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 EISENHUT, D. G. Division of Licensing

SUBJECT: Forwards info requested in NRC 810504 Generic Ltr 81-01 re qualification of insp, exam & testing & audit personnel.

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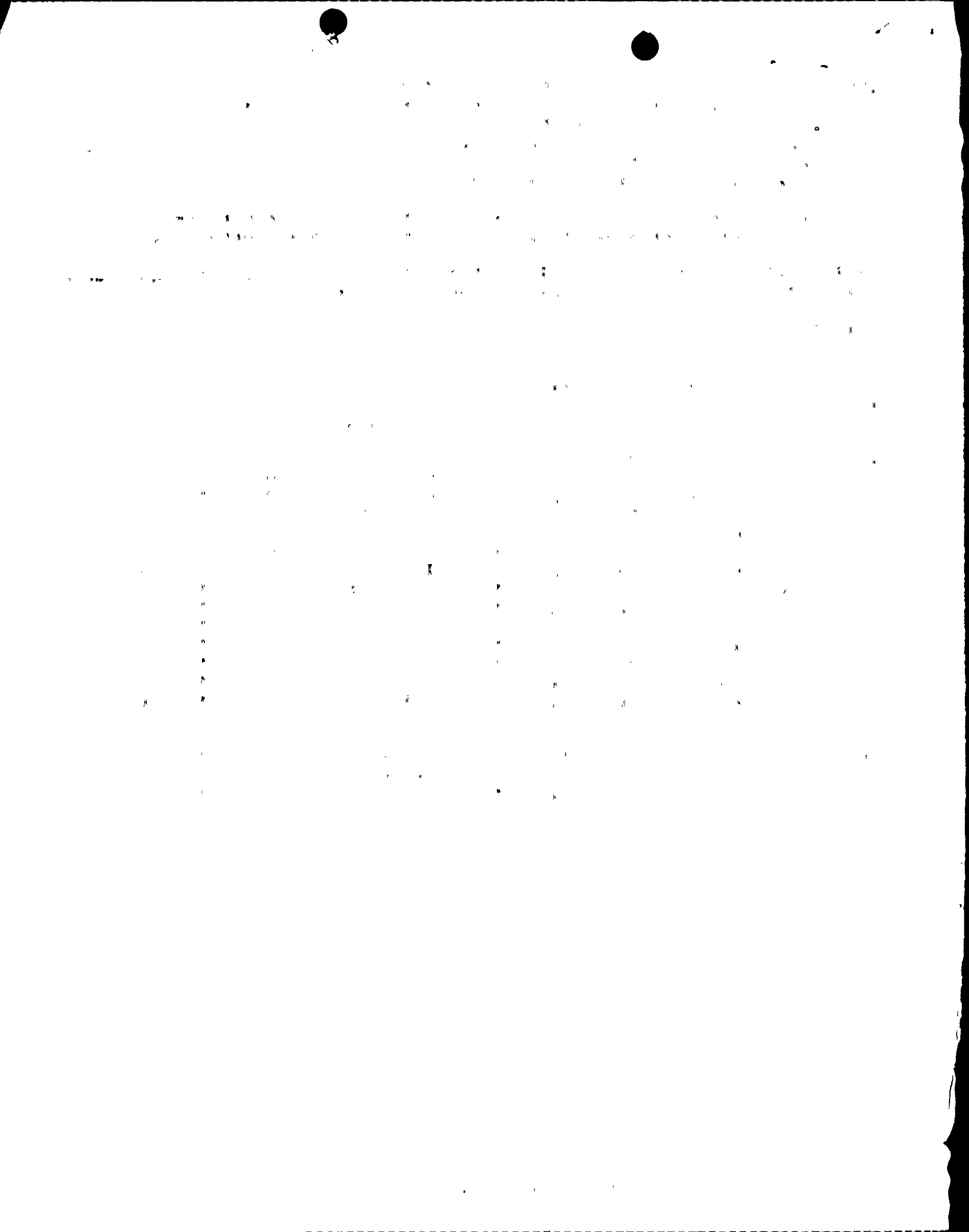
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September 14, 1981

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 2  
Docket No. 50-410

Your generic letter 81-01 dated May 4, 1981 discusses the qualification of inspection, examination and testing and audit personnel. The attached addresses the request contained in your letter.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

A handwritten signature in black ink, appearing to read "Gerald K. Rhode".

