

August 21, 1985

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

SUBJECT: Nine Mile Point Unit 2  
Response to CAT Inspection Report  
Violation G.7 83-18-92

Dear Mr. Starostecki:

This letter is submitted as a follow-up and clarification of the NMPC CAT response dated May 5, 1984 and letter NMP2L0113 dated July 27, 1984 regarding the subject violation. This letter addresses the questions raised by the NRC Resident Inspector during his recent review of this item pertaining to the resolution and review for significance of auditor comments and observations.

Following are Mr. Gramm's specific questions and Niagara Mohawk's responses thereto:

- How was the cutoff date for compiling the list of 186 items established? What is the significance of the cutoff date?  
December 9, 1983, the date of the CAT Inspection exit meeting, was used as the cutoff date to determine the final list of 186 open items germane to the CAT Inspection. Items that were not closed by this date were included in the list.
- How/why were the GE items excluded from the list of 186 open items identified as auditor comments/observations?

During the NMPC review of NRC (R.C. DeYoung) letter of March 20, 1984 specifically Enclosure 2, last paragraph on page VIII-3, we interpreted the statement that "There were more than 150 open auditor comments and observations regarding audits performed of areas of NMPC activities" to be referring to an internal NMPC QA memo dated October 6, 1983 that identified more than 150 open items involving NMPC audits of SWEC.

Even though the GE open items were not part of the direct effort in response to the CAT Inspection concern, a concurrent and equivalent effort was put forth on behalf of these GE items to close out the open items.

- How were all the auditor comments/observations reviewed for classification as NR's or potentially reportable 50.55(e)'s? In addition, did this review include the GE items which were tracked separately? Provide a completion date for all remaining open GE items.

Each of the audit open items was reviewed to determine if it contained a nonconforming condition. None of the SWEC and GE open items contained a nonconforming condition. Since no open items were identified as nonconforming, none were potentially reportable under 10CFR50.55(e).

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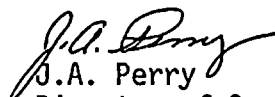
The GE items that were open as of 12/9/83, were tracked separately from the 186 SWEC items. Currently all but one of these open items has been closed. The remaining GE open item is expected to be completed by November 1, 1985.

- How will NMPC preclude the situation in the future where correspondence from NMPC to the NRC is open to interpretation by the NRC.

Correspondence from NMPC to the NRC undergoes an extensive review process designed to verify the accuracy of the statements made therein and to eliminate potential ambiguities. This review process identifies and eliminates ambiguous wording in the majority of cases. Accordingly, we believe that the misunderstanding that occurred in this case is an isolated incident. Nonetheless, we have advised personnel involved in the review process to be especially sensitive to potential ambiguities in order to minimize future misunderstandings.

Subsequent to the CAT Inspection, actions have been taken to eliminate auditor comments and observations from Niagara Mohawk Quality Assurance Audit Reports. Currently, programmatic deficiencies identified during an audit are to be identified on Corrective Action Requests (CAR's). Hardware nonconformances identified during an audit are referred to the responsible Quality Control organizations for processing.

Very truly yours,



J.A. Perry  
Director of Quality Assurance

JAP/ams

cc: W.D. Baker  
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