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AUTH.NAME AUTHOR AFFILIATION
LEMPGES,T.E. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Forwards info responding to questions re QA program & provides program update reflecting QA responsibility for preliminary testing.Info will be incorporated in Nov 1984 FSAR amend.

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NIAGARA MOHAWK

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

October 25, 1984
(NMP2L 0217)

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

Dear Mr. Schwencer:

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

Enclosed for your use is information which responds to Nuclear Regulatory Commission staff questions on the Nine Mile Point Unit 2 Quality Assurance program and provides a program update to reflect Quality Assurance responsibility for preliminary testing. This information will be incorporated in the November 1984 Final Safety Analysis Report Amendment.

Additionally, we will provide an update to Chapter 14 in the November 1984 Final Safety Analysis Report Amendment to reflect the change in performance of preliminary testing, specifically the fact that Niagara Mohawk will be managing this effort.

Very truly yours,

T. E. Lempges
Vice President
Nuclear Generation

TEL/DS:ja
Enclosure
xc: R. Gramm, NRC Resident Inspector
Project File (2)

B001
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Niagara Mohawk Power Corporation	)	Docket No. 50-410
	)	
(Nine Mile Point Unit 2)	)	

AFFIDAVIT

T. E. Lempges, being duly sworn, states that he is Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

Thomas E. Lempges

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 25 day of October, 1984.

Janis M. Macro
Notary Public in and for
Onondaga County, New York

My Commission expires:
JANIS M. MACRO
Notary Public in the State of New York
Qualified in Onondaga County No. 4784555
My Commission Expires March 30, 1985.

5. Implementing all required quality control activities in accordance with applicable QA procedures and instructions.

6. Regularly reporting to the Director of Quality Assurance the status of quality activities being performed.

7. Initiating "stop work" action at the site, when appropriate. This is further described in Section 17.1.10.2.1.

The QA Supervisors maintain the necessary independence to perform QA activities by reporting directly to the Director of Quality Assurance. Organizational independence from those performing actual work will be maintained.

Personnel performing verification of conformance to established requirements are members of the Quality Assurance Department or their designee. This department is headed by the Director of Quality Assurance, who reports directly to the President of NMPC.

Personnel performing the work being verified (nuclear engineering, nuclear generation, Purchasing, Materials Management, etc) report to other vice presidents.

The Manager Quality Assurance - Nuclear exercises control and direction of NMPC's Operations Nuclear Quality Assurance program by:

1. Being the highest position within the QA Department devoted exclusively to operations nuclear quality assurance activities.

2. Having the responsibility to ensure implementation of the NMPC nuclear policy and procedures established by the Director of Quality Assurance.

3. Having the responsibility to advise the Director of Quality Assurance of serious quality assurance concerns regarding identified nuclear problems.

The Manager Quality Assurance - Services provides support for the Quality Assurance-Nuclear unit by having the responsibility to:

1. Conduct corporate QA audits and provide a trend analysis program.

2. Recommend corporate QA Department procedures and policy to the Director of Quality Assurance for his approval.

3. Coordinate QA Department training.

4. Advise the Director of Quality Assurance and the Manager of Quality Assurance - Nuclear of serious quality assurance concerns regarding identified nuclear problems.

17.1.1.2.3 Quality Assurance Staff

The QA staff for Unit 2 consists of those members of the QA Department who are assigned by the QA Supervisors/Managers. Some of the duties of the staff include:

1. Conducting audits of the various NMPC departments, architect-engineers, contractors and subcontractors, including QA groups within these organizations.

2. Preparing and updating policy manuals, certain procedures, and instructions necessary to implement the QA program.

3. Reviewing the procedures, programs, and results of the various organizations performing the quality activities within or for NMPC, including the incorporation of hold or "witness" points therein.

4. Trending of quality-related problems.

variety of disciplines and backgrounds in power plant technology. Support in plant chemistry, health physics, fueling and refueling operations, and maintenance support, as required in nuclear, mechanical, structural, electrical, thermal-hydraulic, and instrument and control engineering are provided. Specific headquarters support group descriptions are discussed in Chapter 13.

Most design-related requests (after commercial operation) are relayed from the Station Superintendent through the Manager Nuclear Engineering, who assigns appropriate engineering support groups the design responsibility and/or hires a vendor or contractor to perform the work. Conceptual designs are formulated and sent to the site for approval after engineering approval. Conceptual site approval is made by the Station Superintendent after review by the appropriate site discipline. Final design is provided by Engineering for review by the appropriate site discipline, the Station Superintendent, and the SORC, and is approved by the General Superintendent Nuclear Generation and reviewed by the SRAB.

Any design-related activities not performed as described above are performed onsite or controlled onsite. Such activities are controlled in a similar manner except that technical review and approval and procurement are maintained by site personnel, with Engineering acting as a consultant if requested by the Station Superintendent.

17.1.1.2.5 Nuclear Construction

The Project Director has the overall responsibility for project management of Unit #2. The project organization is shown on Figure 13.1-2. The project management efforts include management of construction, design, and support for turnover of plant equipment and systems to Nuclear Generation for preliminary, preoperational and Startup Testing (fuel load). These activities are governed by the Project Manual and Procedures for Unit #2.

