

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-410/86-22

Docket No. 50-410

License No. CPPR-112

Licensee: Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Facility Name: Nine Mile Point Unit 2

Inspection At: Scriba, New York

Inspection Conducted: April 30-May 9, 1986

Inspectors: *R. W. Winters* 6/6/86
R. W. Winters, Reactor Engineer date
J. G. Hunter III 6/9/86
J. G. Hunter III, Reactor Engineer, QA date
Section, OB, DRS
Approved by: *P. K. Eapen* 6/11/86
Dr. P. K. Eapen, Chief, Quality Assurance date
Section, OB, DRS

Inspection Summary: Routine, Unannounced Inspection on April 30-May 9, 1986
(Inspection Report No. 50-410/86-22)

Areas Inspected: Procurement, Receipt, Storage and Handling, Document Control, and Records Management programs and licensee actions on previous inspection findings.

Results: No violations were identified.

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DETAILS

1.0 Persons Contacted

Niagara Mohawk Power Corporation (NMPC)

- *R. B. Abbott, Station Superintendent
- *D. H. Balduzzi, Superintendent, Records Management
- *C. G. Beckham, Manager, Project Quality Assurance (QA)
- *G. L. Blackburn, Test Group Manager, Startup
- *J. J. Bufis, Test Group Manager
- *K. C. Carter, Unit Supervisor, Records Management
- *G. J. Doyle, NQA-OPS
- *W. J. Hanley, Manager, Contracts and Purchasing
- *L. D. Kassakath, Test Group Manager, Startup
- *R. G. Matlock, Deputy Project Director
- +M. Meehan, Material Control Supervisor
- +R. Miller, Assistant Manager, Nuclear Materials Management
- *W. W. Mural, Associate Senior NCU Technician
- *E. P. Opelski, NQA-OPS
- J. Salmon, Lead Project Engineer
- *D. E. Sandwick, Manager, Information Management
- S. Starowicz, Contract Administrator
- *I. Weakley, Special Projects

Stone and Webster Engineering Corporation (SWEC)

- *B. R. Bulger, Project Engineer
- C. Deban, Document Control Coordinator
- *J. L. Drake, Jr., Startup Special Projects Supervisor
- *B. Kallander, Manager, NMP2 Records Management
- L. Terry, Project QA Manager

General Physics Corporation (GP)

- S. Lessard, Project Engineer
- T. Mogsen, Project Manager

Public Service Commission (PSC)

- *P. D. Eddy, Site Representative

U. S. Nuclear Regulatory Commission (USNRC)

- +*R. A. Gramm, Senior Resident Inspector
- *J. Stair, Reactor Engineer

- *Attended Exit meeting May 9, 1986
- +Attended Exit meeting May 7, 1986

The inspectors also contacted other administrative and technical licensee personnel during the course of the inspection.



2.0 Followup of Previously Identified Items

(Closed) Violation 83-18-86: Ineffective corrective action program for contractor and subcontractor activities.

The licensee required the prime contractor (Stone and Webster Engineering Corporation) to revise their procedure to strengthen the requirements for closing deficiency reports in a timely manner. In addition, the licensee instituted a Quality Performance Management Program (QPMP) to provide quality trends and timely corrective action. This program provided trending on a weekly basis. Through this program trends were identified early and corrective actions were taken before major problems developed.

The Inspector reviewed reports of the QPMP as well as the followup on Master Tracking System program used in Startup and preoperational testing. The Master Tracking System reports are published weekly and they identify all deficiencies as well as items opened and closed in the preceding weeks. These reports also provide information by systems in a manner to facilitate easy trending.

Based on the above review, the inspector concluded that the licensee's actions were adequate to resolve the concern identified in this violation.

This violation is closed.

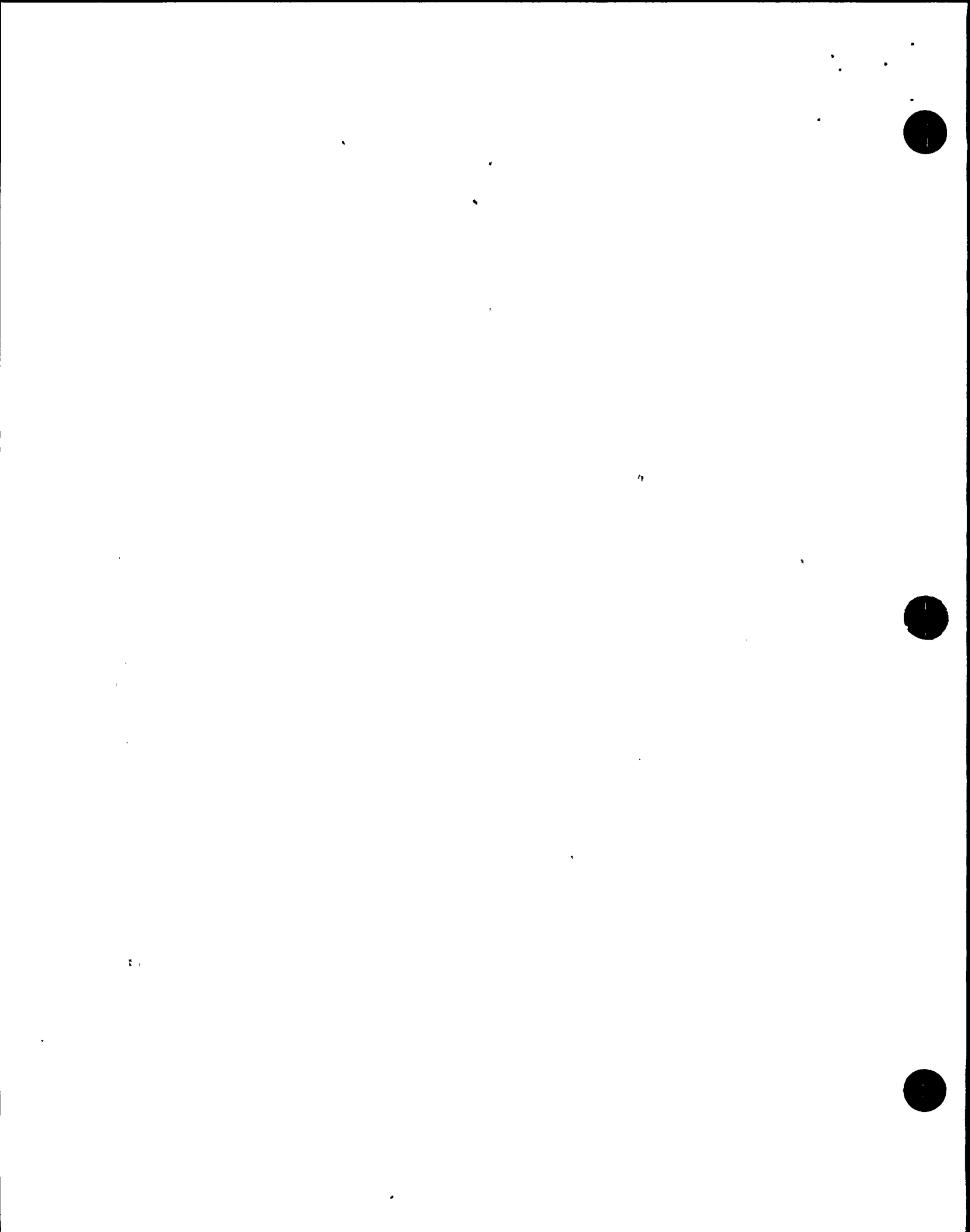
(Closed) Unresolved Item 80-09-01: Pertaining to the development of a program to insure that parts subject to deterioration are identified and inspected to determine that the component will perform its intended function satisfactorily. The licensee has developed such a program to inspect parts subject to deterioration.

