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AUTH.NAME AUTHOR AFFILIATION
RHODE,G.K. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Forwards mod to 811124 ltr re tentative plans for new project quality organization.Implementation of modified project commencing immediately,since unit functions separate from corporate assurance program.

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NIAGARA MOHAWK

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

January 22, 1982

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Dear Mr. Schwencer:

Our November 24, 1981 letter described tentative plans for a new Project Quality Organization for the Nine Mile Point Unit 2 project. In the interim, and after further discussions with Nuclear Regulatory Commission personnel, we have modified this as outlined in the attachment.

Also, as recently discussed with and countenanced by members of your staff, implementation of this modified project organization is commencing immediately since this unit will function separate from and not alter in any way, the Corporate Assurance Program already established for this project.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

Gerald K. Rhode
Vice President
System Project Management

PEF:bd

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Attachment
cc: Mr. Eldon J. Brunner
Chief, Projects Branch No. 1
Division of Resident and Project Inspection
Office of Inspection and Enforcement, Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 2

DOCKET NO. 50-410

COMPLIANCE AND VERIFICATION UNIT

Niagara Mohawk proposes to establish a new unit within the Project Organization to assist the Project Manager in determining on a day-to-day basis that all design, fabrication, erection and testing activities are being conducted in compliance with quality and other project requirements. The new unit will also assist in the timely evaluation, reporting and closure of identified deficiencies. This unit will function separate and distinct from, and not alter in any way, the Corporate Quality Assurance Program already established for this project in accordance with Appendix B to 10 CFR 50 and as described in Appendix D to the Nine Mile Point Unit 2 Preliminary Safety Analysis Report (PSAR).

This new unit is designated as the Compliance and Verification Unit and will be headed by a Manager reporting directly to the Unit 2 Project Manager. The Unit's principal duties and functions are outlined below:

PROJECT PROCEDURES

- Assist the project in the completion of Niagara Mohawk Project Organization procedures and functional descriptions.

- Monitor, evaluate and regularly verify to the Project Manager that Niagara Mohawk Project Organization procedures are being properly implemented.

- Monitor, review and regularly report to the Project Manager on the status and proper implementation of Stone & Webster project procedures and functional descriptions.

LICENSING ACTIVITIES

- Verify to the Project Manager and the Vice President-System Project Management that statements proposed for incorporation in reports to the Nuclear Regulatory Commission are accurate. This will be accomplished for the most part by direct inspection of the activities involved.

- Periodically report to the Project Manager and the Vice President-System Project Management on (i) the status of all outstanding commitments contained in previous Nuclear Regulatory Commission correspondence and (ii) pending responses due Nuclear Regulatory Commission.

- Coordinate and/or monitor the preparation of proper and timely responses to Nuclear Regulatory Commission Inspection Reports, including any recommendations for corrective actions which may be appropriate.

- Coordinate and/or monitor the systematic review of non-conformances for potential deficiency reporting to Nuclear Regulatory Commission and regularly verify to the Project Manager that these activities are timely and current.

DESIGN, PROCUREMENT AND CHANGE CONTROLS

- Monitor, evaluate and regularly verify to the Project Manager that all applicable design procedures and guidelines are being properly and timely implemented.

- Review and assist, as necessary, in the development of the quality and compliance requirements to be incorporated in procurement documents and specifications. This effort shall be on a selective basis or as otherwise directed by the Project Manager.

- Monitor, evaluate and regularly verify to the Project Manager that all applicable design and change control procedures and guidelines are being properly and timely implemented.

- Monitor, evaluate and regularly verify to the Project Manager that all applicable procedures and guidelines concerning incorporation of Engineering and Design Coordination Reports/Nonconformance and Disposition Reports into design drawings are being properly and timely implemented.

NONCONFORMANCES AND DEFICIENCIES

- Coordinate and/or monitor the proper and timely investigation and determination of corrective actions in connection with nonconformance reports originated by Stone & Webster, Contractors or Niagara Mohawk. (Particular attention will be focused on basic causes of the problems which may suggest need for generic changes to methods and procedures.)

- Monitor and assist in the timely closure of nonconformances with regular reports to the Project Manager.

- Monitor, evaluate and regularly verify to the Project Manager that applicable procedures and guidelines governing the resolution of unsatisfactory conditions, nonconformances and noncompliances are being properly and timely implemented.

- Inform the Project Manager and Corporate Quality Assurance Department, on a timely basis, in writing of any known or suspected quality-related deficiencies.

- Conduct and/or monitor investigations for the Project Manager (in cooperation with Corporate Quality Assurance) of known or suspected deficiencies previously identified by others, including those in vendors' shops prior to shipment, to (i) ensure continuity of corrective actions and/or other dispositions, (ii) prompt resolution of the problem and (iii) appropriate and timely reporting, as necessary. Coordinate corrective actions to the extent directed on a case-by-case basis by the Project Manager.

TREND ANALYSES

- Perform trend analyses of various activities to identify systematic problems or those symptomatic of exceptional negative experience with a particular vendor, activity or program. These analyses may include but are not necessarily limited to:

  (i) Evaluation of the adequacy of drawings and specifications issued for construction by trend analysis of Engineering and Design Coordination Reports and Nonconformance and Disposition reports.

  (ii) Evaluation of the effectiveness of the Construction Control and Completion Program in identifying quality and compliance problems, the manner in which they are investigated and reviewed, and the taking of appropriate and timely corrective actions. This will be undertaken by analyses of trends of Construction Control and Completion Program findings.

  (iii) Evaluation of the adequacy of Stone & Webster and Contractor Training programs relating to quality and compliance requirements. This will be undertaken by analyses of trends of impact of training on quality and compliance experience.

  (iv) Evaluation of the effectiveness of Contractor quality and compliance programs and the adequacy of Stone & Webster's surveillance and control over these activities.

  (v) Review and evaluation of quality and construction experience at other selected nuclear project sites to the extent these may be related to similar activities or possible generic trends at Unit 2.

STARTUP AND TEST

- Review and assist, as necessary, in the development of quality and compliance requirements to be incorporated in startup and test procedures.

GENERAL

- Monitor and analyze cost-effective utilization and scheduling of quality resources employed on the project and report results on a timely basis to the Project Manager.

The above compliance and verification activities will be conducted under the supervision of the Project Manager. However, the Compliance and Verification Unit will keep Corporate Quality Assurance Department informed of its activities and Corporate Quality Assurance Department will receive copies of all significant findings, reports and recommendations proposed by the Unit. In addition, certain activities, e.g., in-depth investigation of a vendor quality or compliance problem, may be jointly conducted by representatives from both the Corporate Quality Assurance Department and the Compliance and Verification Unit because of parallel interests.