

January 30, 1981

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 50-410/80-11 dated December 17, 1980 identified an item of noncompliance resulting from an inspection conducted October 21-23 and November 4-6, 1980 at the Nine Mile Point Unit 2 site. This item of noncompliance was identified as follows:

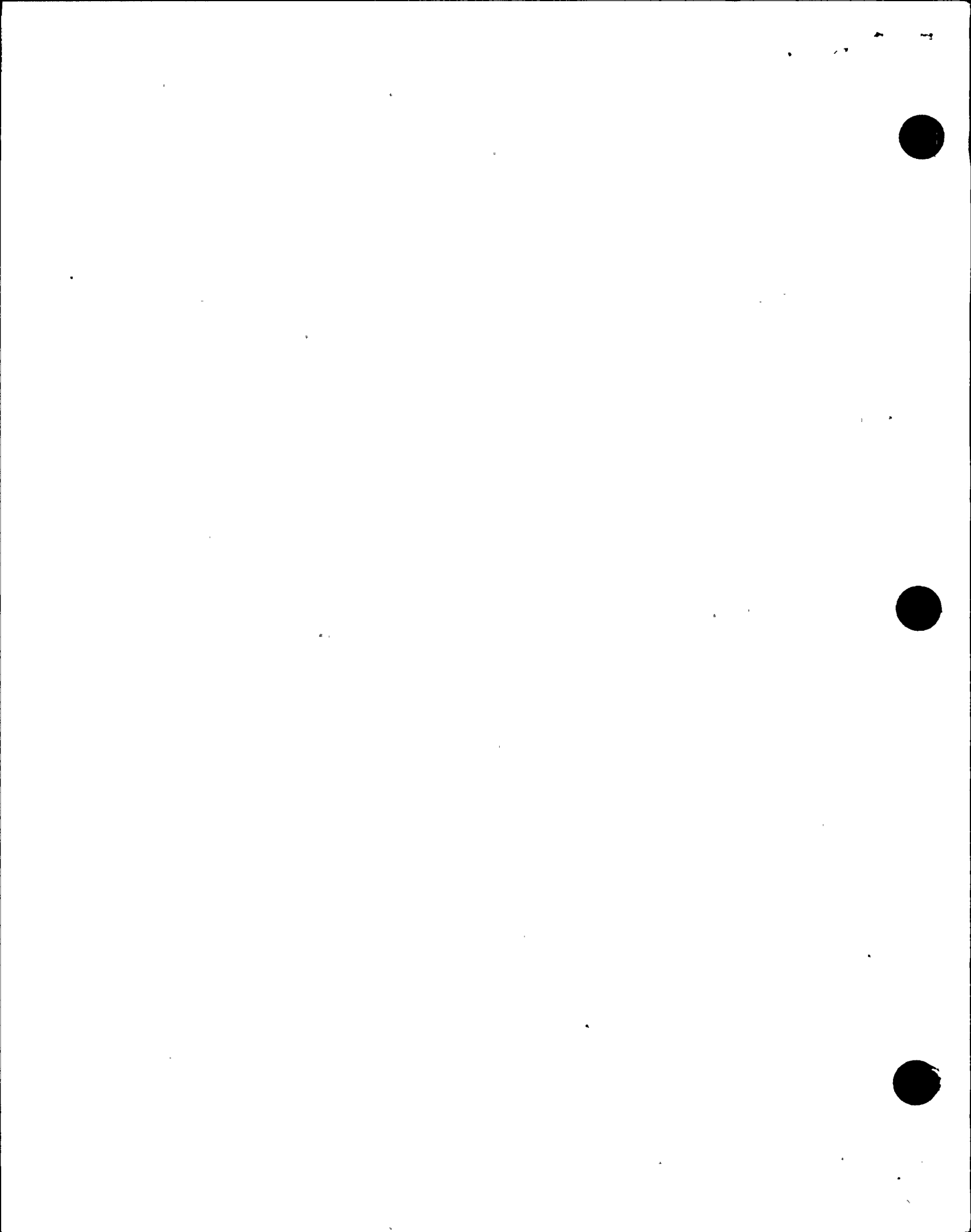
10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be accomplished in accordance with instructions (and) procedures".

The Nine Mile Point Nuclear Station, Unit 2 FSAR, Appendix D, Quality Assurance Program, Paragraph D.2.2, states in part, "NMPC will require Stone and Webster Engineering Corporation to maintain and implement separate but subsidiary Quality Assurance Programs responsive to and designed to satisfy the intent of the Quality Assurance Criteria of Appendix B".

Project Procedure 16, Revision 8, dated July 10, 1980 states in part, "After five E&DCRs and/or N&Ds have been written against a document, the following will apply: Design drawings will be revised (addended) and reissued within 2 months of E&DCR and/or N&D Change No. 5." and "Whenever a drawing is being revised (addended), all E&DCRs written against the document that are outstanding up to the time the document revision enters final review shall be incorporated," "All E&DCRs and addenda will be incorporated to reflect the final as-built conditions".

Quality Control Instruction 6.1 dated January 23, 1980 states in part, "FQC is responsible for closing and maintaining the status of E&DCRs that require inspection by FQC".

Contrary to the above, as of November 6, 1980 the following discrepancies and/or deficiencies in records and drawings existed.