The Inspector reviewed a representative sample of the evaluations made in this area and determined that the program was adequate. This unresolved item is closed.

(Closed) Unresolved Item (50-410/84-18-09): This item pertains to the effectiveness of the licensee's corrective action and trend analysis program.

The licensee did not have adequate measures to consolidate the corrective action requests (CARs) involving generic problems; disposition and implement corrective action in a timely fashion; and update inspection plans and procedures.

The licensee reviewed and consolidated seven corrective action requests involving generic problems and one audit findings report in one corrective action request, CAR #84.0177. The CAR was properly dispositioned. Also, through formal and informal meetings, and implementation of the



management actions the number of overdue CARs were significantly reduced from 112 to a manageable number of 35 during the review period. The licensee tracked the overdue responses to the corrective action requests as a Quality Performance Indicator. A review of the licensee's Quality Performance Management Program Trend Analysis Graph (period June 27, 1984 to April 12, 1985) and letter NMQA 1315, dated February 13, 1985 indicated that the licensee's action was adequate.

The licensee also updated the inspection procedures, dispositioned CAR 84-0158 and implemented the required corrective action. In addition, the licensee's agent, Stone & Webster Engineering Corporation, reviewed the QA program of vendors, such as Reactor Control, Inc., ITT-Grinnel, and Johnson Controls, Inc., and revised the applicable procedures, as necessary.

Based on the review of the licensee documentation the inspector determined that the licensee adequately resolved this item. The item is closed.

(Closed) Construction Deficiency Report (50-410/83-00-10): This item pertains to potential 10 CFR 50.55(e) concern regarding uncertified electrical inspector (SWEC) performing quality control activities.

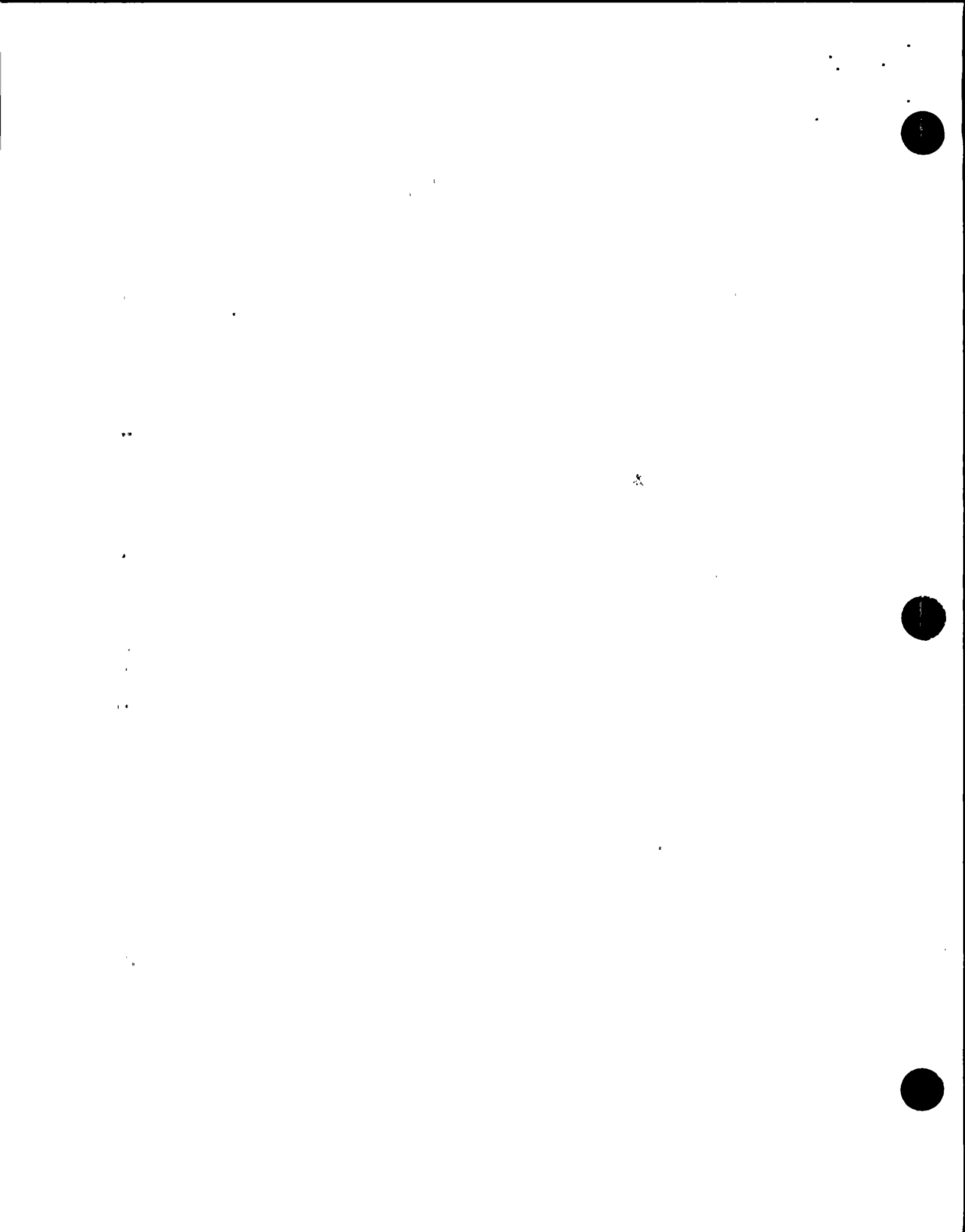
The licensee investigated the matter of certification and qualification of the QC inspector identified through the licensee's QA Surveillance at NMP-2. The licensee reviewed the inspector's certification and qualification documentation as well as SWEC's QC Inspector qualification procedures and methodology. The licensee verified that the inspector was properly certified to perform the assigned inspections in accordance with the SWEC QA program and ANSI N45.2.6-1978 requirements since August 19, 1982. Based on the findings the licensee concluded that a 10 CFR 50.55(e) report need not be made for this concern, as indicated in the licensee's final report to the NRC dated June 3, 1983.

