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DISE,D.P. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Responds to Generic Ltr 81-01 re qualification of ins,exam, testing & audit personnel.Util is meeting regulatory positions C.5,6,7,8 & 10 of Reg Guide 1.58,Revision 1 w/two exceptions.

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NIAGARA MOHAWK

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

July 30, 1981

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

This letter is in response to your generic letter 81-01 regarding qualification of inspection, examination and testing and audit personnel. Your letter requested Niagara Mohawk to commit to meet regulatory positions C.5, 6, 7, 8 and 10 of Regulatory Guide 1.58, Revision 1 and Regulatory Guide 1.146 or describe alternative methods of complying.

In response, Niagara Mohawk is currently meeting the regulatory positions C.5, 6, 7, 8 and 10 of Regulatory Guide 1.58, Revision 1 with the following clarifications and exceptions:

1. Personnel who are licensed according to 10 CFR 55 are considered certified for the surveillance tests and inspections assigned to operators without further documentation in accordance with ANSI N45.2.6-1978.

2. Regulatory Position C.6 states that a candidate should be a high school graduate or have earned the General Education Development equivalent of a high school diploma. In lieu of this, Niagara Mohawk will certify personnel in accordance with the recommendations of Section 3.5, "Education and Experience - Recommendations," of ANSI N45.2.6-1978.

Regarding the regulatory position of Regulatory Guide 1.146, Niagara Mohawk's current Quality Assurance Department's procedures and practices are in compliance with these requirements. However, it should be noted that the requirements of Regulatory Guide 1.146 do not apply to Safety Review and Audit Board auditors.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION

Donald P. Dise

Donald P. Dise
Vice President Engineering

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