Gerald K. Rhode  
Vice President  
System Project Management

PEF:ja  
Attachment

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PDR ADCK 05000410  
A PDR

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NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 2

DOCKET NO. 50-410

Niagara Mohawk and its principal agents, the Stone & Webster Engineering Corporation and the General Electric Company, will comply with regulatory positions C.5, 6, 7, 8 and 10 of Regulatory Guide 1.58, Revision 1 and Regulatory Guide 1.146 for the design, construction and pre-operational testing activities of Nine Mile Point Unit 2 as follows:

A. Niagara Mohawk

The Niagara Mohawk Quality Assurance Program for Nine Mile Point Unit 2 is currently in compliance with regulatory positions C.5, 6, 7, 8 and 10 of Regulatory Guide 1.58, Revision 1 and Regulatory Guide 1.146.

B. Stone & Webster Engineering Corporation

Stone & Webster's Quality Assurance Program for Nine Mile Point Unit 2 is currently in compliance with regulatory positions C.5, 7, 8 and 10 of Regulatory Guide 1.58, Revision 1 and Regulatory Guide 1.146. Regarding regulatory position C.6 of Regulatory Guide 1.58, Revision 1 and Section 3.5, "Education and Experience - Recommendations," of ANSI N45.2.6-1978, the following alternatives are proposed for personnel education and experience for each level:

3.5.1 Level I

(1) Two years of related experience in equivalent inspection, examination, or testing activities, or

(2) High school graduation/General Education Development equivalent and six months of related experience in equivalent inspection, examination, or testing activities, or

(3) Completion of college level work leading to an Associate Degree in a related discipline plus three months of related experience in equivalent inspection, examination, or testing activities.

(4) Four year college graduation plus one month of related experience or equivalent inspection, examination or testing activities.

3.5.2 Level II

(1) One year of satisfactory performance as Level I or five years related experience in the corresponding inspection, examination or test category or class, or

(2) High school graduation/General Education Development equivalent plus three years of related experience in equivalent inspection, examination, or testing activities, or

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(3) Completion of college level work leading to an Associate Degree in a related discipline plus one year related experience in equivalent inspection, examination, or testing activities, or

(4) Four year college graduation plus six months of related experience in equivalent inspection, examination, or testing activities.

### 3.5.3 Level III

(1) Six years of satisfactory performance as a Level II or 15 years of related experience in the corresponding inspection, examination or test category or class, or

(2) High school graduation/General Education Development equivalent plus ten years of related experience in equivalent inspection, examination, or testing activities; or high school graduation plus eight years experience in equivalent inspection, examination, or testing activities, with at least two years as Level II, and with at least two years associated with nuclear facilities-or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility, or

(3) Completion of college level work leading to an Associate Degree and seven years of related experience in equivalent inspection, examination, or testing activities, with at least two years of this experience associated with nuclear facilities-or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility, or