Based on the review of the licensee's disposition, the inspector determined that the licensee has adequately resolved the item. This item is closed.

(Closed) Construction Deficiency Report (50-410/83-00-12): This item pertains to potential 10 CFR 50.55(e) concerning uncertified SWEC QA inspectors performing quality control activities.

The licensee's corrective action was reviewed during the previous NRC inspection (50-410/85-27). The licensee provided additional supporting information for:

- The qualifications, educational background, experience, and the site specific training associated with each uncertified inspector at the time the suspect inspection was performed;



- The type of inspections performed by the QC inspectors in question; and
- The results of the reinspections performed on the accessible hardware.

The inspector reviewed the above additional information provided by the licensee and concluded that this information adequately addresses the concerns identified in NRC inspection 50-410/85-27.

Based on the review of the above information, the inspector determined that the licensee's corrective action is adequate. This item is closed.

3.0 Procurement, Material Receipt, Inspection, and Storage

To assure the effectiveness of the licensee's program for Procurement during the operations phase, the Inspector reviewed the "Procedure for Control of Materials and Services", AP 7.0, Revision 1, effective August 9, 1985 and the implementation of this procedure.

The details of the review are given below:

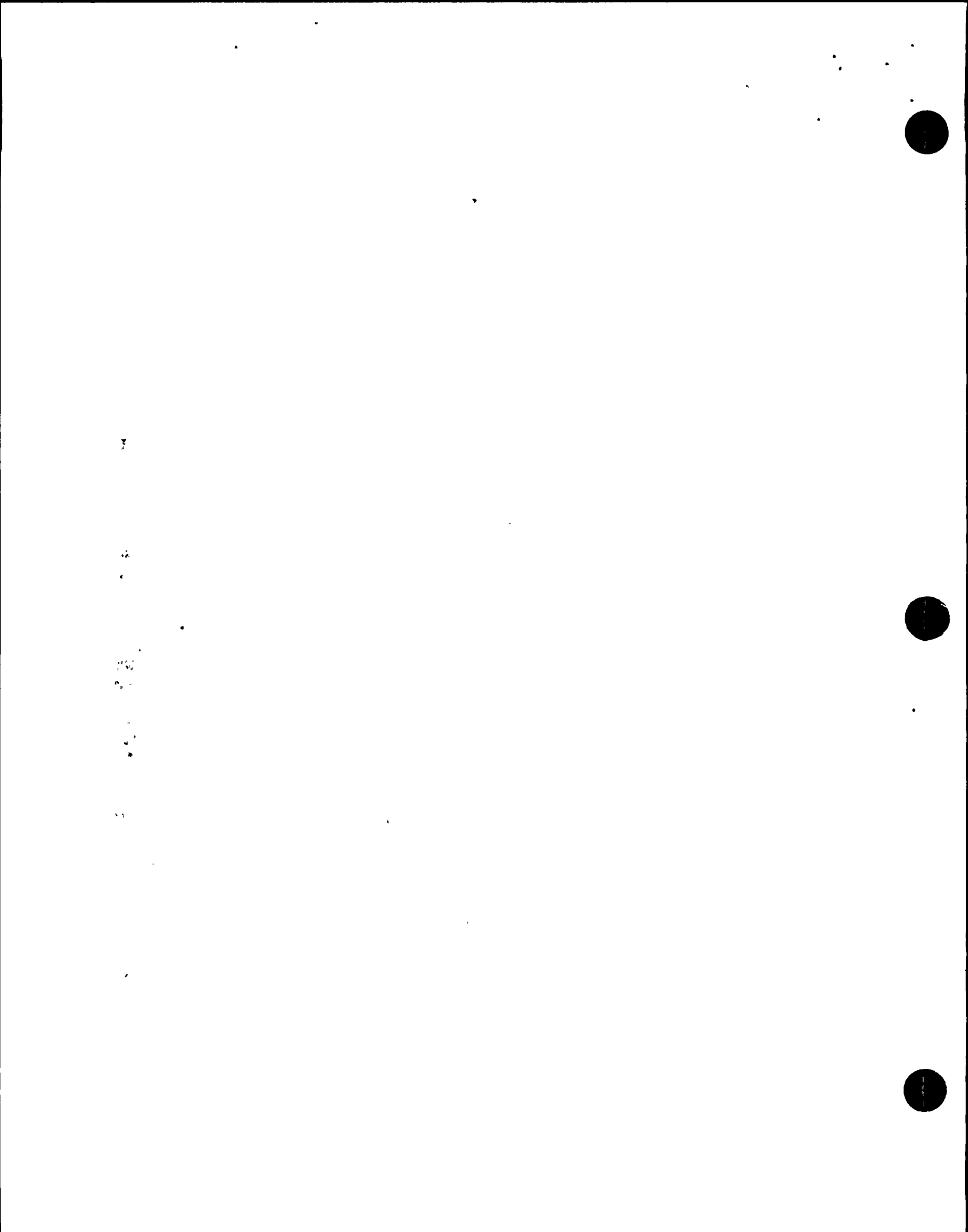
3.1 Procurement Activities

The inspector reviewed purchase orders placed directly by the Licensee and by General Physics, a contractor hired by the licensee to purchase spare and replacement parts.

