been made aware of the use of outdated lists and have been instructed that henceforth any valve check lists used must be verified against the master copy located in the control room. Further, the procedures coordinator will include a verification of the proper check-off list during his periodic review of each operating procedure.

The corrective actions have been impletemented and therefore, full compliance has been achieved.

Very truly yours,

*Thomas E. Lempges*

Thomas E. Lempges  
General Superintendent  
Nuclear Generation

for  
R.R. Schneider  
Vice President -  
Electric Production

CLS/mtm