

March 19, 1980

Office of Inspection and Enforcement
Region I
Attention Mr. R. T. Carlson, Chief
Reactor Construction and Engineering
Support Branch
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia PA 19406

Dear Mr. Carlson:

Re: Nine Mile Point Unit 2
Docket No. 50-410

Your Inspection Report Number 50-410/80-01 dated February 14, 1980 identified an apparent item of noncompliance resulting from an inspection conducted on January 8-11, 1980. This item includes the failure to perform required equipment maintenance, to furnish recorded evidence of maintenance activities and to control equipment storage in accordance with work and inspection instructions.

Specifically, as of January 11, 1980, certain required lubrication and maintenance had not been performed within the last year on Recirculation Pump Motor 2RCS-M1B. Quality records were not available to furnish evidence, in all cases, that the quarterly tests and inspections for various electrical and lubrication requirements had been performed for Recirculation Pump Motor 2RCS-M1B and Residual Heat Removal Pump Motor 2RHS-P1B. Records indicated completion of test and inspection requirements for Recirculation Pump Motor 2RCS-M1A subsequent to May 2, 1979, after the motor had been removed from the site.

Investigation of the performance of preventive maintenance at Nine Mile Point Unit 2 is still in progress as of this date.

Recirculation Pump 2RCS-M1B (Serial No. 8404186) was examined on January 29, 1980. All annual maintenance was performed in accordance with applicable requirements and procedures. The inspection and maintenance was appropriately documented, the motor was tagged, and the equipment re-entered into long-term storage. No adverse conditions were noted.

Residual Heat Removal Pump 2RHS-P1B (Serial No. CNJ 39028) was inspected and maintenance was performed and documented on March 5, 1980. No adverse conditions were noted.

11/23/55



A complete program review and a comprehensive visual inspection of equipment in storage requiring preventive maintenance and documentation was initiated on January 10, 1980. These inspections are being conducted by experienced personnel not formerly associated with this portion of the work at Nine Mile Point Unit 2. The inspections indicate that the equipment inspected is in an acceptable condition.

An audit of the Visi Card Preventive Maintenance files and back-up documentation files has revealed program discrepancies which have been documented in deviation reports. The inspection and recording discrepancies of the visual inspections are limited to the involvement of one employee only. Disciplinary action has been taken with that employee (discharged).

A comparison of preventive maintenance cards currently in use versus equipment onsite indicates there are 80 items for which preventative maintenance cards have not been prepared or converted over from the old document form. Items which have exceeded the 30-day requirement for the initiation of the preventive maintenance card will be appropriately evaluated and dispositioned in accordance with the Quality Assurance Program. This action will ascertain and correct any possible degradation of equipment in storage. Where required, preventive maintenance cards will be initiated in accordance with the requirements of Specification No. NMP2-SM01.

The following corrective action will be taken:

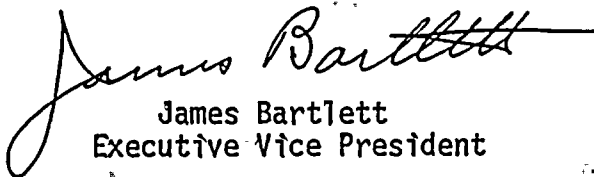
- 1) Increased training of Preventive Maintenance Personnel using formal and on-the-job training sessions will be conducted and documented. Periodic refresher courses will be conducted to maintain program awareness.
- 2) A reassignment of experienced personnel has been made to strengthen the preventive maintenance program. A new Preventive Maintenance Inspection Coordinator and a new Preventive Maintenance Records Coordinator have been appointed.
- 3) Inspection Tags will be attached to each piece of equipment and the Inspector/Craft Foreman will date and initial the inspection of each Preventive Maintenance Operation performed. This will serve as backup documentation and confirmation of the Visi Card Record entries.
- 4) Replacement and future Preventive Maintenance Cards will be reviewed for compliance with specifications and approved by the Field Project Engineer.
- 5) A Field Quality Control Procedure entitled "Internal Audit Procedure - Mechanical Equipment Maintenance Program" will be initiated.
- 6) The Field Quality Control Group will provide surveillance inspection to assure compliance with specification and quality assurance requirements for the storage maintenance program. Field Quality Control surveillance will be increased from the present random selection of records to a planned surveillance of 20 percent of all field activities and records. This increased effort will be continued until documented evidence reflects adequate levels of acceptability.



All corrective action will be completed by April 30, 1980.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION


James Bartlett
Executive Vice President

PEP/JR