For nondestructive testing and inspection services the contract was awarded to that vendor who was determined to be the best qualified vendor by the Quality Assurance organization and not to the lowest bidder.

General Physics (GP) has been contracted to purchase spare and replacement parts. To accomplish this GP is using lists of recommended spare parts furnished by Stone & Webster Corporation (SWEC). The quantities recommended have been determined either by the original suppliers or SWEC.

SWEC developed the spare parts lists for each plant system. GP as part of the contract searches these lists to identify identical parts used in different systems and to optimize spares while assuring adequate availability for operation. GP then prepares a Request for Quotation (RFQ) and submits this RFQ to the Licensee's Quality Assurance and Materials Management Section for review and approval. When approved, GP submits the RFQ to vendors for Quotations. For Safety Related equipment only vendors on the licensee's "Qualified Suppliers List" receive copies of the RFQ. Returned RFQ's are sent to the licensee's Quality Assurance organization and the Materials Management Section



for review. From these reviews a vendor is chosen and the quotation from the chosen vendor is returned to GP for preparation of the Purchase Order. When the purchase order is prepared it is sent to the licensee for management and budget approval, and returned to GP for placement.

The Inspector reviewed a representative sample of RFQs and purchase orders in various stages of preparation. A subset of the above sample was used to verify the adequacy of receipt inspection, documentation, storage, and retrievability.

The Staffing was adequate to accomplish the issuance of the purchase order without excessive delays.

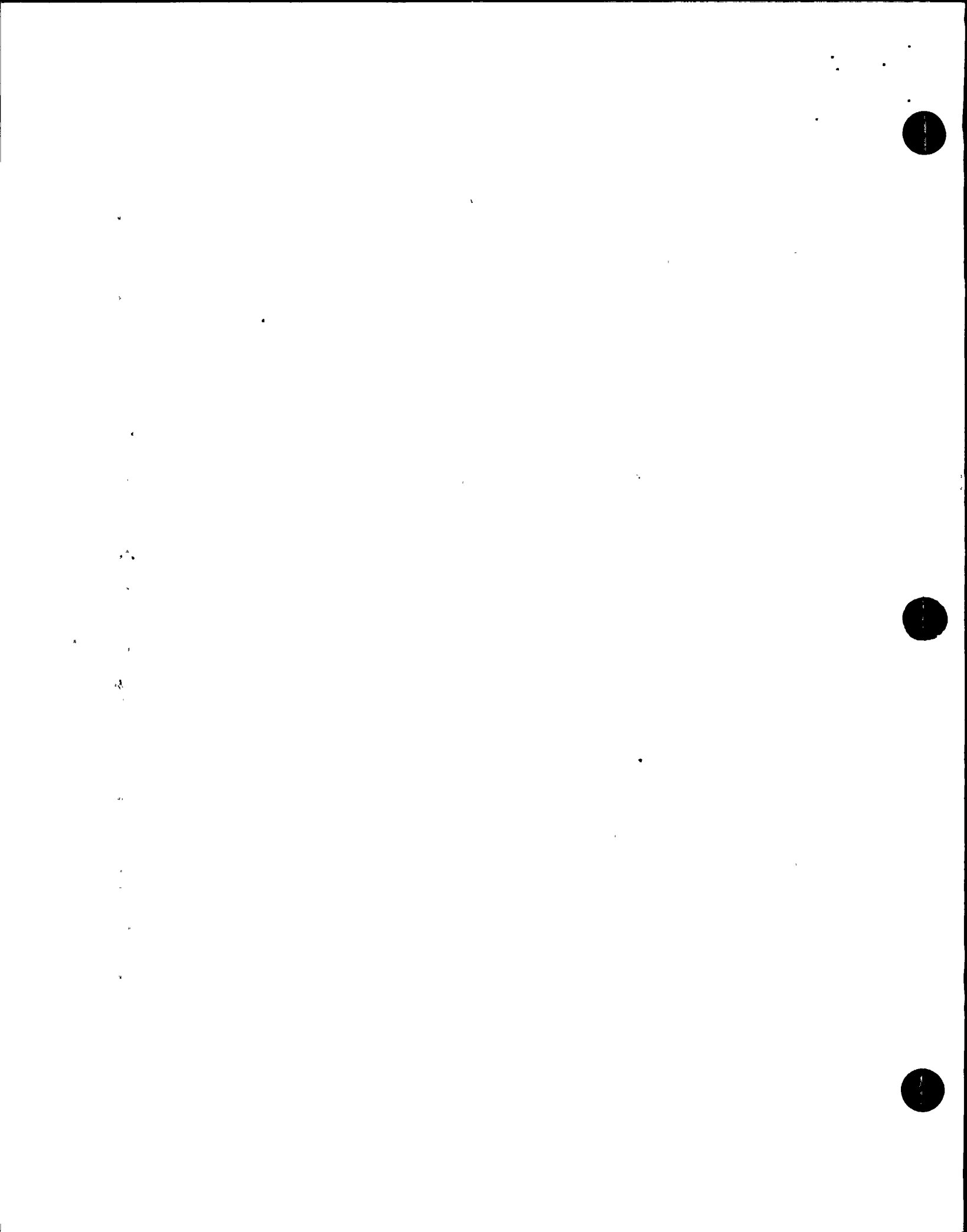
No violations were observed. The inspector found the procurement activities to be adequate to support operation of Nine Mile Point Unit 2.

