

November 5, 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

RE: Docket No. 50-220
Inspection Report 79-23

Dear Mr. Brunner:

This refers to the inspection conducted by Mr. P. Graham of your office on September 18-20, 1979, at the Nine Mile Point Nuclear Station Unit #1. The following is submitted in response to the alleged item of deficiency detailed in Appendix A of your letter dated October 15, 1979:

- A. Technical Specification 6.8.1 states, in part: "Written procedures and administrative policies shall be established, implemented and maintained..."

Contrary to the above, the following examples of failure to implement plant procedures were identified during this inspection.

1. On June 21, 1979, the technician performing procedure N1-RPSP-4 initialled for both the first and second verifications that the correct control rod was selected for movement which is in violation of the procedure. This discrepancy was not detected by supervisory review.
2. On June 22, 1979, the technician performing procedure N1-RAP-3 marked a step under the "Results" Section of the procedure as "Not Applicable", when in fact, the step was applicable and should have been completed. This discrepancy was not detected by supervisory review.
3. On July 3, 1979, the technician performing procedure N1-RPSP-3 completed step 4.a.1 even though plant conditions specified in the step did not exist. In addition, the rod sequence was not identified on the data form as is required. This discrepancy was not detected by supervisory review.



Handwritten marks or scribbles in the top right corner.

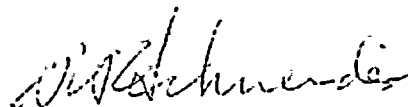
RESPONSE

Deficiencies noted in Items A1 and A3 were corrected. After reviewing Item A2, it was discovered that the data sheet was completed correctly, and Technical Specification 3.1.1.C(2) would only be applicable if Technical Specification 3.1.1C(1) was not satisfied. Following review of deficiencies, the Reactor Analysis staff was reminded that procedures should be reviewed prior to completing the data sheet sections of procedures.

A closer supervisory review will eliminate this type of deficiency discovered during this inspection.

Full compliance with Section 6.8.1 of the Technical Specifications has, therefore, been achieved.

Very truly yours,



R.R. Schneider
Vice President -
Electric Production

WCD/mtm

