

December 16, 1986
(NMP2L 0960)

Mr. W. Kane, 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. Kane:

Please find attached our formal response to the Notice of Violation dated October 23, 1986, accompanying Inspection Report No. 50-410/86-37.

Very truly yours,

C. V. Mangan
C. V. Mangan
Senior Vice President

CVM/AZP/cia
(1939H)

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

W. Cook, NRC Resident Inspector
NMPC Project File

8610310024

~~8612290291~~

4pp.



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

Response To Notice of Violation

Violation (86-37-01)

10 CFR 50, Appendix B, Criterion V, requires that "Activities effecting quality shall be prescribed by documented instructions, procedures and shall be accomplished in accordance with these instructions, procedures ..."

Nine Mile Point Unit 2, procedure N2-IMP-EQM-005, Rev. 0, "Environmental Qualification Requirements for Maintenance and Replacement of Rosemount Transmitters" requires that Rosemount transmitter covers be torque tightened to assure adequate environmental seal and proper operation in a harsh environment.

Contrary to the above, the licensee failed to follow this procedure in that on August 14, 1986 two safety related Rosemount transmitters, 2RHS*PT114 and CSH*PT105 included in the above procedure, were identified with loose covers. Further, procedures were not provided which specified guidance for restoring Rosemount transmitters to qualified status in that Deficiency Report #17783 does not provide instructions to replace ethylene propylene O-rings, use Dow Corning 55MM grease nor give torque requirements.

1. Response

During the plant tour, the inspector identified a significant number of Rosemount Transmitters with loose side covers. The explanation provided the inspector was that the final sealing and torquing of the side covers would be deferred until final completion of the start-up activities, and that those covers were being tracked on numerous deficiency reports. The inspector randomly selected six transmitters and found that two transmitters, 2RHS*PT114 and 2CSH*PT105, were not addressed on a Deficiency Report provided to him.

A thorough review of all DRs that were generated to track "O"-ring replacement and torquing of the transmitter side covers was performed. This review indicated that DR #18405 dated 4/16/86 also was issued to track the work on one of the identified transmitters 2CSH*PT105. Final work completion on the transmitter was performed on 8/19/86 and closed after satisfactory QA review on 8/21/86. This report was inadvertently omitted from the documents provided the inspector.



Vendor manual reference did not have

- 2 - Revision No:
CONTROL NO:

OR DATE.

The other identified transmitter, 2RHS*PT114, was not tracked on a Deficiency Report because it was classified as a non-safety related electrical function in a passive application and the O-ring on the transmitter cover does not perform a safety related function.

The Notice of Violation also includes a concern that procedures were not provided to restore the transmitters to their original qualified status. Nine Mile Point Unit 2, Startup Administration Program specifically allows the use of approved procedures, drawings, specifications and vendor manuals to accomplish the requirements of 10CFR50 Appendix B Criterion V. Deficiency Report #17783 utilized the Rosemount vendor manual in block 9, as the referenced/related document. The requirements specified in the vendor manual were implemented on Quality Control Inspection Report #2-86-3900 and found to be acceptable.

2. Additional Information

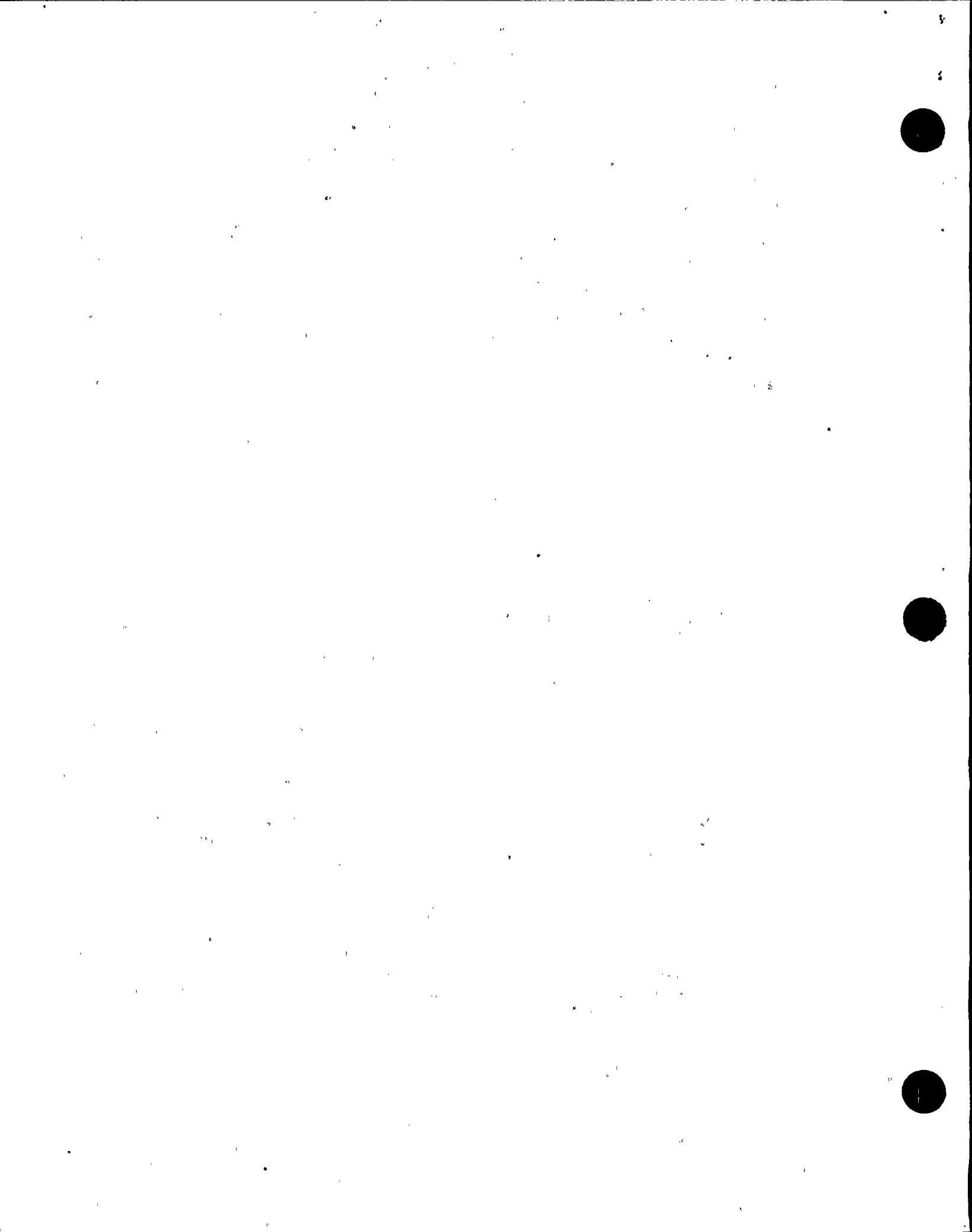
Subsequent to discussions with the staff, Region I had the following queries raised during a conference telephone call conducted on December 5, 1986.