3.2 Material Receipt, Inspection and Storage

Materials are received onsite in the materials storage building or at the offsite warehouse. Both facilities are part of the Materials Management Organization and have full time Quality Control Receiving Inspectors. Attributes and acceptance criteria used during receipt inspection are as required by the purchase order. Results are recorded on a Materials Receipt Report (MRR). Acceptable material is clearly identified and stored, unacceptable or indeterminate items are clearly tagged and placed in a segregated area. Shelf life is as specified by the product manufacturer, or as required in the appropriate Military Handbook. In the absence of manufacturing data the licensee requires vendors to guarantee that a minimum of 70% of the shelf life remains when the material is received.

The inspector reviewed the offsite warehouse and the onsite materials storage facility. Both facilities met the requirements of ANSI N45.2.2 for level B storage. Inspection reports, documentation including certificates of conformance, manufacturing data such as cure date used for shelf life determination, and MRRs, were readily retrievable and complete for those purchase orders previously identified (in paragraph 3.1 above). Storage locations are provided to the user from a computer. In all cases observed the material was in the location as recorded in the computer.

All material were observed to have the shelf life expiration date clearly marked on the material or its container. In addition, the shelf life expiration dates are tracked in the computer system. The Inspector requested the expiration date information from the computer



and the licensee furnished two reports. The first report indicated the materials that would expire on or before the date requested (by the Inspector) and the second had the same basic information along with the reorder date to remind the user of the lead time for such replacement purchases.

Staffing in both locations was adequate to complete receipt inspection without excessive backlogs.

No violations were observed. The inspector found the licensee's material receipt, inspection and storage activities to be adequate to support operation of Nine Mile Point Unit 2.

4.0 Records Management Program

The basic requirements and guidelines for collection, storage and maintenance of Quality Assurance records are described in:

- 10 CFR 50, Appendix B, Criteria XVII.
- Proposed Technical Specifications, Section 6, Administrative Controls.
- Final Safety Analysis Report (FSAR), Section 17.1.17.
- ANSI N45.2.9-1975, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants.
- Regulatory Guide 1.88, Rev. 2, Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records.
- ANSI 18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants.
- ANSI N45.2-1977, Quality Assurance Program Requirements.

4.1 Program Review

The requirements and guidelines found in the reference documents of paragraph 4.0 are implemented by the licensee's Quality Assurance Program by utilizing Site Administrative procedures, Quality Assurance procedures, and Document Control procedures. The inspector reviewed the following procedures:

- QAP 17.10, Nuclear QA Records, Rev. 2, May 17, 1985
- AP 10.1, Management of Station Records, Rev. 2, April 29, 1986
- DCI 1, Station Incoming/Outgoing Correspondence Control Instrumentation, Rev. 2, April 25, 1985
- DCI 2, Central Files Internal Processing, Rev. 2, April 1, 1985



- DCI 2.1, Document Preparation Instruction, Rev. 2, April 12, 1985
- DCI 2.4, Document Indexing, Rev. 5, March 25, 1986
- DCI 5.0, Control and Disposition of Active Files, Rev. 2, November 14, 1985
- DCI 9.0, Control of Station Archives, Rev. 2, November 8, 1985
- DCI 13.0, Methods for Correcting, Changing, Supplementing or Superseding Permanent Plant File Records, Rev. 0, March 4, 1986
- DCI 14.0, Final Disposition of Site Records, Rev. 0, March 4, 1986
- NMP2 Project Manual, Volume II, Section 3.8.1, NMP2 Records Management Plan, June 28, 1985

The above procedures were reviewed to verify compliance with the requirements and guidelines of the referenced documents in paragraph 4.0 and to assure that the licensee's procedures adequately established the following:

- Requirements to maintain and retain records required by the licensee's quality assurance program;
- Responsibilities to identify and maintain QA records;
- Responsibilities to transfer and retain construction and pre-operational phase records;
- Record storage controls to identify record storage facility, designate custodian(s) in charge of storage facilities, file and retrieve records, verify that the records received are in agreement with pre-established checklists or transmittal documents, control access to the files, maintain traceability when files are removed from storage, correct files and dispose superseded records; and
- Authorities and responsibilities are specified for authorizing the disposal of records no longer required to be maintained.

4.2 Implementation

The inspector selected a random sample of construction project records to determine their retrievability. The records consisted of SORC meeting minutes, personnel qualifications, procurement documentation and calibration records. The inspector verified that the records sampled were processed according to procedures, listed on the master computer index, properly stored and readily retrievable.

