

May 29, 1981

Office of Inspection and Enforcement
Region I
Attention: Mr. Eldon J. Brunner, Acting Director
Division of Resident and Project Inspection
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Brunner:

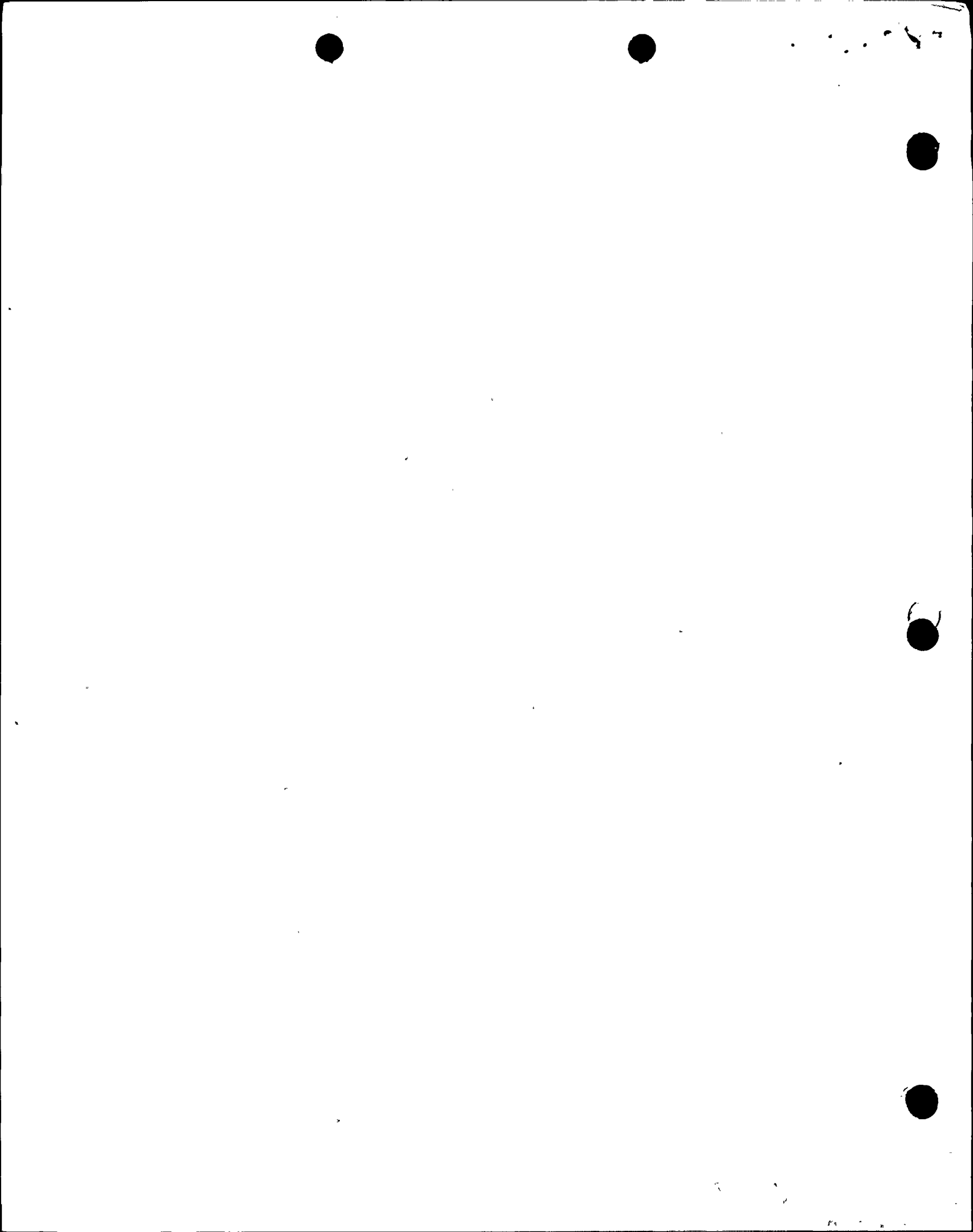
Re: Nine Mile Point Unit 2,
Docket No. 50-410

Niagara Mohawk's letter dated January 30, 1981, provided our response to Inspection Report 50-410/80-11 for Nine Mile Point Unit 2. As part of this response, Niagara Mohawk committed to providing the results of the drawing review for the correct incorporation of E&DCR's/N&D's. Enclosed are the results of the review of Quality Assurance Category I drawings for the correct incorporation of E&DCR's/N&D's and the corrective action to be taken.

