

April 30, 1986
(NMP2L 0670)

Mr. R. W. Starostecki, Director
U.S. Nuclear Regulatory Commission
Region I
Division of Reactor Projects
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 March 31, 1986 and accompanying Inspection Report 86-01.

Very truly yours,

T. E. Lempges
T. E. Lempges
Vice President
Nuclear Generation

CVM/GG/cia
(1543H)

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

R. A. Gramm, NRC Senior Resident Inspector

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RESPONSE TO NOTICE OF VIOLATION

Violation:

As a result of the inspection conducted on January 13, 1986 to February 21, 1986 and in accordance with the General Statement of Policy and Procedure of Enforcement Actions (Enforcement Policy), 10 CFR 2, Appendix C (1985), the following violation was identified.

10 CFR 50, Appendix B, Criterion V and XI and the Nine Mile Point, Unit 2 FSAR Sections 17.1.5 and 17.1.11 require that Preoperational Test Procedures include appropriate acceptance criteria to assure satisfactory test accomplishment. Startup Administrative Procedures 102, 106A, and 106B require that preoperational test acceptance criteria be derived from the Final Safety Analysis Report and that the Joint Test Group is responsible for procedure approval.

Contrary to the above, on January 24, 1986 Preoperational Test Procedure N2-POT-100B was not in conformance to FSAR Table 14.2-126 as acceptance criteria regarding the diesel air start system were not included in the Joint Test Group approved Preoperational Test Procedure.

Response:

The violation occurred because a portion of the acceptance criteria in FSAR Table 14.2-126 was inadvertently overlooked during the preparation and approval of Preoperational Test Procedure N2-POT-100B.

Corrective Action:

The acceptance criteria in the test procedure has been revised to include:

- 1) Each air compressor is capable of recharging the receivers from minimum to maximum operating pressure in 30 minutes or less, and;
- 2) The starting air supply is capable of starting the diesel generator five times from the minimum operating pressure without recharging.

Preventive Action:

The Manager-Startup and Test has established a group which has as its primary objective the review of the Pre-op Procedures for inclusion of FSAR commitments. This effort includes the review of previously approved Pre-op Procedures.

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