

NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

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JAMES A. PERRY
VICE PRESIDENT - QUALITY ASSURANCE

December 16, 1986

Mr. William F. Kane, Director
Division of Reactor Projects
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

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

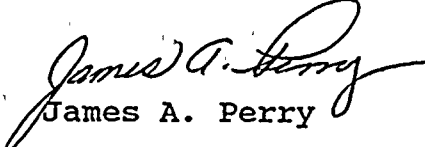
Dear Mr. Kane:

Your November 19, 1986 letter transmitted Inspection Report 86-52 and requested information for Nine Mile Point Unit No. 2.

The enclosed response addresses Inspection Report Section 1.0 entitled Inspection Conclusions.

Our responses identify actions taken or those that will be taken to address these matters. Further, we would be pleased to meet with you on this matter, if requested.

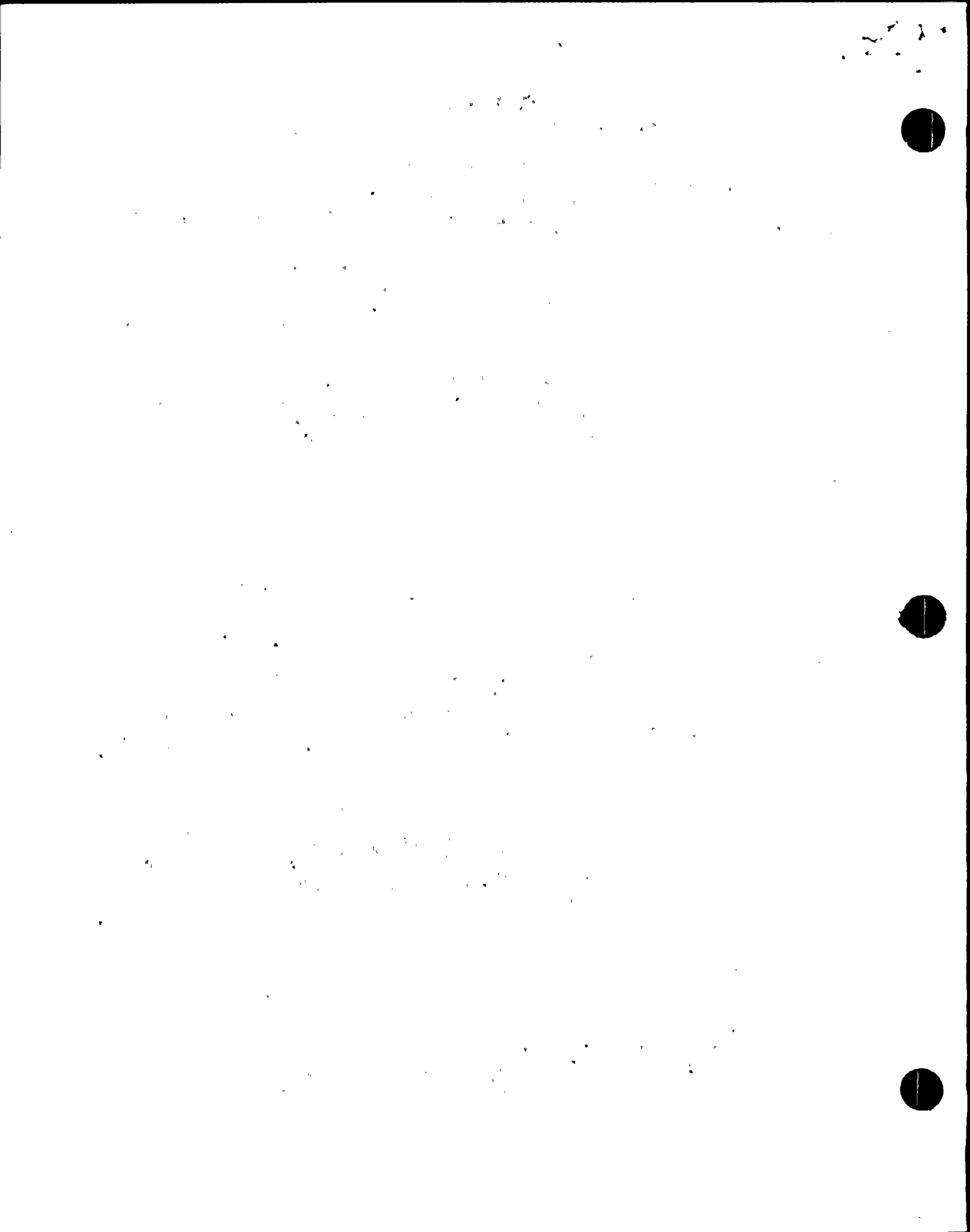
Sincerely,


James A. Perry

JAP/ams
Attachment

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ATTACHMENT

PARAGRAPH 1.1.(1)

QIP review of QA concerns lacked active independent management involvement similar to that normally provided by offsite review committees.

RESPONSE: Action has been take to provide for active independent management involvement of QA concerns. For example, in Mr. Donlon's letter to Mr. Kane of the NRC, dated September 1, 1986, he summarizes actions taken to inform the senior resident and senior management of specifics regarding concerns. The specific changes in practice have been subsequently reflected in Revision 3 to QAP 16.70 issued September 19, 1986. One of the additions made in that revision now requires that the chairman of the Safety Review and Audit Board receive weekly reports issued by Quality First. Current practices conform to the commitments made in this Quality First Procedure, 16.70.

PARAGRAPH 1.1.(2)

Bypassed QC hold points were not trended for frequency, repeat offenders, or repeat by discipline.

RESPONSE: When a QC hold point is found to have been bypassed, QA initiates prompt action to resolve the item with the responsible organization. In the future, for each instance where a QC hold point has been bypassed, QA will maintain a record of the occurrence and evaluate the listing to determine if there are any trends and whether additional action is warranted by the offending organization.

PARAGRAPH 1.1.(3)

QC hold points in maintenance procedures and related QC checklists were not consistent.

RESPONSE: QC checklists are currently being revised to be consistent with the referenced Maintenance Procedures regarding designated QC hold points. This effort is planned to be completed by January 2, 1987. In addition, as Maintenance Procedures are revised, Quality Engineering will review them for inspection points and will revise the corresponding inspection plans to be consistent with the revised Maintenance Procedures. On an interim basis, as work requests are processed, the Quality Engineering Organization reviews the referenced procedures and checklists for consistency.

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PARAGRAPH 1.2.(1)

