

March 3, 1986
(NMP2L 0640)

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

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

Dear Mr. Starostecki:

Enclosed is our detailed response to the Notice of Violation dated January 21, 1986 and accompanying Inspection Report 85-42.

Very truly yours,

C. V. Mangan
C. V. Mangan
Senior Vice President

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Enclosure

xc: Director of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

R. A. Gramm, Resident Inspector

Project File (2)

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Violation A

Violation:

As a result of the inspection conducted on November 12-15 and on December 4, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

10CFR50, Appendix B, Criteria V states, in part, that: activities affecting quality shall be prescribed and shall be accomplished in accordance with these instructions: Specification E-061A, Appendix J, establishes a 3" bend radius for NJP-29 cable.

Contrary to the above, on November 13, 1985, cables [conduits] 2CX998A [2CX998GA] through H, J, K, M and P through R were identified to have bend radii less than 3".

Response:

The following is submitted in response to this violation:

The flexible conduits addressed by the NRC inspector had been installed and inspected satisfactorily prior to the NRC visit. The radius violations apparently were caused by workmen who used the conduit as a hand hold or stepping point.

Corrective Actions:

All flexible conduits listed by the Nuclear Regulatory Commission as having less than the minimum specified bend radii were documented on Nonconformance and Disposition Reports 14209 and 14210.

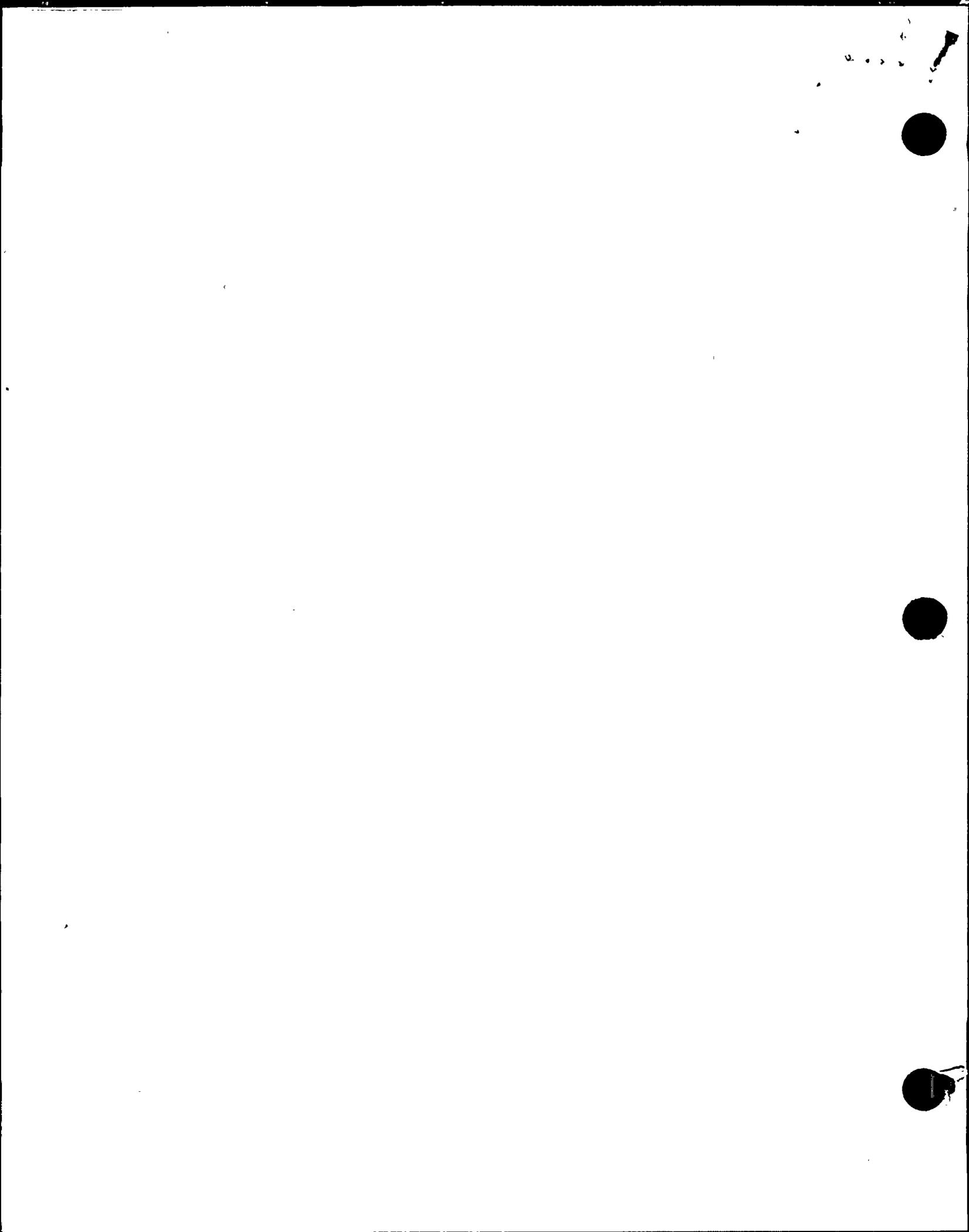
An inspection of other flexible conduit was performed and the deficiencies were documented on Nonconformance and Disposition Reports 14269 and 14270.

All affected conduits and associated cables will be corrected in accordance with the disposition of the Nonconformance and Disposition Reports. The work should be completed by April 1, 1986.

Preventive Action:

Training Bulletin #16 was reissued on December 10, 1985 addressing the importance of protecting electrical raceway and cables during construction activities, and it was noted on the cover letter that disciplinary action will be taken against violators. Further, this issue was discussed at training sessions attended by craft and support personnel between December 10, 1985 and January 28, 1986.

To provide further assurance that flexible conduits will not be damaged, protective barriers were constructed inside the primary containment in areas where flexible conduits were judged to be susceptible to this type of damage.



Violation B

Violation:

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed by documented instructions and procedures, and that these activities be performed in accordance with the instructions and procedures. Specification E-061A, Installation of Electrical Equipment, requires that tension monitoring devices be used on horizontal manual conduit/duct pulls greater than 25 feet between pull points and bends exceeding 270 degrees.

Contrary to the above, on or before November 12, 1985, Neutron Monitoring cabling was installed in conduit runs exceeding 25 feet in length and 270 degrees in bends without pull tensions monitoring devices. Further, cable installation techniques were employed which were not documented into procedures or instructions.

Response:

The following is submitted in response to the apparent violation:

We agree with the Commission that no specific instructions addressing "pushing" cable in conduit were included with the electrical specification. We also agree that tension monitoring devices were not used for the cable "push" installation. Although no specific instruction was provided regarding this unique installation, Engineering, QC and contractor representatives participated in the field discussions and initial field trial methods. A specification revision, however, was not prepared.

Corrective Action:

Mock up tests, witnessed by an NRC inspector, were performed to confirm the quality of the installation. Based on the results of these tests, we feel no further corrective actions are required.

Preventative Action:

As additional clarification to the electrical installation specification, a cable "push" method has been established. This method will be incorporated in the electrical installation specification by an Engineering and Design Change Request Number F02608.

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