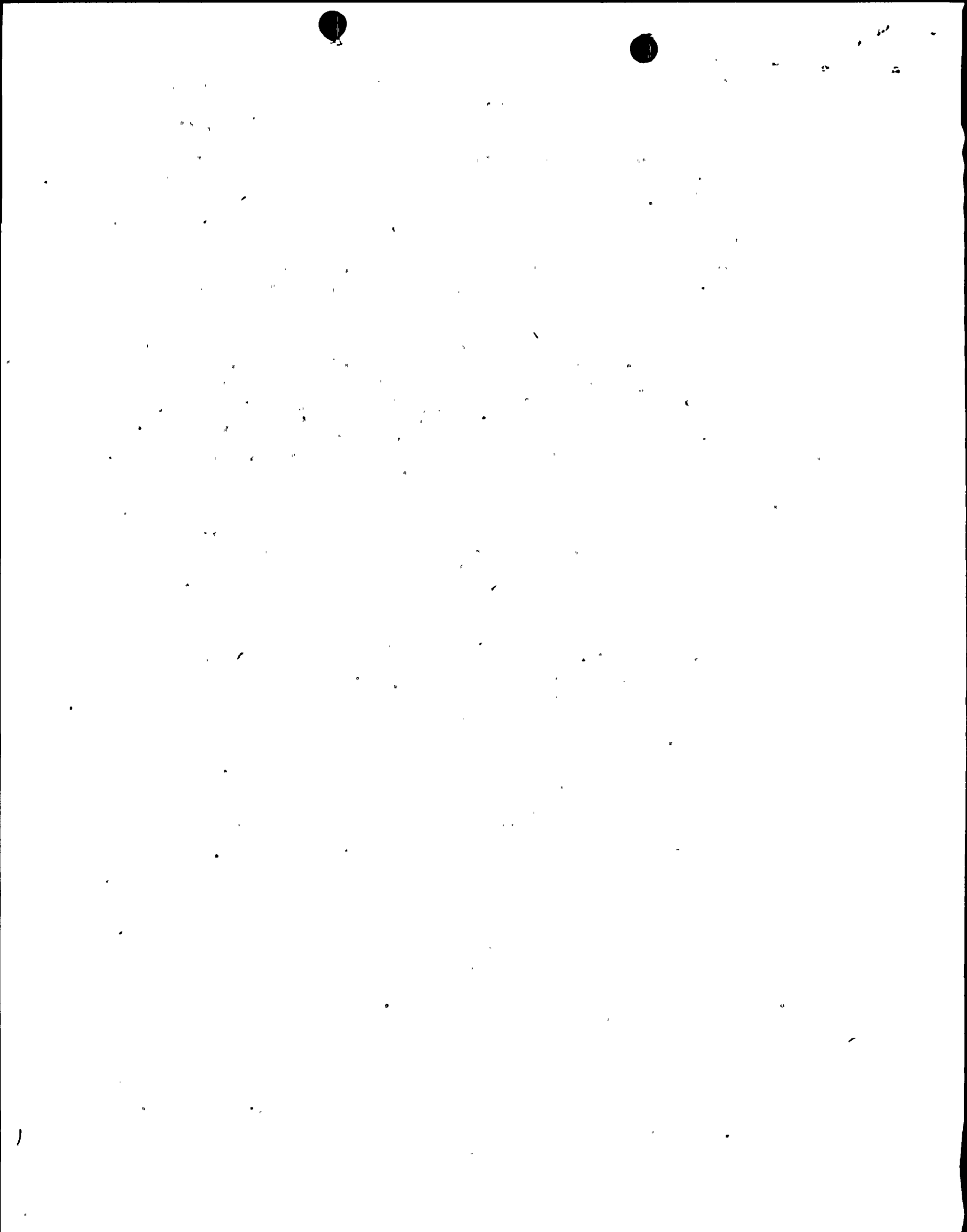
(4) Four-year college graduation plus five years of related experience in equivalent inspection, examination, or testing activities, with at least two years of this experience associated with nuclear facilities-or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility.

(5) Graduate degree plus three years of related experience in equivalent inspection, examination, or testing activities, with at least two years of this experience associated with nuclear facilities or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility.

### C. General Electric Company

The General Electric Quality Assurance is in compliance with the provisions of Regulatory Guide 1.58, Revision 1, including the regulatory position relative to ANSI/ASME N45.2.6-1978, except as follows:

1. In lieu of Paragraph 2.4 of ANSI N45.2.6, NEBG personnel who are responsible for reviewing and approving inspection and test procedures or performing inspection and test activities are considered certified by the fact that they have been evaluated on the basis of training, past experience and performance on related jobs, and found fully competent and qualified in the documented functions of their assignment. Non-destructive examination procedures will be prepared or reviewed and approved, and performed by personnel who have been qualified to SNT-TC-1A.





2. In lieu of the formal educational documentation outlined in Paragraph C.6 of Regulatory Guide 1.58, Revision 1, inspectors and testers who do not hold a high school diploma or the General Education Developed (GED) equivalent of a high school diploma are evaluated on the basis of past experience and performance on similar jobs to assure that they are fully qualified to perform their assigned duties.

The GE Quality Assurance Program complies with the provisions of Regulatory Guide 1.146, including the regulatory position relative to ANSI/ASME N45.2.23-1978 except as follows:

1. In lieu of the system to qualify lead auditors as covered in Paragraphs 2.3 and 4.2, General Electric management will evaluate each candidate for lead auditor on an individual case basis. Certification of qualification will be documented showing, 1) Education, 2) Major Training Programs, 3) Professional Licenses/ Certificates held, 4) General Experience, and 5) Auditing Experience of the Candidate leading to certification as a lead auditor. The Quality Assurance manager of the applicable component reviews and determines whether the candidate is or is not qualified to be a lead auditor.
2. For any new lead auditors initially certified after August 1981, a record will be made of the evaluation of the candidate. Such records will be classified non-permanent and maintained with certification of qualification.

