NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

July 21, 1986
(NMP2L 0791)

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:

Please find attached our formal response to the Notice of Violation dated June 19, 1986, accompanying Inspection Report No. 50-410/86-13.

Very truly yours,

C. V. Mangan
Senior Vice President

CVM/TL/cla
(0449C)

Attachment

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

W. A. Cook, NRC Senior Resident Inspector
NMPC Project File

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7pp.

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT - UNIT 2
DOCKET NO. 50-410

Response to Notice of Violation

Violation 1 (86-13-01)

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.

   Response

   Rigging from permanent plant pipe and pipe supports is prohibited by site procedure CSI 20.16. The site program contains training courses in the protection of permanent plant equipment and craft awareness. These courses cover the topic of rigging and stress that rigging from permanent plant equipment (which includes pipe and pipe supports) is prohibited. It is believed that this practice is not common and that these were isolated instances.

Corrective Actions

The two instances of improper rigging were corrected. ND 16216 was initiated to evaluate the line close to support BZ-71XW. No evaluation of the scaffolding handrail was performed because it was judged that no damage could be done to hanger BZ-71BW-1 by the light weight handrail.

Preventive Action

Piping/Mechanical Department Supervisors were reminded that proper work practices are to be utilized by personnel under their supervision. Further, site personnel were strongly reminded to conform to site procedure CSI 20.16 in work practices. Specification NMP2-P301P, the piping specification, was revised to specifically prohibit rigging from permanent plant piping (unless previously approved by Engineering).

Violation 2 (86-13-03)

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

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 measurable gap in the lateral direction, and support 11A had no measurable gap in the vertical direction.

Response

Between February and April, 1986, Stone and Webster Quality Assurance performed a surveillance verification of RCI as-built drawings as required per Stone and Webster's ASME III Program. A sample re-verification of a complete section of one quadrant of the Reactor Building, including the Primary Containment, was performed to assure that the surveillance was representative of all Reactor Controls as-built activities. This surveillance re-verification was later augmented by additional verification in portions of other quadrants including portions in the secondary. The Control Rod Drive insert and withdrawal lines, multi-function supports and the 8-inch scram headers and supports were included.

A total of 5943 as-built attributes were verified by Stone and Webster Quality Assurance. Thirty-six (36) specific discrepancies, plus two (2) generic discrepancies were identified. The discrepancies, grouped by attribute, are listed below.

ATTRIBUTE	NUMBER OF DISCREPANCIES
Spacing dimension between pipes	18
Spacing dimension between HCUs	1
Spacing between CRD frame members	6
Clearance	3
Gap requirements	3
Member location	1
Need for shim to be identified on the as-builts	2
Bolting installation requirements	2
TOTAL	36 (36/5943=0.6%)

The two generic discrepancies were for non-incorporation of generic change documents, one accepting zero (0) gap on insert/withdrawal line type AC clamps and one accepting previously identified slope deviations on insert/withdrawal lines, into as-built drawings.

A sample for the surveillance verification was selected to identify one area (i.e., one quadrant of the CRD system) which was representative of all the as-built activities performed on the system by RCI and verify a large number of attributes in that area. Since this overview was designed to provide assurance of the as-built process, and not to provide acceptance of a specific activity or attribute, each attribute was considered equal. The results of the verification were provided to Engineering for an evaluation of all of the discrepant attributes to determine whether additional verification should be performed for a specific activity or attribute. Engineering subsequently dispositioned all of the identified discrepancies and determined that no additional verifications were required.

The actual sample size of 5943 was used for the surveillance verification. Since the sample taken in one quadrant was very large and has been determined to be representative of all as-built activities, a statistical extrapolation of the sample results to all other quadrants can be made. Analysis provides 99% confidence that the number of discrepant items in the un-verified balance is less than 1%.

All hardware discrepancies identified on Stone and Webster Inspection Report QP6S0073 were dispositioned to be acceptable as-is. EDCR C94199 incorporated these discrepancies into Reactor Controls as built drawings. Stone and Webster Type "C" Inspection Report QP6S0123 documented 5 discrepancies. Four were dispositioned "accept-as-is" and one was reworked. This re-evaluation of the Reactor Controls as-built program has determined that no additional action is required.