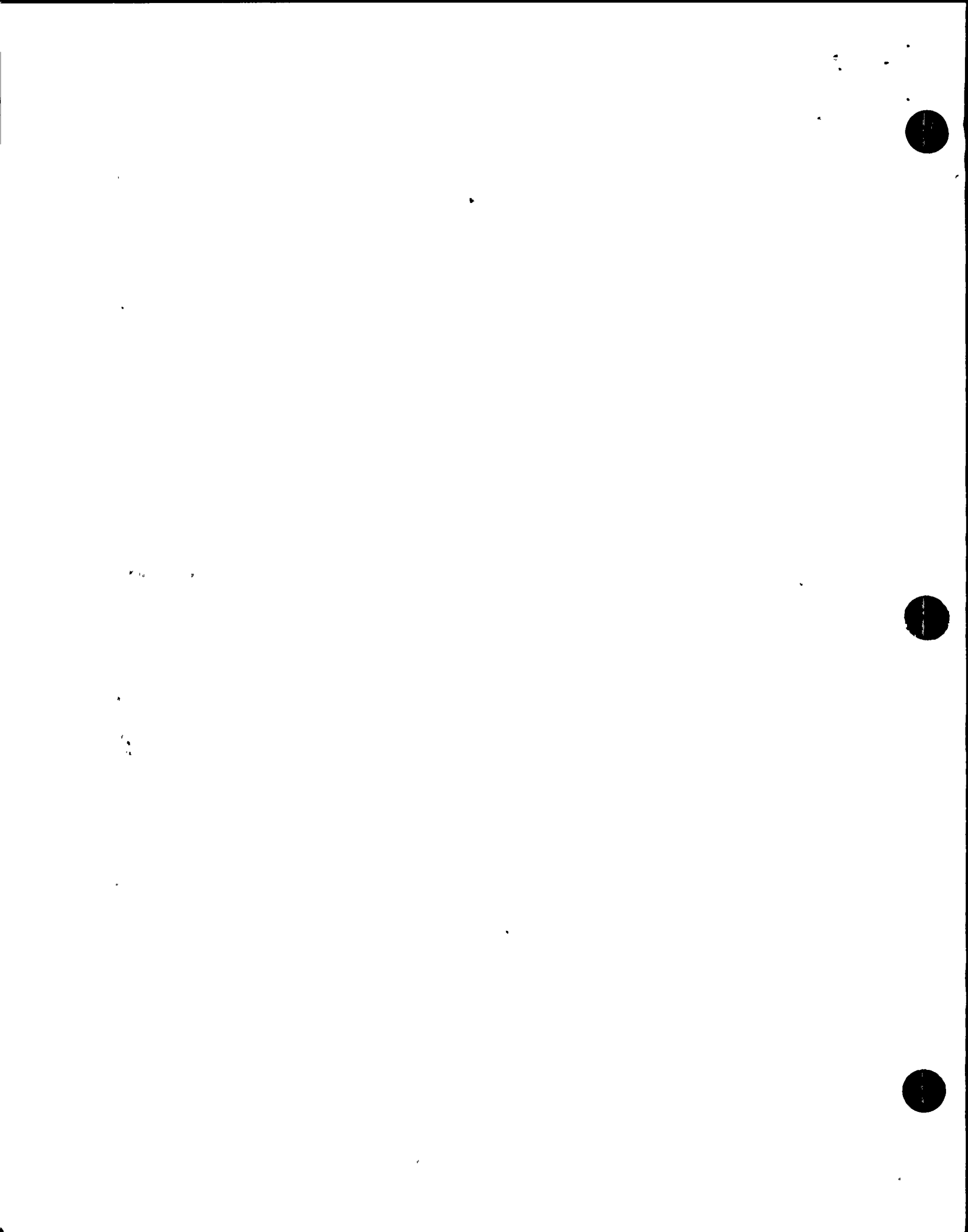
The effectiveness of the implementation of the licensee's records management program during the operational phase of Unit 2 will be reviewed in a future NRC inspection.



4.3 Findings

Based on the above review and discussions with cognizant personnel, the inspector determined the following:

- Site Administrative procedure AP 10.1, "Management of Station Records" and supplemental document control procedures outline the responsibilities and provisions for the access control, collection, disposition, removal, retention, retrieval, storage and maintenance of site records and technical information. The procedures are in effect for Unit 1 and apply to Unit 2 records generated by the Nuclear Generation Department for equipment that has been turned over to NMPC for operations and/or maintenance.
- Permanent Plant File records generated from the construction project are processed in accordance with project records management procedures. The licensee will continue to process construction project related records under the current system until all such records are processed. Any records generated from work performed on systems turned over to operations but completed by project personnel will also be processed in accordance with the project records management procedures.
- Although construction project and operations records are processed in accordance with different procedures they are both entered into a similar computer aided document retrieval index system intended for general use by station personnel.
- The Records Management organization is currently conducting classes to train operation and construction personnel in the use of the records management retrieval system. The responsibility of determining who receives the training is up to the various station supervisors. The Records Management personnel are responsible for maintaining attendance records of the training. The inspector obtained a training manual and reviewed a sample of the training given to licensee personnel. The training provided adequate guidance to personnel in the use of the computer aided record retrieval system.
- Through discussions with the Superintendent of Records Management and a review of the current staffing, the inspector determined that the licensee is adequately staffed to manage the present records workload. The Records Management Superintendent has temporarily hired eight employees to help process the increased records workload due to the Unit 1 outage. There are also provisions to hire six more employees as Unit 2 nears commercial operation.



- The licensee is currently incorporating some attributes of the construction Records Management Instructions (RMIs) with the operations Document Control Instructions (DCIs) and generating Nuclear Records Management Instructions (NRMIs) for the station operations records management program covering units 1 and 2. The NRMIs will be reviewed in a subsequent inspection.

The attributes of the records management program reviewed were adequate. No violations were identified. From this review the inspector concluded that the licensee's records management program is adequate to support Unit 2 operation.

