

APPENDIX A

NOTICE OF VIOLATION

Nine Mile Point Station, Unit 2

License No. CPPR-112

As a result of the inspection conducted on April 14-25, 1986, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

1. Criterion V of Appendix B to 10 CFR 50 requires that activities affecting quality be accomplished in accordance with instructions and procedures of a type appropriate to the circumstances.
  - a. Nine Mile Point Start-Up Administration Procedure No. N2-SAP-117 requires, in section 5.0, that all work, by organizations other than Start-Up and Test, on equipment and systems released to NMPC, be conducted in accordance with approved engineering design documents via a Work Control Report (WCR). In addition, Section 2.0 of Specification NMP2-301C, for Field Fabrication and Erection of ASME III piping (Classes 1, 2, 3) requires that all hoisting forces imposed on building or pipe support steel be reviewed prior to making a lift to insure the adequacy of the supporting member.
  - b. SWEC's Construction Site Instruction No. CSI 20.16 for Protection of Permanent Plant Equipment requires in section 4.3 that cable trays, piping supports or other supports not be used to support scaffolds or handrails.

Contrary to the above, the following two activities, performed by construction personnel, were not accomplished in accordance with the above procedures:

- (1) The blind flange for strainer No. 2RHS\*STRT-1B was rigged from a 3" OD safety related piping No. 2RHS-003-218-4. The chainfall was attached to the line 1'-2" west of permanent pipe Support No. BZ-71XW.
- (2) Scaffolding handrail, in the south auxiliary bay at elevation 175, was found to be tied from safety related pipe support variable spring hanger no. BZ-71BW-1.

This is a Severity Level V violation (Supplement II).

2. 10 CFR 50, Appendix B, Criterion V states that activities affecting quality shall be accomplished in accordance with appropriate drawings.

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Reactor Controls, Inc. drawing no. NMP-027-SH-A, "General Notes for Scram Header Hangers 90° to 270° Sides" requires a minimum gap of 1/16" and 1/32" for pipe supports 1A and 11A respectively.

Contrary to the above, on April 24, 1986, pipe support 1A was found to have no measureable gap in the lateral direction, and support 11A had no measureable gap in vertical direction.

This is a Severity Level IV violation (Supplement II).

3. 10 CFR 50, Appendix B, Criterion V states, requires that activities affecting quality shall be accomplished with documented instructions, or procedures.
- a. Electrical Installation Specification, E061A, revision 1, Section 3.47, paragraph 3.2.4.7, requires instrument cables or control cables to be supported in the vertical direction at twenty-five (25) foot intervals by Kellem's Grips.

Contrary to the above, on April 16, 1986 the inspector observed vertical cables, routed through cable trays 2TK522G and 2TD567G in the control building, with lengths greater than twenty-five feet which were not supported by Kellem's grips.

- b. Specification E061A, paragraph 3.1.5.18, stipulates that where a duct terminates with an above ground extension, markers shall be applied.

Contrary to the above, on April 23, 1986 the inspector observed a flexible conduit which extended above the floor from a duct to the service water pump 2SWP\*P1A motor, which did not have an identification marker.

- c. 10 CFR 50 Appendix B, Criterion V requires that activities shall be accomplished in accordance with documented procedures.

Instrumentation Installation Specification C081A, Revision 5, requires instrument impulse lines to be identified where the line passes through walls or floors on both sides of the wall or floor.

Contrary to the above, on April 22, 1986 three instrument impulse lines, that penetrate the reactor primary containment drywell wall at penetrations Z-316-2, Z-318-3, and Z-322-4, were observed to be not identified on either side of the wall. These lines are connected to instrument transmitters used for the reactor protection system.

The above violation is a Severity Level V (Supplement II).

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Pursuant to the provisions of 10 CFR 2.201, Niagara Mohawk Power Corporation is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.



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