

Docket No. 50-410

FEB 12 1985

MEMORANDUM FOR: Richard W. Starostecki, Director
Division of Project and Resident Programs

THRU: Thomas M. Novak, Assistant Director
Division of Licensing

FROM: Mary F. Haughey, Project Manager
Licensing Branch No. 2
Division of Licensing

SUBJECT: NRR SALP INPUT - NINE MILE POINT NUCLEAR STATION UNIT 2

Enclosed is NRR input for the March, 1985 SALP Board meeting for Nine Mile Point Nuclear Station Unit 2. As discussed in the enclosure, our evaluation was conducted according to NRR Office Letter No. 44 dated January 3, 1984 and NRC manual chapter 0516, Systematic Assessment of Licensee Performance.

Mary F. Haughey, Project Manager
Licensing Branch No. 2
Division of Licensing

Enclosure: As stated

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THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT

LECTURE NOTES

PHYSICS 311

CLASSICAL MECHANICS

BY

JOHN H. COOPER

PHYSICS DEPARTMENT

UNIVERSITY OF CHICAGO

CHICAGO, ILLINOIS

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PHYSICS DEPARTMENT

UNIVERSITY OF CHICAGO

CHICAGO, ILLINOIS

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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for Edward J. Wale
Mary F. Haughey, Project Manager
Licensing Branch No. 2
Division of Licensing

Enclosure: As stated





UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Docket No. 50-410

FACILITY: Nine Mile Point Nuclear Station Unit 2
LICENSEE: Niagara Mohawk Power Corporation
EVALUATION PERIOD: October 1, 1983 to January 31, 1985
PROJECT MANAGER: Mary F. Haughey

I. INTRODUCTION

This report contains NRR's input to the SALP review for the Nine Mile Point Nuclear Station Unit 2 (NMP-2). The assessment of the licensee's performance was conducted according to NRR Office Letter No. 44, NRR Inputs to SALP Process, dated January 3, 1984. This Office Letter incorporates NRC Manual Chapter 0516, Systematic Assessment of Licensee Performance.

II. SUMMARY

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category (Category 1, 2 or 3) based on a composite of a number of attributes. The performance of the Niagara Mohawk Power Corporation in the functional area of Licensing Activities is rated Category 2.

III. CRITERIA

The evaluation criteria used in this assessment are given in NRC Manual Chapter 0516 Appendix, Table 1, Evaluation Criteria with Attributes for Assessment of Licensee Performance.

IV. METHODOLOGY

This evaluation represents the integrated inputs of the Licensing Project Manager (LPM) and those technical reviewers who expended significant amounts of effort on NMP-2 licensing actions during the current rating period. Using the guidelines of NRC Manual Chapter 0516, the LPM, each reviewer and their middle management applied specific evaluation criteria to the relevant licensee performance attributes, as delineated in Chapter 0516, and assigned an overall rating category (1, 2 or 3) to each attribute. The reviewers included this information as part of each Safety Evaluation Report transmitted to the Division of Licensing. The LPM, after reviewing the inputs of the technical reviewers, combined this information with her own assessment of licensee performance and, using appropriate weighting



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factors, arrived at a composite rating for the applicant. This rating also reflects the comments of the NRR Senior Executive assigned to this Nine Mile Point 2 SALP assessment. A written evaluation was then prepared by the LPM and circulated to NRR management for comments. These comments were incorporated in the final draft.

The basis for this appraisal was the applicant's performance in support of licensing actions that were either completed or had a significant level of activity during the current rating period. These actions are as follows:

- (1) Responses to staff requests for information in both the area of safety and environmental reviews.
- (2) Responses to outstanding and confirmatory issues in the Draft Safety Evaluation Report (DSER).
- (3) Comments to the Draft Environmental Statement (DES)

V. ASSESSMENT OF PERFORMANCE ATTRIBUTES

The applicant's performance evaluation is based on a consideration of five of the seven attributes specified in NRC Manual Chapter 0516. These are:

- Management Involvement and Control in Assuring Quality
- Approach to Resolution of Technical Issues from a Safety Standpoint
- Responsiveness to NRC Initiatives
- Staffing
- Training

For the remaining two attributes (enforcement and reportable events) no basis exists for an NRR evaluation for the functional area of Licensing Activities.

Licensing Activities

1. Management Involvement and Control in Assuring Quality

During the rating period of October 1, 1983 through January 31, 1985 the management of NMPC was involved in many phases of licensing activity. Decision-making was usually at a level that insured adequate management review. However, there were some areas, as noted below, where increased management attention was requested during this period.



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- A. During the review of the instrumentation and control area of NMP-2 the plant drawings were noted to be inconsistent with the FSAR. The applicant, when requested to address these differences responded to the specific identified concerns in a letter dated June 21, 1984.
- B. In order to expedite responses to NRC staff concerns, the applicant's responses were submitted for review under affidavit signed by a Vice President of NMPC. These letter responses were then to be incorporated into the FSAR by amendment. The NRC noted to the applicant that in at least one instance the response had not been fully reproduced in the FSAR. The applicant agreed to perform a review of letters submitted under affidavit against the information incorporated in the FSAR. The applicant has not yet submitted to the NRC the complete results of that review. Further FSAR amendments were also to be subjected to this review process.

The applicant submitted comments to the draft SER and the DES. In some cases these comments did not agree with the FSAR or the ER, as applicable.

In some instances the staff elected to perform the review by conducting audits. Those audits involved visits to the NMP-2 site, NMPC offices and/or the Architect/Engineer's offices. The appropriate level of NMPC management was generally present at these audits to assure a smooth-running review. The information provided by the applicant at these audits was generally complete and thorough.