1. Five (5) E&DCRs with closing dates in excess of the maximum time authorized by procedure had not been incorporated into Drawing Numbers 12177-EC-38A-6 and 12177-EC-38C-7.
2. Drawing Number 12177-EC-38A-4 does not reflect the as-built condition of the facility because E&DCR C10,199 was incorrectly incorporated into the drawing.
3. E&DCR C10,379 was still open even though all work affected by the E&DCR had been completed on May 30, 1978.

This item is an infraction.

The following is the corrective action being taken for each of the 3 items including action to prevent further items of noncompliance.

1. The drawings identified (EC-38A-Revision 6 and 38C-Revision 7) were in the process of being revised when the inspection took place. Drawing EC-38A-Revision 7 was issued on December 3, 1980 and drawing EC-38C-Revision 8 was issued on November 18, 1980. The drawings are now in compliance with the requirement contained in Project Procedures 16 and 24 for revising drawings within two months of the date of the fifth E&DCR/N&D.

A survey has been completed and all drawings requiring revision, as required by Project Procedure 16 and 24 have been identified. The necessary revisions will be made by May 1, 1981.

In addition to prevent recurrence Stone and Webster has initiated a monthly review of drawings at the project headquarters to ensure that those drawings requiring revision are updated in accordance with Project Procedures 16 and 24.

2. The work was performed in the field per E&DCR C10,199. However, as stated in the "Notice of Violation" the information was incorrectly incorporated onto the drawing. E&DCR F10,290 was issued during the inspection to correct the drawing. EC-38A - Revision 8 will be revised by February 13, 1981 to incorporate this information.

As a result of NRC Inspection 80-11, the Niagara Mohawk Quality Assurance Department has reviewed a limited sample of E&DCR's/N&D's for proper incorporation into the applicable drawings and have identified some deficiencies which indicated the need to evaluate this area further. Therefore, Stone and Webster will perform a review of a much larger sample of E&DCR's/N&D's for proper incorporation to determine the nature and extent of problem areas. This review will be completed by March 31, 1981 with a preliminary assessment to be provided to Niagara Mohawk by February 6, 1981.



Within 30 days following the completion of Stone and Webster's indepth review, the Nuclear Regulatory Commission will be notified of the results and the corrective action to be taken. Changes being considered include additional audit/surveillance by Stone & Webster and Niagara Mohawk Quality Assurance as well as procedural changes within Stone and Webster's Standard Quality Assurance Program to assure control of E&DCR incorporation.

At least until the preliminary assessment is provided on February 6, 1981 to ensure no irreversible work is performed, Stone and Webster's site extension office has been directed to verify before an actual concrete placement is made that no E&DCR/N&D incorporation errors exist in the drawings which are applicable to the placement.

3. The Notice of Violation states that E&DCR, C10,379 was still open even though all work affected by the E&DCR had been completed on May 30, 1978. In the performance of their inspections, the FQC inspectors utilize all applicable drawings, specifications and E&DCR's in effect at the time of inspections. It is intended that a satisfactory Inspection Report covering the subject work is sufficient proof that the work was satisfactorily completed. However, to avoid future problems in determining the status of E&DCR's, procedural changes to Stone and Webster's Standard Quality Assurance Program are presently in development and details will be available by March 31, 1981.

QCI FN2-S6.1-02A details the procedure utilized by FQC for maintaining the status of E&DCR's requiring inspection by FQC. FQC has reviewed all N/A type E&DCR's that were shown as open on the FQC E&DCR Status Log. There were 1419 E&DCR's entered in the log with a total of 479 shown as open. Of the 479 open E&DCR's, 244 are in a current status (generic, work in progress, etc.), 1 has an N&D open to be resolved by engineering, and 234 were closed (one of which is E&DCR 10,379) either by field verification of the completed work or by the verification of an existing satisfactory inspection report covering the work for which the E&DCR was applicable. Increased emphasis will be placed by FQC in keeping the log up to date in the future. Additionally, Niagara Mohawk Quality Assurance will include review of the status log in their surveillance program.

Your inspection report also indicates concern with the interface between Niagara Mohawk's organization and our contractor. In the past the Niagara Mohawk Quality Assurance Department has emphasized providing assurance that proper and correct information is available in the field and relied more heavily on Stone and Webster's Quality Assurance Program to ensure the correct incorporation and timely closing of E&DCR's/N&D's. However, the area of drawing change control and E&DCR handling was part of Niagara Mohawk's Quality Assurance Department Audit Nos. 27 and 28 which were conducted in September 1978 and January 1979. Although the area of timely incorporation of E&DCR's/N&D's was investigated in Audit Nos. 27 and 28,



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for the documentation checked during these audits, no items of noncompliance were found in the areas in question. It should be noted that in the review recently completed by Stone & Webster less than one percent of the drawings reviewed were not revised within two months of the posting of a fifth E&DCR/N&D. A frequency of less than one percent is not likely to be picked up in a normal random surveillance and audit program. However, the areas of drawing control and E&DCR's/N&D's posting and incorporation are being added to the Niagara Mohawk Quality Assurance Department site surveillance program.

Subsequent to NRC Inspection 80-11, Niagara Mohawk Quality Assurance conducted two audits at the jobsite and at Stone and Webster's project headquarters. These audits investigated the areas of NRC concern, and related areas pertaining to control of drawings, specifications, and changes. One of these audits resulted in the findings discussed in response to Item 2 of the NRC's finding concerning proper incorporation of E&DCR's/N&D's. The results of the audits are presently being pursued and reviewed with Stone and Webster. Copies of the audit reports are available on site for review by the NRC, as will be Stone and Webster's responses when they are received.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

*Donald P. Dise*

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Vice President Engineering

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