Corrective Action

Following the inspection exit meeting on April 25, 1986, a 100% verification of the Scram Discharge Header Support Gaps was performed by Stone and Webster's Field Quality Control/Engineering. A total of 33 supports were evaluated and 3 were found to have near "zero" gaps. The measurements for these cases are summarized below:

Support	Req'd. Gap (in.)	Measured Gap (in.) SWEC QA	NRC	Remarks
1A	.063	.016	.000	Debris cleaned out
11A	.031	.000	.000	- -
18B	.031	.000	- -	NRC did not inspect

N&D 16,299 was initiated on 4/29/86 and dispositioned on 5/1/86 to rework the 3 gaps. The rework has been accomplished and documented under Section XI of the ASME code. This work was completed on 7/9/86.

Preventative Action

No preventative actions are needed. Reactor Controls has completed all required work at Unit 2 and has demobilized.

Violation 3A (86-13-07)

10 CFR 50, Appendix B, Criterion V 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 Kellems 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 Kellems grips.

Response

Kellems grips are required by specification E061A for Category I cables in vertical risers exceeding 25 feet in length. EDCR C02532 was issued to identify all the locations where Kellems grips were to be installed. At the time the EDCR was issued, it was believed the cable tray installations were complete. Subsequent to issuance of the EDCR, cable trays 2TK522G and 2TD567G were added and the Kellems grips were inadvertently omitted. This is considered an isolated instance.

Corrective Action

The subsequent drawing revision and listings of Kellems grips locations have been reviewed for addition of other cable trays and/or increased lengths of cable. Kellems grips have been installed on the two cable trays identified during the inspection. Full compliance has been achieved. The NRC inspector reviewed these corrective actions during inspection 86-28.

Preventive Action

Since these are isolated instances and all Kellems grips have been installed, no preventive action is needed.

Violation 3B (86-13-05)

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.

Response

The duct was identified by affixed tags on the floor and the walls. It is believed that the tag on the flexible conduit was either overlooked or had been inadvertently removed during testing.

Corrective Action

The identified deficiency has been corrected. The NRC inspector reviewed the corrective action taken during inspection 86-28.

Stone and Webster Field Quality Control performed a review of other areas for the same condition. The review identified similar conditions in the Diesel Generator Bay areas. Corrective action similar to the above was taken and documented in Inspection Report E6A52874.

Preventive Action

The Inspection Supervisor has reiterated to inspection personnel the requirements to mark the flexible conduit when it is part of the ductline extension.

Violation 3C (86-13-08)

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.

Response

The instrument impulse lines in question were not identified inside primary containment where the lines passed through the penetration. The lines were identified outside the primary containment within six (6) feet of the containment penetration.

Corrective Action

Specification C081A has been revised per EDCR F13539A to clarify that impulse lines may be tagged immediately after the excess flow check valve on the secondary containment side of the drywell wall in the Reactor Building approximately six (6) feet from the containment penetration. Further, the specification has been clarified so that lines passing through the biological shield wall need be tagged only outside the wall and lines underneath the suppression pool water level need not be tagged. The EDCR was closed 6/30/86. Full compliance has been achieved.

Preventive Action

No preventive action is needed. The instrument lines are tagged according to the revised specification requirements.

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Corrective Action

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Preventive Action

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Violation 3B (86-13-05)

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

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Response

The duct was identified by affixed tags on the floor and the walls. It is believed that the tag on the flexible conduit was either overlooked or had been inadvertently removed during testing.

Corrective Action

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Preventive Action

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Violation 3C (86-13-08)

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.

Response

The instrument impulse lines in question were not identified inside primary containment where the lines passed through the penetration. The lines were identified outside the primary containment within six (6) feet of the containment penetration.

Corrective Action

Specification C081A has been revised per EDCR F13539A to clarify that impulse lines may be tagged immediately after the excess flow check valve on the secondary containment side of the drywell wall in the Reactor Building approximately six (6) feet from the containment penetration. Further, the specification has been clarified so that lines passing through the biological shield wall need be tagged only outside the wall and lines underneath the suppression pool water level need not be tagged. The EDCR was closed 6/30/86. Full compliance has been achieved.

Preventive Action

No preventive action is needed. The instrument lines are tagged according to the revised specification requirements.

RECEIVED-REGION 1
1986 JUL 25 PM 2:02

I urge the N.R.C. to force CP & L to conduct a Full Participation Emergency Exercise of the Replacement Plan before operation of Shearon Harris is authorized. CP&L professes such a great desire for safety, but there actions contradict what they tell the press and concerned citizens.- Please deny CP&Ls request (July 10, 1986) for an excemption. (concerning the drill, etc).

Sincerely,

Catherine Leigh Stanley

P.S. I think it's preposterous that CP & L can make glib assurances about safety and evacuation procedures when they dont even want to have an Exercise!!! And we're expected to believe that everything would run faultlessly in the event of an actual emergency ????