To ensure that no irreversible work was performed, structural (EC, ES and EY series) drawings were reviewed to verify that no significant E&DCR/N&D incorporation errors existed prior to a concrete placement. This review continued until March 31, 1981, at which time the evaluation was completed.

In addition, our January 30, 1981 response to Inspection Report 50-410/80-11 committed to revising by May 1, 1981 all drawings identified as requiring revision to incorporate E&DCR's/N&D's posted in excess of the maximum time authorized by procedure. However, a surveillance by the Niagara Mohawk Quality Assurance Department found that not all of the drawings identified were revised by May 1, 1981 (fourteen (14) out of forty-nine (49) were not revised). In addition, a review of approximately 2300 drawings identified forty-one (41) additional drawings which are not in compliance with Project Procedures for timely incorporation of E&DCR's/N&D's. Corrective

8106240 237

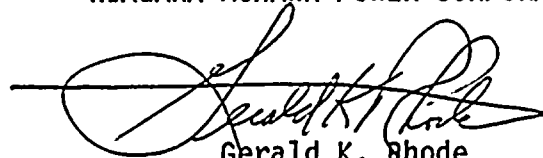


Mr. Eldon J. Brunner
Page 2
May 29, 1981

action has been initiated for these drawings and will be completed by July 15, 1981. The responsible Niagara Mohawk Quality Organization will monitor this area initially on a monthly basis to assure compliance is maintained. The frequency of this surveillance may be increased or decreased in later months as circumstances warrant.

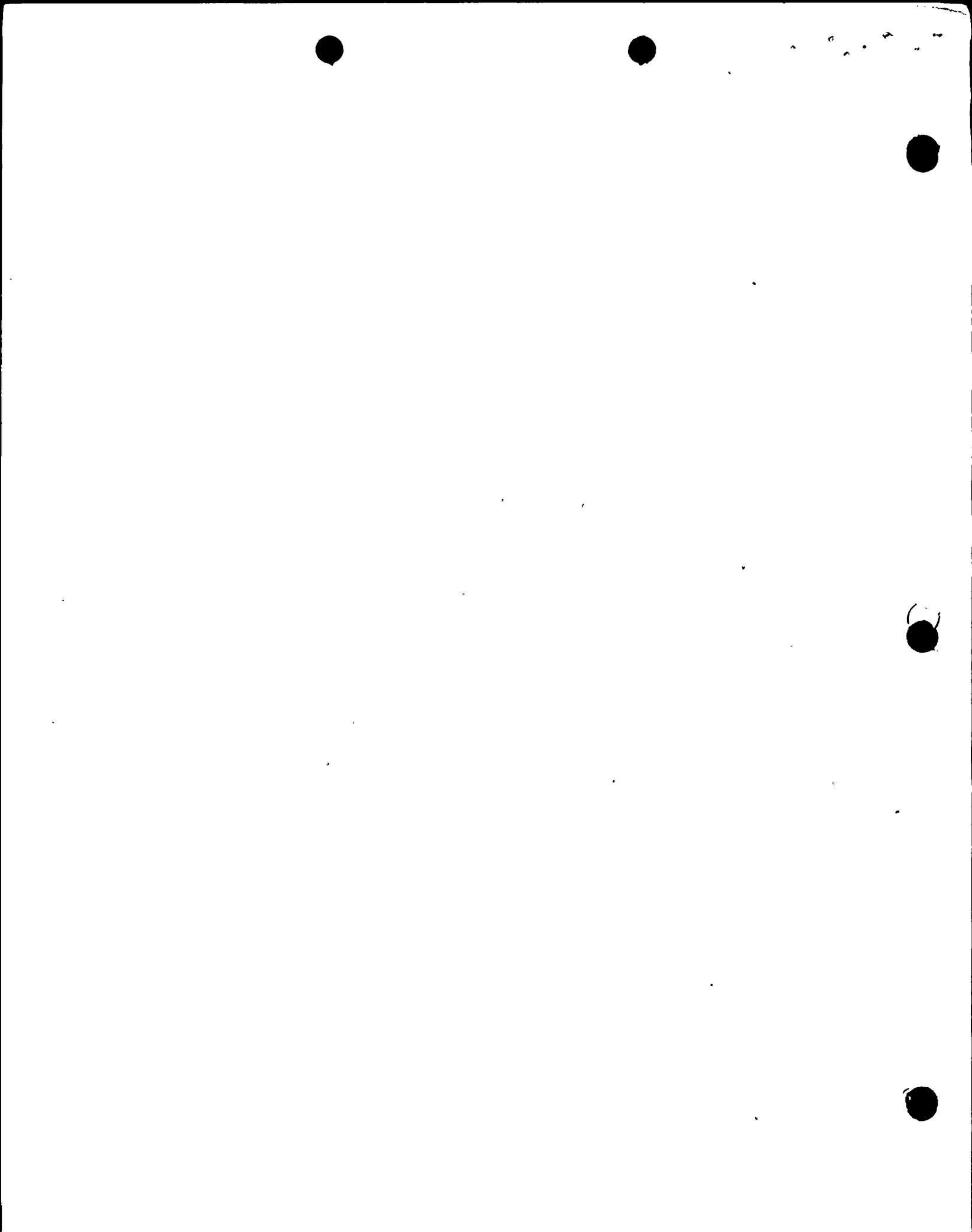
Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