5.0 Document Control Program

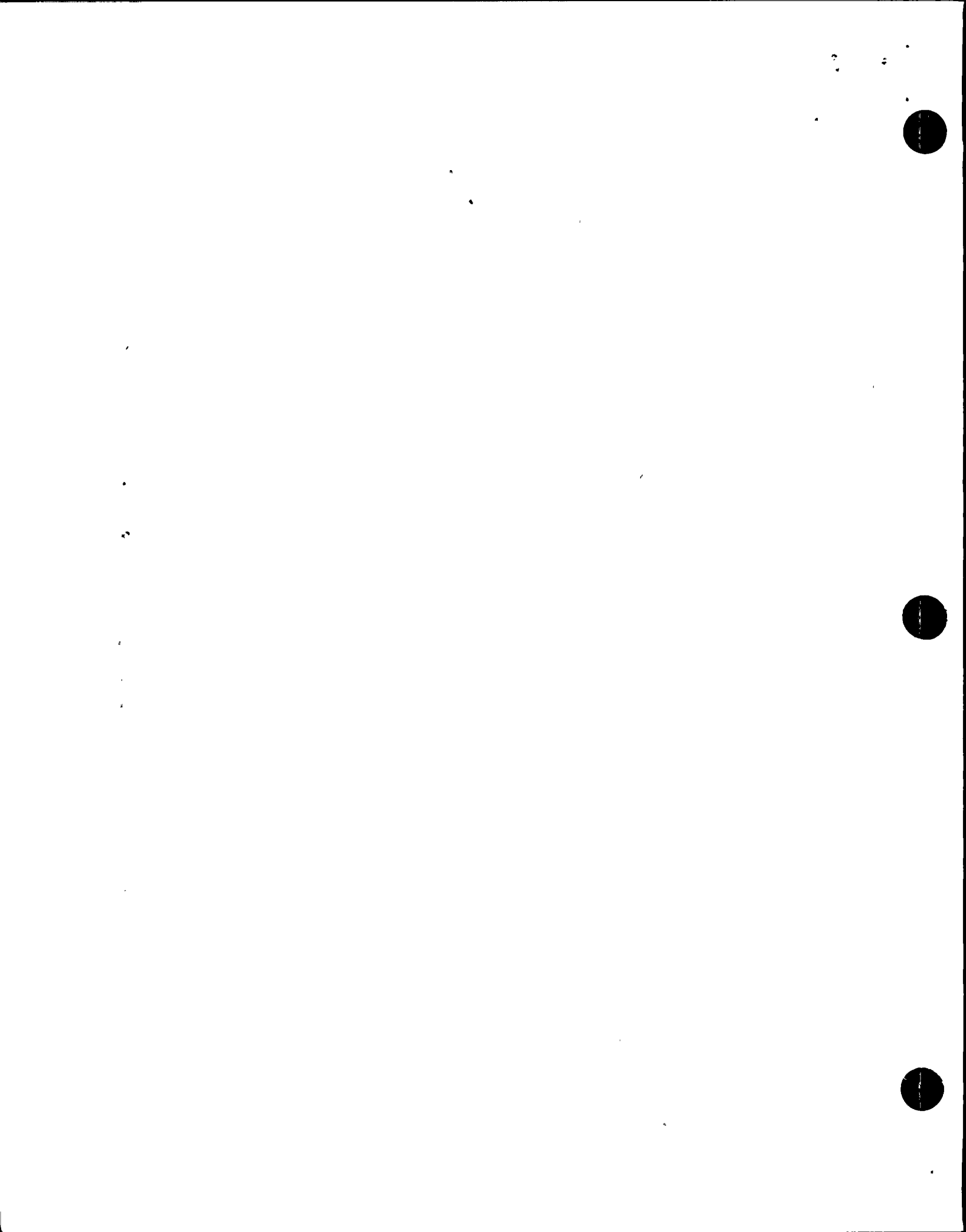
The basic guidelines and requirements of a document control program are contained in:

- 10 CFR 50, App. B, Criteria II, V, VI
- Proposed Tech Specs, Section 6, Administrative Control
- Final Safety Analysis Report (FSAR) 17.1.6
- ANSI N45.2 - 1977, Quality Assurance Program Requirements
- ANSI N18.7 - 1976, Administrative Controls and Operational Quality Assurance for the Operational Phase of Nuclear Power Plants
- Regulatory Guide 1.33, Rev. 2, Quality Assurance Program Requirements (Operation)

5.1 Program Review

The requirements and guidelines established in the reference documents in paragraph 5.0 are implemented by the licensee's Quality Assurance Program by utilizing Quality Assurance Procedures, Site Administrative Procedures, Nuclear Engineering Procedures and Nuclear Engineering and Licensing procedures. The inspector reviewed the following procedures:

- QAP-6.01, Review and Control of NMPC QA Documents, Rev. 3, February 19, 1986
- AP-6.0, Procedure for Modification and Addition, Rev. 1, April 1, 1986
- NEL-014, Document Control and Distribution, Rev. 0, August 25, 1985
- ND-014.C, Controls and Distribution of Drawings, Rev. 0, August 22, 1985
- ND-160, Drawing Change Control, Rev. 0, August 29, 1985
- ND-160.B, NMP2 Drawing Revision and Issuance, Rev. 0, February 11, 1986



- DCI-11, Control and Distribution of Technical Specifications, Rev. 1, September 19, 1985
- CSI 11.13, Controlled Document Processing, Rev. 10, March 27, 1986

The above procedures for document control were reviewed to verify that the program is consistent with the requirements and guidelines of the referenced documents in paragraph 5.0 and to assure that the program contains the following attributes:

- Require that current as-built drawings, including piping and instrument drawings (P&ID's), will be provided to the plant site in a timely manner;
- Require that proposed drawing changes and the revised drawings receive the same level of management review as originals;
- Provide provisions for identifying and marking drawings with outstanding revisions;
- Establish control of obsolete drawings;
- Require that discrepancies found between as-built drawings and the as constructed facility are handled as design changes;
- Require master indices to be maintained for drawings, manuals, technical specifications and, procedures that indicate the latest revision; and
- Provide a mechanism for document issuance, distribution, use and periodic review.