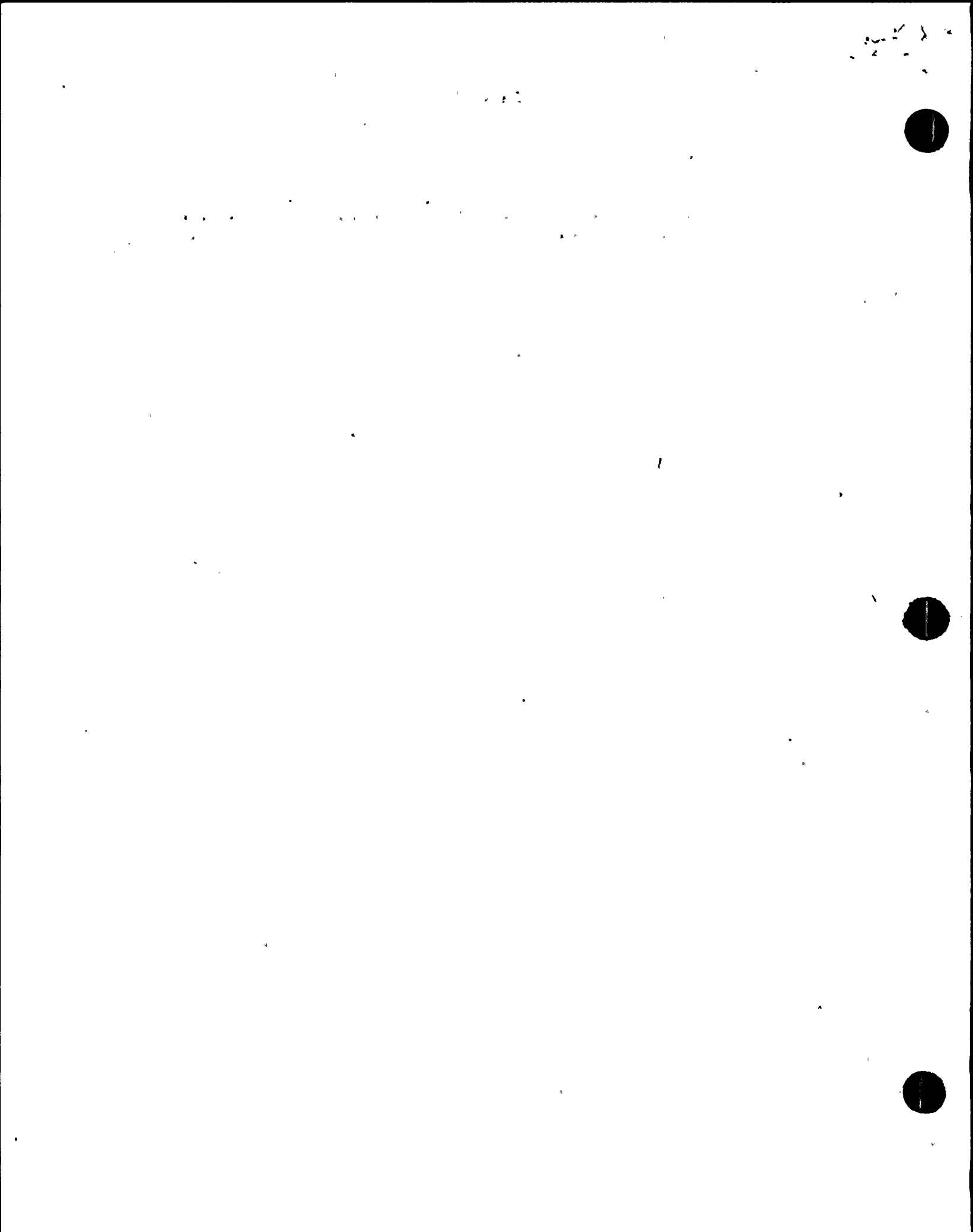
Limits on troubleshooting activities performed under Deficiency Reports (DRs) and Work Requests (WRs) are not well defined, and QA Engineering is not providing clearly established inspection attributes to QC inspectors.

RESPONSE: Controls on troubleshooting activities have been established in Administrative Procedure 3.3.2 Revision (2) approved 12/5/86. In order for Quality Engineering to provide clearly established inspection attributes to the QC inspector regarding work requests that involve troubleshooting matters, the following action is being taken: As Quality Engineering receives work requests for review and approval, and determines that the work in question involves troubleshooting, a "Notify QA Prior to Work" memorandum is attached to the individual work request. The Quality Engineer is then responsible for following up on the work request during the troubleshooting process and evaluating the kind and extent of inspection that may be required. When this is determined, the Quality Engineer provides specific direction to the inspector on the inspection checklist. The inspector then performs inspections in accordance with the checklist.

PARAGRAPH 1.2.(2)

While QA department personnel have been adequately trained on QA procedures, there has been no formal training on implementing policy guidance disseminated by numerous memoranda. In addition, there is no vehicle in use for continuing training of new contractor personnel or on new policy guidance.

RESPONSE: The series of meetings that have been held with Quality Assurance personnel at Unit 2 in response to the commitments made as part of Q1P Concern 64C have included discussions of these areas. In addition, this type of information along with other material of a general QA nature involving policy and philosophy and material currently in memorandums is in the process of being finalized for formal presentation to all QA personnel. The session will be identified as QA indoctrination. It will provide a broad overview of policy and philosophy matters that is intended to put into perspective, information beyond the procedures training that QA personnel normally receive. It is planned that this material will be presented using specific viewgraphs. Handout information will also be provided to the attendees for their subsequent review



PARAGRAPH 1.2.(2)

RESPONSE (cont'd.)

and reference. The initial session is expected to take place in the first quarter of 1987. This standardized indoctrination is intended to be conducted at intervals to accommodate new employees.

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