A handwritten signature in black ink, appearing to read "Gerald K. Rhode", is written over a horizontal line.

Gerald K. Rhode
Vice President
System Project Management

PEF/jab
Enclosures



NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 2

DOCKET NO. 50-410

Results of Drawing Review
and Corrective Action
for IR 80-11 Item of
Noncompliance

Results of Drawing Review

1. Concrete (EC), Steel (ES) and Yard (EY) Drawings

The review of 2,064 E&DCR's/N&D's into 259 structural drawings found a total of 276 discrepancies. Of these, 215 E&DCR's/N&D's were properly implemented but were not reflected in the "As Built" drawing. These 215 E&DCR's/N&D's involved drawing details such as cadweld splice relocations, rebar details around penetrations, etc. and as such did not substantially change the drawing. The remaining 61 E&DCR's/N&D's problems involved improper incorporation of work in progress into the applicable drawings. However, the actual changes involved were minor in nature and no significant technical or rework problems would have resulted if the work was performed as indicated in the drawings.

Examples of the types of discrepancies follow:

- a. Not Incorporated - E&DCR was indicated on the drawing change record as being incorporated, however, the document was not completely incorporated in the applicable drawing. In some cases, no change had been made to the drawing that had been revised.
- b. Incorporation Difficulty - Essentially identical to Not Incorporated status, however, based on the Engineers' evaluation, incorporation would have been difficult.
- c. Incorrect information - The incorporation into the drawing was not identical to the E&DCR/N&D creating the change.

2. Piping (EP) Drawings

The review of 341 E&DCR's/N&D's into 55 piping drawings found a total of 9 minor discrepancies. None would cause a significant technical or rework problem.



3. Building Services (EB) Drawings

33 E&DCR's that were incorporated into 31 building service drawings were reviewed. This was all of the Quality Assurance Category I E&DCR's remaining to be reviewed. One discrepancy has been found. E&DCR P20751 revised the size of fire dampers in the Control Building. The issue of drawings EB-39A-4 and EB-39F-4 indicated that E&DCR P20751 was incorporated, but the damper sizes were different on the drawing. Further investigation has shown that the drawing is correct and a revision to the E&DCR is required.

4. Piping Support (BZ) Drawings

The review of 100 E&DCR's into 90 pipe support drawings found no problems. In addition, the review of 80 E&DCR's that have been incorporated into Grinnell pipe support drawings to date showed no problems.

5. Instrument (EK) Drawings

Two E&DCR's have been written against instrument design drawings and have not been incorporated into the drawings at this time.

Corrective Action

1. An initial training program in the implementation of procedures for the incorporation of E&DCR's/N&D's into drawings was conducted for Design Checkers on March 3 and 4, 1981. A training program based on any new procedural changes adopted by the project will be conducted by July 1, 1981.
2. Project Procedures PP16 and PP24 will be revised by June 15, 1981 to assure control of E&DCR/N&D incorporation.
3. Any error found in E&DCR/N&D incorporation will be corrected in the next drawing revision if they do not affect construction activities in the field or corrected via E&DCR/N&D for those activities under construction.
4. An audit will be performed by Stone & Webster by August 28, 1981 to verify project compliance following the issue of the updated Project Procedures.
5. The responsible Niagara Mohawk Quality Organization will perform audit/surveillance quarterly of the area of proper E&DCR/N&D incorporation. The frequency of audit/surveillance may be increased or decreased in later months as circumstances warrant.