17.1.1.2.6 Purchasing

The Vice President Purchasing reports directly to a Senior Vice President and is responsible for formulating, establishing, and enforcing compliance with procurement requirements. The Vice President Purchasing and his staff are responsible to ensure that all applicable procurement documents and changes are reviewed and accepted by the QA Department.

Please change to read as follows:

17.1.10.1.1 Implementation

Inspections are conducted but are not limited to:

1. The contractor's manufacturing facility.
2. Receipt inspection at the site.
3. Installation inspection.
4. Inservice inspections.
5. Operations inspections.
6. Corrective maintenance.
7. Preventative maintenance.

At Nine Mile Point Unit #2 Site, Quality Control is responsible to perform or arrange receipt inspection. Normally, inspection will be performed by Quality Control personnel although qualified and appropriately certified independent personnel from other departments or outside contractors may be used.

Instructions for inspection are documented and are furnished to inspectors prior to an inspection activity. Equipment used in an inspection operation is controlled in accordance with Section 17.1.12. The Engineering or QA Department evaluates and determines the accuracy requirements.

Completion of inspection and/or certification that all inspection operations have been performed shall be provided consistent with the requirements of the inspection. Responsibility for verification of inspection shall be accomplished by the QA Department prior to placing the equipment into service.

Records of inspections are maintained by contractors in accordance with their procedures and with NMPC specification requirements. Records required prior to the use or installation of the inspected item are to be shipped with the item, or as specified.

QA audits or surveillances provide assurance that fabrication, receiving, installation, maintenance, and inservice inspections are performed in accordance with written approved procedures.

Most inspections are either performed by QA Department personnel or by agents under contract; other inspections are performed by the Instrument and Controls Department, with periodic surveillance by the QA Department.

If inspections associated with normal operations of the plant (such as routine maintenance, surveillance, and tests) are performed by individuals other than those who performed or directly supervised the work, but are within the same group, the following controls must be met:

1. The quality of the work can be demonstrated through a functional test when the activity involves breaching a pressure-retraining item.

Measures are established within test programs to ensure that test performance and test results are documented and evaluated and that test requirements have been satisfied by predetermined qualified personnel.

Prototype and preinstallation tests are specified in the specifications and reviewed by NMPC's responsible engineer and the appropriate QA Department staff member in accordance with Sections 17.1.3 and 17.1.4. Specified prototype and preinstallation tests conducted in vendors' shops are witnessed, inspected, or audited by NMPC and/or their agent. NMPC may also participate in "notification point" or "hold point" tests. Specified prototype and preinstallation tests performed in the field are witnessed, inspected, or audited by NMPC and/or their agent.

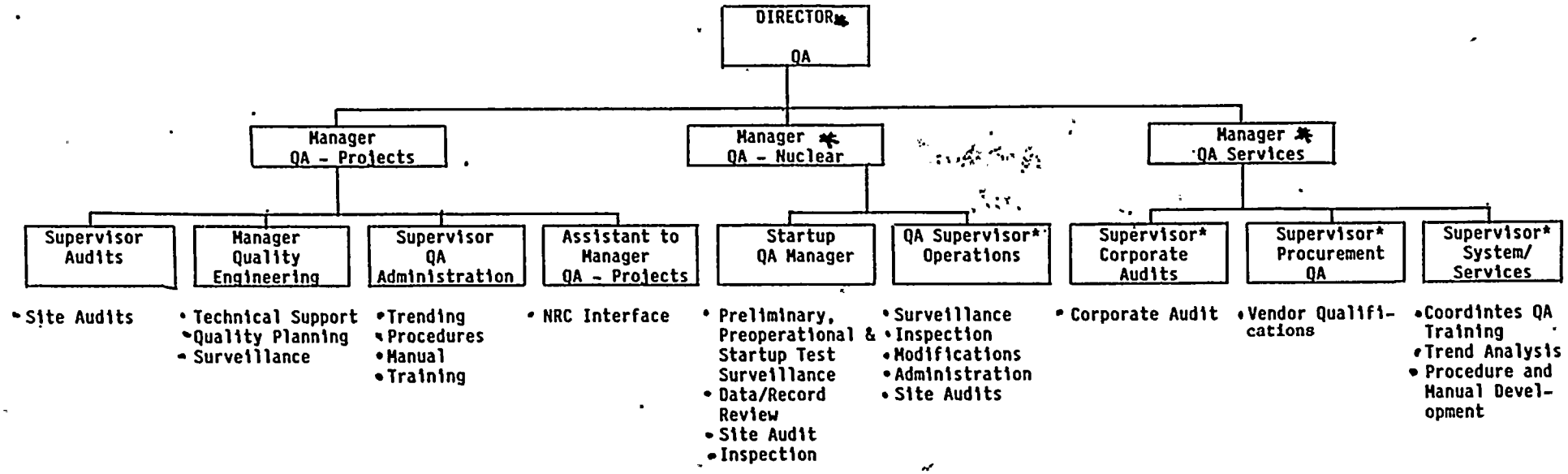
17.1.11.1.1 Preliminary, Preoperational, Startup and Operational Tests

Station Operations personnel perform necessary preliminary, preoperational, startup and operational tests in accordance with guidelines established in both the Startup and Site Administrative procedures. Test procedures are prepared and reviewed by Station Operations personnel in accordance with these procedures.

