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YOUNGBLOOD,B.J. Licensing Branch 1

SUBJECT: Discusses 810126 meeting w/util re reorganization of facility project to enhance effectiveness.Project quality organization description encl.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

March 25, 1981

Mr. B.J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Youngblood:

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

At a meeting on January 26, 1981 with members of your staff, Niagara Mohawk presented a plan for reorganization of the Nine Mile Point Unit 2 Project to enhance its effectiveness.

As a follow up to this meeting, attached is a description of the Project Quality Organization. The new Project Quality Organization, reporting to the Project Manager, will perform the day to day quality functions of the project. The Corporate Quality Assurance Department which is completely independent of the project, will continue to perform the required audits and advise Corporate senior management whether the project is in compliance with the Quality Assurance Program for Nine Mile Point Unit 2.

The Project Quality Organization, when implemented, will comply with the established Quality Assurance Program as described in the Niagara Mohawk Quality Assurance Manual for Nuclear Reactors - Design and Construction Phase. It will also comply with Appendix D of the Preliminary Safety Analysis Report except for the organizational changes described in the attached. The Project Quality Organization will work to the Corporate Quality Assurance procedures until such time as its own procedures are finalized.

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Although staffing and other steps preliminary to the full implementation of the Project Quality Organization will soon be initiated, actual transfer of responsibility for project quality matters from the Corporate Quality Assurance Department to the Project Manager may be deferred until approximately July 1, 1981, or even later. In any event, you will be formally advised of the date when this transition actually occurs.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

Gerald K. Rhode
Vice President
System Project Management

PEF:bd
cc: Robert T. Carlson, Chief
Reactor Construction and Engineering Support Branch

ATTACHMENT

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 2

DOCKET NO. 50-410

Project Quality Organization Description

1. Introduction

The project organization for Nine Mile Point Unit 2 is being revised. The reasons for the reorganization are, in part, that the revised structure:

a. Provides more effective span of management control.
b. Has personnel assigned full time with a singular sense of commitment.
c. Provides an enhanced organizational interface with the Architect/Engineer - Constructor project structure.
d. Provides an enhanced interface between various project disciplines.
e. Provides clearer focal point for upper management attention and problem resolution.
f. Provides improved lines of communications.

Figure 1 presents the quality assurance organization that is to be implemented. The functions within the Project Quality Assurance Program are divided between two groups. Their respective functions are described below.

2. Project Quality Organization

This group reports to the Project Manager as shown on Figure 1. This group will perform the following functions:

a. Maintenance of a proper Quality Assurance Program.
b. Review of procurement documents for adequacy of quality content.
c. Monitoring the vendor qualification program.
d. Monitoring the performance of all project participants in the performance and effectiveness of their quality programs.
e. Managing the project quality budget.
f. Performing the quality control functions required during start-up and testing.
g. Reporting to project management on the progress and status of quality on the project.
h. Initiating quality related corrective actions as necessary.

The qualifications for personnel in the Project Quality Organization are listed in Table 1. Staff members are being selected for unique backgrounds which do not necessarily appear on the organization chart or in the personnel qualification descriptions. The backgrounds include ASME Code knowledge, non destructive examination, records management, materials storage and warehousing and engineering design experience.

Figure 2 presents the Project Quality Organization and staffing levels.

There are two factors which govern the staffing level. These are:

a. The amount of work left to be done in a specific area, and
b. The required level of coverage.

The Project Quality Organization will perform audits with teams of at least two people. One of these will be a qualified lead auditor who will actually lead the audit or will participate in the audit and sign the report. Where only one person is assigned to a specific area, other Project Quality personnel will be used as part of the audit team. Quality Assurance Department personnel may also participate.

3. Corporate Quality Assurance Department

As shown on Figure 1, this department reports separately up the corporate organization to the President of Niagara Mohawk. This group will perform the following functions:

a. Reviewing and approving the Project Quality Assurance Program.
b. Auditing the project on its implementation of the Project Quality Assurance Program.
c. Assuring corporate senior management that the project complies with the Project Quality Assurance Program.

4. Independence

The Project Quality Organization is to have unlimited access to the project, its participants and records for the purpose of verifying quality plans and performance. Any member of the group has the right and responsibility to recommend a Stop Work action to the Project Manager when conditions are observed which constitute a failure to meet quality objectives and is either severe or is not being corrected through regular channels.

Independence will be further ensured by overview of the Project Quality Organization by the Corporate Quality Assurance Department. This group is completely independent of the project and will perform audits on the project. The Corporate Quality Assurance Department's staffing and coverage will be sufficient to fulfill their responsibilities in the Nine Mile Point Unit 2 Quality Assurance Program at each stage of the project.