On the basis of the above discussion, an overall rating of 2 is assigned to this category.

2. Approach to Resolution of Technical Issues from a Safety Standpoint

The applicant's management and its staff have demonstrated sound technical understanding of issues involving licensing actions. Technical expertise has been demonstrated in areas involving licensing actions. In a number of areas, such as fire protection, the applicant's commitments reflected a conservative approach toward providing an adequate level of safety. However, in the area of geology, technical approaches were not always complete and extensive NRC staff effort was required in order to reach resolution.

When the applicant has deviated from staff guidance, the applicant has generally provided good technical justification for such deviations.



NMPC has taken the initiative in correcting a number of technical problems. For example, NMPC is cladding the interior surfaces of MSIV valve bodies with a corrosion resistant alloy, Inconel 625, in an effort to eliminate corrosion concerns identified for this type valve during preoperational testing at Liebstadt, Switzerland.

On the basis of the above discussions, an overall rating of 2 is assigned to this category.

3. Responsiveness to NRC Initiatives

This SALP rating period has required a significant activity in licensing. Responses have been required to Requests for Information following docketing of the FSAR and ER; Responses to open and confirmatory issues to the draft Safety Evaluation Report (SER); comments to the Draft Environmental Statement (DES); and any additional staff concerns resulting from the responses to draft SER concerns.

Responses in the environmental area have been technically sound and thorough in almost all cases. These responses have also been generally timely.

The major licensing activity for NMP-2 during this SALP rating period has been in the safety area. In the safety area a number of responses were received late enough to effect the licensing schedule. Notably, responses to outstanding issues noted in the draft SER in the areas of containment systems were not submitted until the end of September 1984 or later (the date requested in the draft SER transmittal letter was no later than August 1, 1984).

A number of responses submitted were lacking in thoroughness or depth, or significantly differed from proposed responses discussed during meetings or conference calls (i.e. Power Systems, Geology, Procedures). These submittals required re-submission in order to obtain acceptable resolutions.

Following discussions between NRC and NMPC management, NMPC's responsiveness did improve in the last two months of the rating period.

The applicant was specifically requested in the draft SER transmittal letter (May 15, 1984) to identify any areas in Section 7 (I&C) where the draft SER did not agree with the NMP-2 design within 60 days. This request was made because of NRC staff concerns over differences between the FSAR and NMP-2 I&C drawings. While the applicant did respond in June 1984 to specific concerns that had been identified by the NRC in earlier meetings, the results of the applicant's review of Section 7 of the draft SER were not transmitted to the NRC until October 11, 1984 following specific requests to NMPC management for this information.

On the basis of the above discussion, the overall rating of 3 is assigned to the category.



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4. Enforcement

No basis exists for an NRR evaluation of this attribute.

5. Reportable Events

No basis exists for an NRR evaluation of the attribute.

6. Staffing

NRR evaluation of staffing for operation is still ongoing and therefore no conclusion can be made in this area. Staffing provided during meetings and audits was generally acceptable.
Category 2

7. Training

The NRR evaluation of the applicant's training program indicated that it will effectively maintain fully qualified plant personnel to operate the plant and maintain the plant safety.
Category 2

Conclusion

Category 2



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Other Functional Areas

1. Soil and Foundations

Problems were encountered during the review of the geology area for NMP-2 as indicated in the Licensing section. However resolution has been reached in this area.

Category 2

2. Containment and other Safety Related Structures

During the month of December, 1983 the NRR staff performed the structural audit at the Stone and Webster Engineering Corporation (SWEC) offices in Cherry Hill, New Jersey. While some items remain confirmatory there are no outstanding concerns in this area at present.

Category 2

3. Piping Systems and Supports

The applicant has extended the break exclusion zone for the RWCU lines to the MOV located over 50 feet from the containment wall. The NRC staff has indicated that the applicant has extended the use of break exclusion in this case beyond the intent of the SRP (NUREG-0800). The NRC staff has requested the applicant to review the effects of a postulated break at the junction of the RWCU line for pipe whip and jet impingement.

This is the only issue still outstanding in this area.

Category 2

4. Safety Related Components

The NRC is presently reviewing the applicant's request for an exception to the ASME Code for an MSIV post weld heat treatment: (55(e)-84-37)

The NMPC approach to resolving corrosion problems on the MSIV is discussed in the Licensing Section.

5. Electrical Power Supply and Distribution

There have been discrepancies between the applicant's responses to separation criteria concerns resulting from the CAT audit and the applicant's responses to this issue when addressing NRR inquiries



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in this area. NRR is presently coordinating with Region I to ensure a consistent review is being performed.

Category 2

6. Instrumentation and Control Systems

Concerns in this area were addressed in the Licensing section.

Category 2

7. Plant Cleanliness and Housekeeping

Earlier in the assessment period, housekeeping at NMP-2 was at less than satisfactory state for a facility at this point in construction. However, the applicant has improved plant cleanliness and maintained it at an acceptable level throughout the balance of the assessment period.

Category 2



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Information to be Added to
Section V of the SALP Report - "Supporting Data and Summary"

1. NRR Licensee Meetings

A large number of meetings were held with the applicant in Bethesda to resolve/discuss staff concerns. These are documented by meeting summaries.

2. NRR Site Visits & Audits

Structural site visit and audit at SWEC offices
MEB audit at SWEC offices
ICSB visit to GE offices
ASB/RSB site visit
Second environmental site visit

3. Licensing Documents Issued

DES
Draft SER
SER to be issued February, 1985

4. Applicant Responses

- a. Responses to requests for information in the safety and environmental areas.
- b. Letters & FSAR updates to respond to draft SER concerns.
- c. Comments to the DES.

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