

September 28, 1981

Office of Inspection and Enforcement
Region I
Attention: Mr. Eldon J. Brunner, Chief
Projects Branch #1
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

Your Inspection Report No. 50-410/81-07 dated September 1, 1981, identified an apparent item of noncompliance resulting from an inspection conducted July 27 through 31, 1981, at the Nine Mile Point Unit 2 site. This apparent item of noncompliance was identified as follows:

10 CFR 50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions...and shall be accomplished in accordance with these instructions...."

Section D.3.6 of PSAR, Appendix D, states, in part, that: "Written procedures are promulgated by QA Department...for assuring that the quality of material and equipment is maintained from receipt, through installation...so that there will be no degradation or deterioration of material or equipment."

Section 5.1.4 of Specification E-061A states, in part, that: "All motors shall have motor windings...resistance megger tested as specified in Section 7.6.3. All test reports shall be submitted to the engineers for evaluation."

Contrary to the above, on July 30, 1981, pump motor electrical test data obtained by one contractor and stored by another had not been submitted to the Engineers for evaluation.

This is a Severity Level V Violation. (Supplement II)

The following information is provided in response to this Notice of Violation:

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The intent of Specification No. NMP2-E061A Section 5.1.4 is that only the 10-minute motor winding insulation resistance test (megger test) is to be submitted to the Engineers for evaluation. The specification further indicates that a 10-minute megger test is required only if the resistance value for the 1-minute megger test is found to be unacceptable.

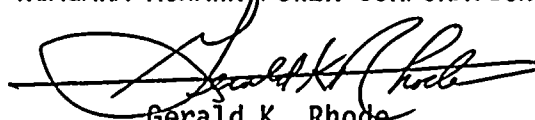
Therefore, in response to the particular instance referred to in your Inspection Report, there was no violation of the intent of the specification requirements. The test results from the 1-minute winding insulation test were acceptable, and no further action was required. Had the data been unacceptable, then the contractor would have had to perform the additional 10-minute megger test and submit the report on this test to the Engineers for evaluation.

However, to prevent future misinterpretation of the specification requirements, the following steps have been taken:

1. On August 5, 1981, a clarification of the intent of Specification No. NMP2-E061A, Section 5.1.4, was provided to the contractor responsible for the preventive maintenance storage program. This clarification indicated that lines 2.18 through 2.49 of the referenced specification section provided details and acceptance criteria for performing a 1-minute motor winding insulation resistance test (megger test). If the resistance value obtained is found to be acceptable, then the test is completed, and no further action is required. If the resistance value is found to be unacceptable, then lines 2.52 through 2.56 require that an additional 10-minute megger test be performed and the report on this test is to be submitted to the Engineers for evaluation of acceptability and/or further action.
2. In addition, clarification of specification and contract responsibilities has been provided to the contractor.
3. On August 7, 1981 Stone & Webster conducted training on electrical meggering to contractor and Stone & Webster Quality Assurance personnel.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



Gerald K. Rhode
Vice President
System Project Management

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