NIAGARA MOHAWK

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

March 3, 1982

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

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

Dear Mr. Starostecki:

Your Inspection Report No. 50-410/81-14 dated February 9, 1982 identified an apparent item of noncompliance resulting from an inspection conducted from December 21, 1981 to January 15, 1982 at the Nine Mile Point Unit 2 construction site. Niagara Mohawk's response to this item is attached.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

Gerald K. Rhode
Vice President
System Project Management

PEF:ja
Attachment
cc: Mr. R. D. Schulz, Resident Inspector

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NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 2

DOCKET NO. 50-410

Response to the Notice of
Violation Enclosed in
NRC Inspection Report No.
50-410/81-14 dated February 9, 1982

Notice of Violation

As a result of the inspection conducted December 21, 1981 to January 15, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

A. 10CFR50, Appendix B, Criterion V states, in part, "Activities affecting quality shall be prescribed by documented instructions, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Nine Mile Point Nuclear Station, Unit 2, PSAR Appendix D adopts the Stone & Webster Nuclear Quality Assurance Program which invokes Construction Methods Procedure Manual, Section No. 6, as a required implemented document for the Nine Mile Point, Unit 2, site, and requires in CMP 6.2-5.78, Structural Welding, paragraph 5, and CMP 6.4-5.78, paragraph 6, that Construction Completion Checklists be prepared and completed in order to provide a documented surveillance of welding and weld material control by construction supervision.

Contrary to the above, Construction Completion Checklists had not been prepared and completed for Cives Steel Corporation and Schneider Power Corporation as required by CMP 6.2-5.78, and none of the contractors had prepared and completed the Construction Completion Checklist as required by CMP 6.4-5.78.

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

Response

The Construction Control and Completion Program (CCCP) which requires the use of Construction Completion Checklists was not intended to be part of the Quality Assurance Program, as defined in the Quality Assurance Program Manual, Nine Mile Point - Unit 2. The CCCP is only a tool used by the Construction Department to control construction activities. Therefore, measures are being taken to delete the CCCP from the Quality Standards (QS) and Construction Method Procedure (CMP) Manuals so that CCCP is not interpreted as being part of the Unit 2 Quality Assurance Program. However, it is Stone and Webster Engineering Corporation's and Niagara Mohawk's intentions to implement the CCCP at the Unit 2 construction site.

As of the week of January 18, 1982, the CCCP checklist for CMP 6.4, Weld Material Control, has been implemented at the site by SWEC personnel.

Preliminary implementation of CMP 6.2, Structural Welding, began on February 1, 1982, for Cives Steel Corporation and Schneider Power Corporation. The necessary checklist preparation and personnel training were performed during the month of February. Training and full implementation of CCCP checklists for CMP 6.2, Structural Welding, has been completed as of March 1, 1982.

STATE OF NEW YORK )
ss:
COUNTY OF ONONDAGA )

GERALD K. RHODE, being duly sworn says:

I am Vice President, System Project Management of Niagara Mohawk Power Corporation. I have read the foregoing letter and attachment, and the information contained in the letter and attachment is true to the best of my knowledge, information and belief.

GERALD K. RHODE

Sworn to before me on this
31st day of March, 1982

Notary Public

HAZEL J. CARRICK
Notary Public in the State of New York
Qualified in Onon. Co. No. 4524460
My Commission Expires March 30, 1982