Preliminary testing is that phase in the test program which is performed prior to preoperational testing to verify individual components or subsystems and set points function correctly. These tests serve as a prerequisite to preoperational test.

Preoperational testing is that testing necessary to initially verify that a structure, system, or component, or modification thereto, meets certain design and performance requirements prior to placing that structure, system, or component into commercial operation. Preoperational testing may include some tests that must be run while the unit is operating. Therefore, preoperational test procedures must define the basis for completion of the test, thus establishing the point at which the structure, system, or component is in commercial operation. Preoperational test procedures are reviewed for QA adequacy by the QA Department and approved by the General Superintendent Nuclear Generation, or his designee, prior to use.

Operational testing is testing conducted to establish that a structure, system, or component placed into commerical operation continues to meet specified requirements, including those contained in the Technical Specification. These procedures are reviewed and approved by the SORC prior to implementation.

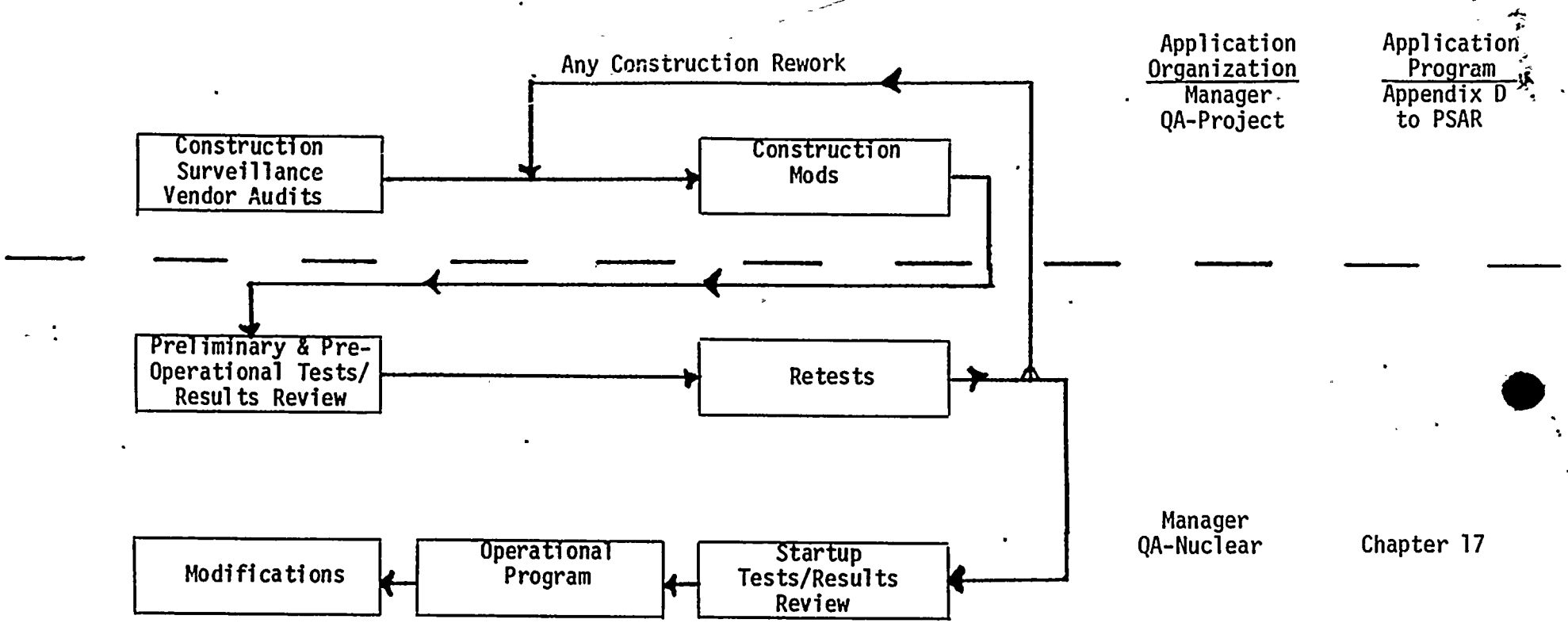


*This group is part of the operational QA organization.

Figure 17.1-1

QA NUCLEAR ORGANIZATION DURING CONSTRUCTION, PRELIMINARY TEST, PREOPERATIONAL TESTING, STARTUP TESTING, OPERATIONS

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT UNIT #2
FINAL SAFETY ANALYSIS REPORT



Notes:
1. This line designates the applicable QA Manager and QA Program.

Figure 17.1-2

APPLICABLE QA PROGRAM AND ORGANIZATION USED DURING PRELIMINARY TESTING/CONSTRUCTION, PREOPERATIONAL TESTING AND STARTUP TESTING/OPERATIONS

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT UNIT #2
FINAL SAFETY ANALYSIS REPORT