5. Procedures

The Project Quality Organization, when fully implemented, will comply with the Quality Assurance Policies of the Company as described in the Niagara Mohawk Quality Assurance Manual for Nuclear Reactors - Design and Construction Phase and Appendix D of the Unit 2 Preliminary Safety Analysis Report. These policies are designed to meet Appendix B to 10CFR50. Additionally, the Project Quality Organization will have its own implementing procedures patterned after the corporate procedures. These procedures will be reviewed by Corporate Quality Assurance and have the concurrence signature of the Manager, Corporate Quality Assurance.

The Project Quality Organization will continue to use the Corporate Quality Assurance Department procedures until such time as its own procedures are finalized.

6. Summary of Overall Project Benefits

The reorganization described above will result in several project benefits and quality program enhancements. These include:

a. Clear accountability centers with improved project control.
b. More effective integration of project disciplines.
c. Improved lines of authority, responsbility, and communication.
d. Enhanced follow-up to project commitments and needs.
e. Providing levels of authority and decision making consistent with the nature and gravity of conditions needing action.
f. Better response time to baseline plan variations and problem solving needs.
g. Enhanced team effort in meeting the needs of the project.

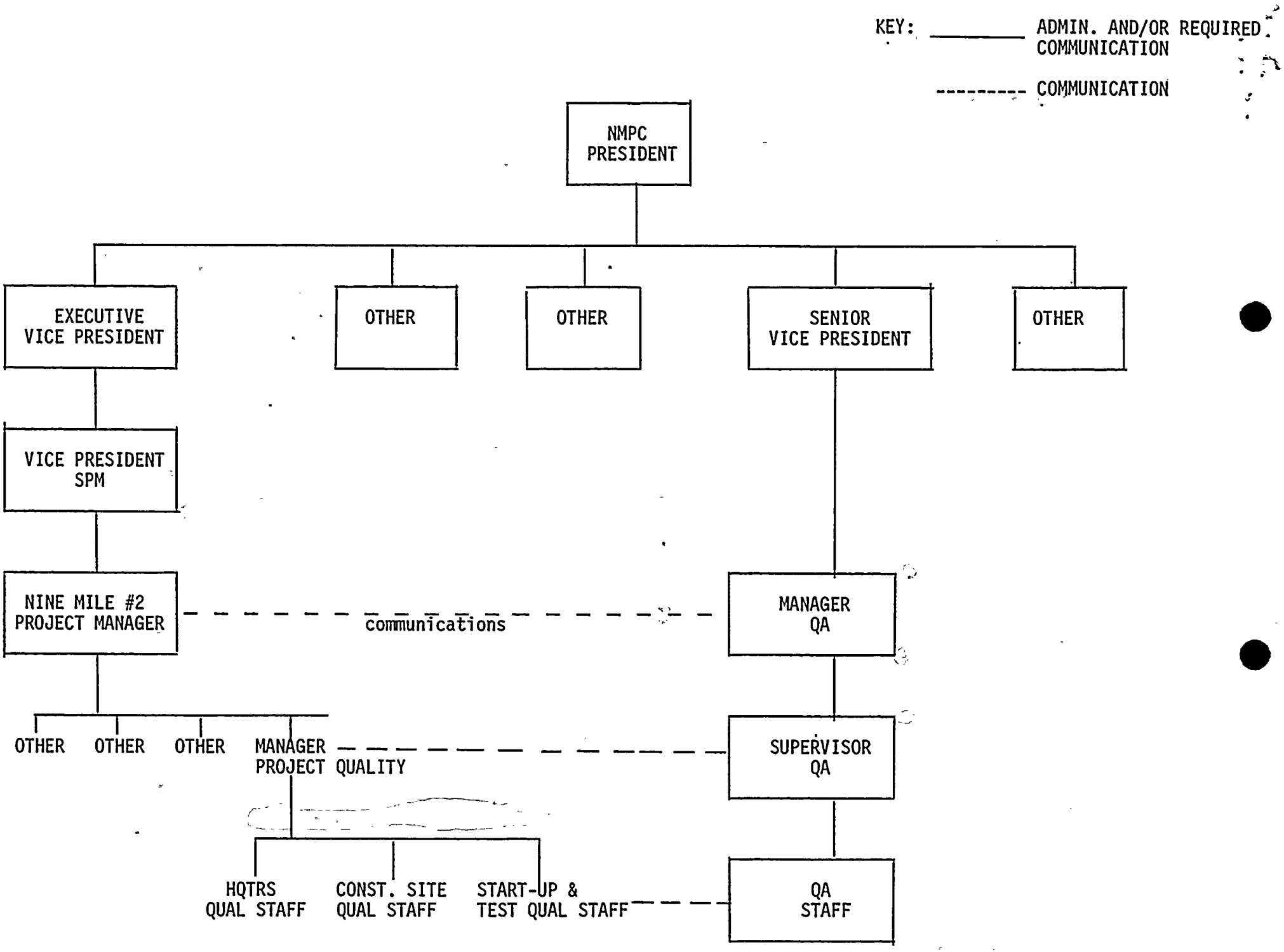

FIGURE 1 Niagara Mohawk Power Organization
Quality Assurance Organization

Table 1
Qualifications Project Quality Organization

Title	*Minimum Required Degree	Minimum Years Experience	Required Background
Manager Project Quality	B.S.	8	Eight years of assignments of increasing responsibility including several functions in the design, construction or operation of nuclear power facilities or equivalent large project and at least three years in quality related work.
Quality Engineer - Lead Construction or Start-up and Test	B.S.	6	Six years of assignments of increasing responsibility including several functions in the design, construction, or operation of a nuclear power plant or equivalent large project and at least two years of quality related work.
Quality Engineer	B.S.	0-20	Background requirements and minimum years of experience vary according to the engineering level (six company engineering levels).

* or equivalent qualification

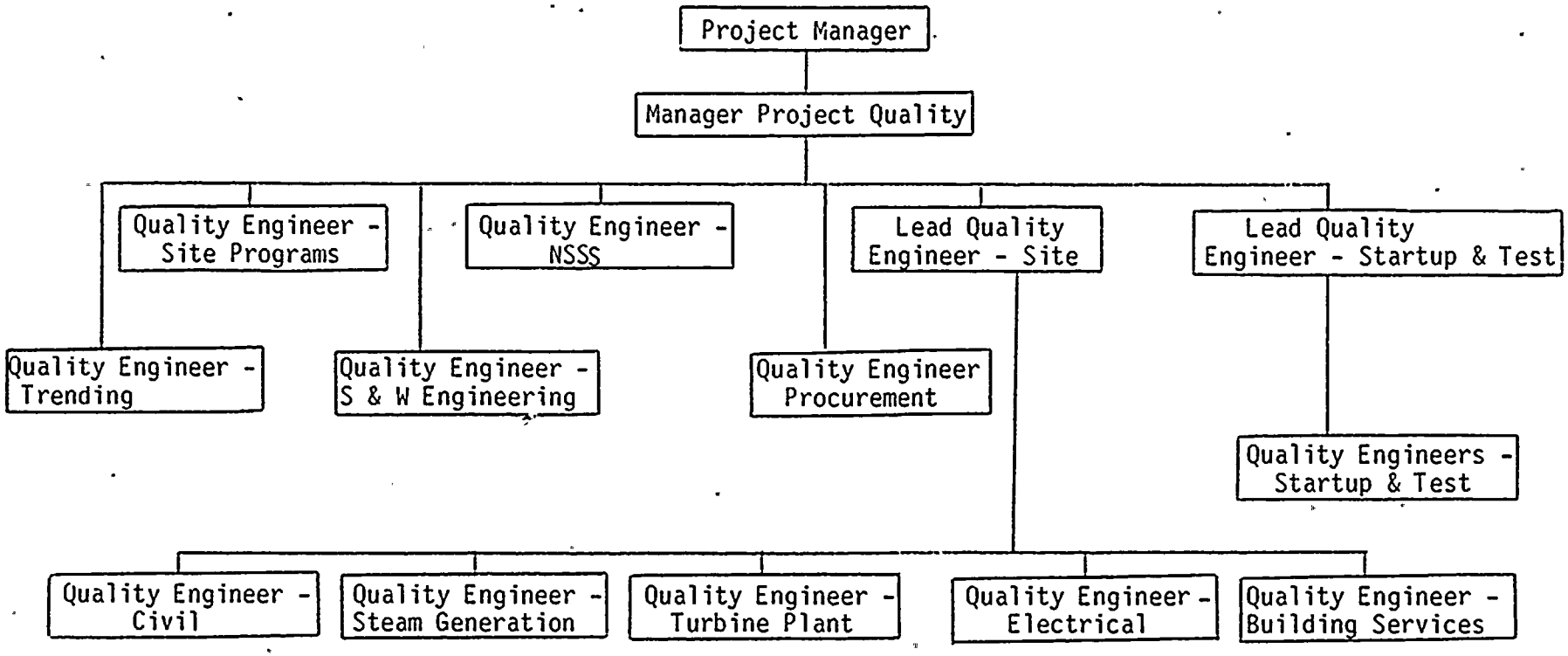

Figure 2. Nine Mile Point Unit 2 Project Quality Organization