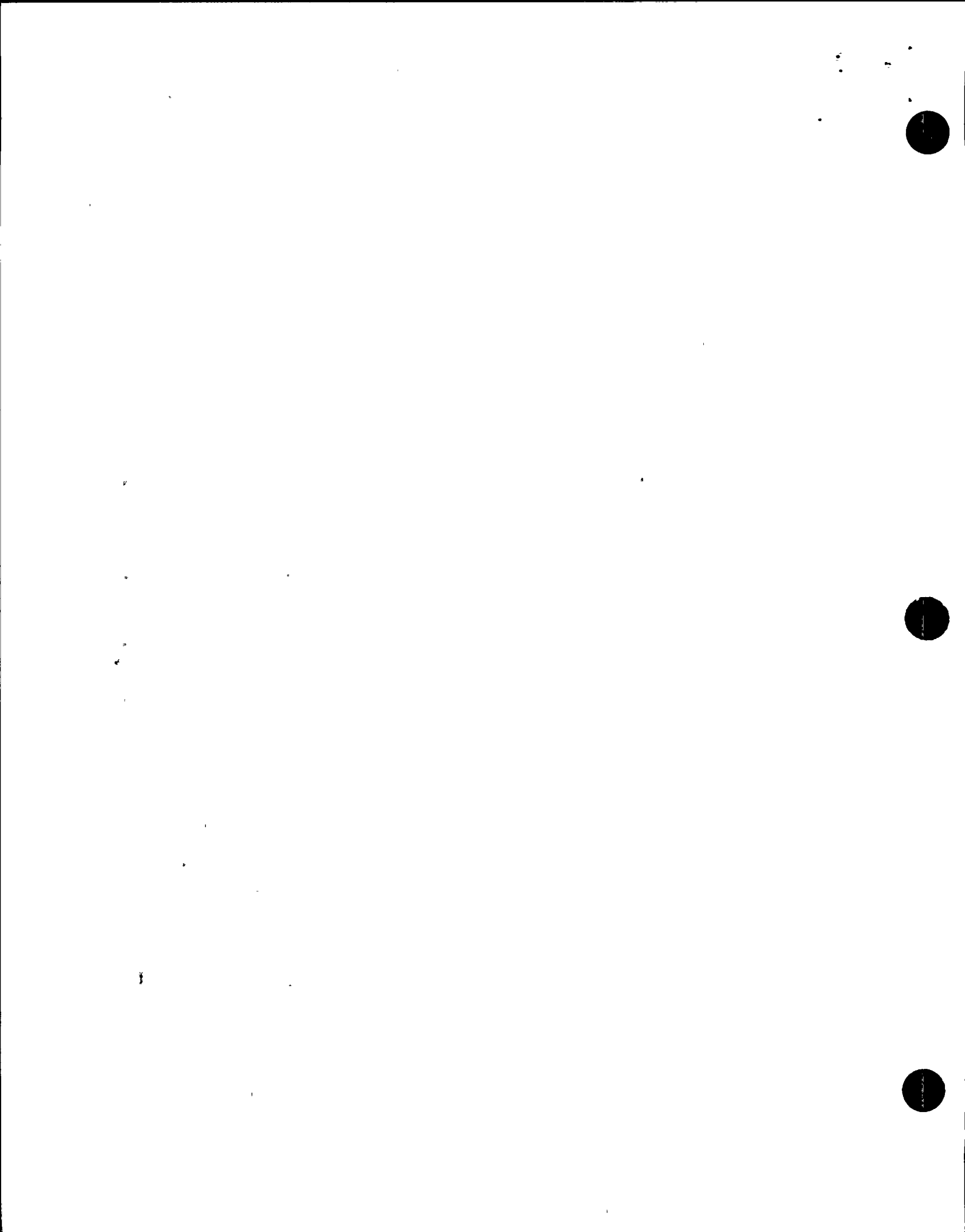
5.2 Implementation

The responsibilities for controlled documents at the site are presently delineated in project guidelines and instructions for the Project Document Control Organization. The verification of the operational phase document control program implementation will be performed in a subsequent inspection.

5.3 Findings

Based on the above review and discussions with cognizant personnel, the inspector determined the following:

- Responsibilities and administrative controls have been established to describe methods by which the Nuclear Engineering and



Licensing Department will control and distribute documents and their revisions. Documents generated by the Nuclear Engineering and Licensing Department and those received from other groups are controlled through implementation of applicable procedures. Nuclear Engineering and Licensing is responsible for providing controlled documents to the site for distribution. The attributes of the document control program reviewed were adequate.

- The responsibilities for controlled document distribution on site are presently delineated to the Project Document Control Organization through certain procedures. A computer index is maintained of the latest revisions or changes to controlled documents and utilized to ensure effective distribution and tracking of controlled copies.
- Prior to commercial operations, the licensee plans to transfer the responsibilities of the Project Document Control Organization from construction to operations. However, the licensee has not yet developed the required operations procedure or instruction to delineate the methods and responsibilities for receiving and processing controlled documents, ensuring that the latest applicable controlled documents are distributed to identified controlled copy stations or holders, and preventing the use of voided, superseded or cancelled documents. The licensee's representatives stated that the required procedure would be developed and implemented to establish an adequate document control program for the operation phase of Unit 2. This item remains unresolved (50-410/86-22-01) pending licensee development and implementation of the required procedure or instruction to provide adequate control for the operational phase document control program.

No violations were identified.

6.0 Unresolved Items

Unresolved items are matters which require additional information in order to determine if they are acceptable, violations or deviations. The unresolved items identified during this inspection are discussed in Paragraph 5.3 of this report.

7.0 Exit Interview

A mini-exit meeting May 7, 1986 and a final management meeting May 9, 1986 were held to discuss the scope and findings of the inspection as detailed in this report (see Paragraph 1.0 for attendees). The licensee did not indicate that any proprietary material was contained within the scope of this inspection.

At no time during this inspection was written material provided to the licensee.