QUESTION: Were all environmentally qualified Rosemount transmitters addressed on Deficiency Reports?

RESPONSE: A thorough review of all environmentally qualified Rosemount transmitters was performed to check if transmitters were tracked on Deficiency Reports. Additionally, when installation and inspection was complete, a mating of Deficiency Reports with Inspection Reports was performed by our Start-up and Test Organization. Subsequent to the inspection, four additional EQ transmitters were added to the EQ List. Work on these was completed utilizing operations procedure N2-IMP-EQM-005.

QUESTION: Were the EQ installations complete at the time of the NRC inspection?

RESPONSE: Our records indicate that a small number of the transmitter installations were complete at the time of the inspection. Considerable work and inspections remained to be performed on these units during the time of the NRC inspection. Most Deficiency Reports remained open until all internal work and inspections were complete. It was considered inefficient to replace the "O" rings and torque the covers each and every time work was performed. Therefore, the side covers were normally replaced loosely after each work assignment. When all internal work was completed, new "O" rings and Dow Corning 55mm grease were applied and the covers were torqued to the specified requirements on the qualified transmitters. Quality Control subsequently inspected the completed installation.



QUESTION: The inspector identified transmitters that did not have DRs written. Has the Project reviewed their tracking system and can the Commission be assured that no other transmitters have been missed?

RESPONSE: Niagara Mohawk reviewed the Master Tracking System at the time the inspector raised this concern. The only transmitter without a DR that was identified by the inspector was one that did not require a DR. It was classified as a non-safety related electrical function. In the case of the other identified transmitter, Niagara Mohawk did not immediately identify the proper DR, although a DR did exist for this transmitter. Niagara Mohawk's review of this concern did not identify any qualified transmitter without a required DR. *Project 15*

QUESTION: Can the Commission be assured that the environmental qualifications are maintained and is the problem corrected?

RESPONSE: Operating Procedure N2-IMP-EQM-005 is in place to maintain the environmental qualification of Rosemount transmitters. Additionally, there is an Equipment Qualification Maintenance Program Data Sheet for each Rosemount transmitter. Niagara Mohawk is confident that these measures will assure that the environmental qualification of the Rosemount transmitters will be maintained.

Niagara Mohawk addressed the Nuclear Regulatory Commission staff request for status of the Equipment Qualification program at Nine Mile Point Unit 2 in letter NMP2L 0822 dated August 18, 1986. In that letter it was stated that installation of EQ components are administratively controlled by the Master Tracking System. The Master Tracking System will be used to assure that components are returned to service.

After completing all reviews of the EQ List, the Operating Procedure, the EQ Maintenance Sheets, the Master Tracking System, and Quality Control Inspection Reports, we are satisfied that the Environmentally Qualified Rosemount transmitters have been returned to original qualified status.



NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/301 PLAINFIELD ROAD, SYRACUSE, N.Y. 13212/TELEPHONE (315) 474-1511

December 16, 1986
(NMP2L 0960)

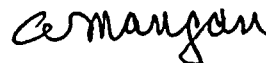
Mr. W. Kane, Director
U.S. Nuclear Regulatory Commission
Region I
Division of Reactor Projects
631 Park Avenue
King of Prussia, PA 19406

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

Dear Mr. Kane:

Please find attached our formal response to the Notice of Violation dated October 23, 1986, accompanying Inspection Report No. 50-410/86-37.

Very truly yours,



C. V. Mangan
Senior Vice President

CVM/AZP/cia
(1939H)

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

W. Cook, NRC Resident Inspector
NMPC Project File

8612290291 861216
PDR ADCK 05000410
Q PDR

11
1501



Faint, illegible text centered on the page, possibly bleed-through from the reverse side.



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

Response To Notice of Violation

Violation (86-37-01)

10 CFR 50, Appendix B, Criterion V, requires that "Activities effecting quality shall be prescribed by documented instructions, procedures and shall be accomplished in accordance with these instructions, procedures ..."

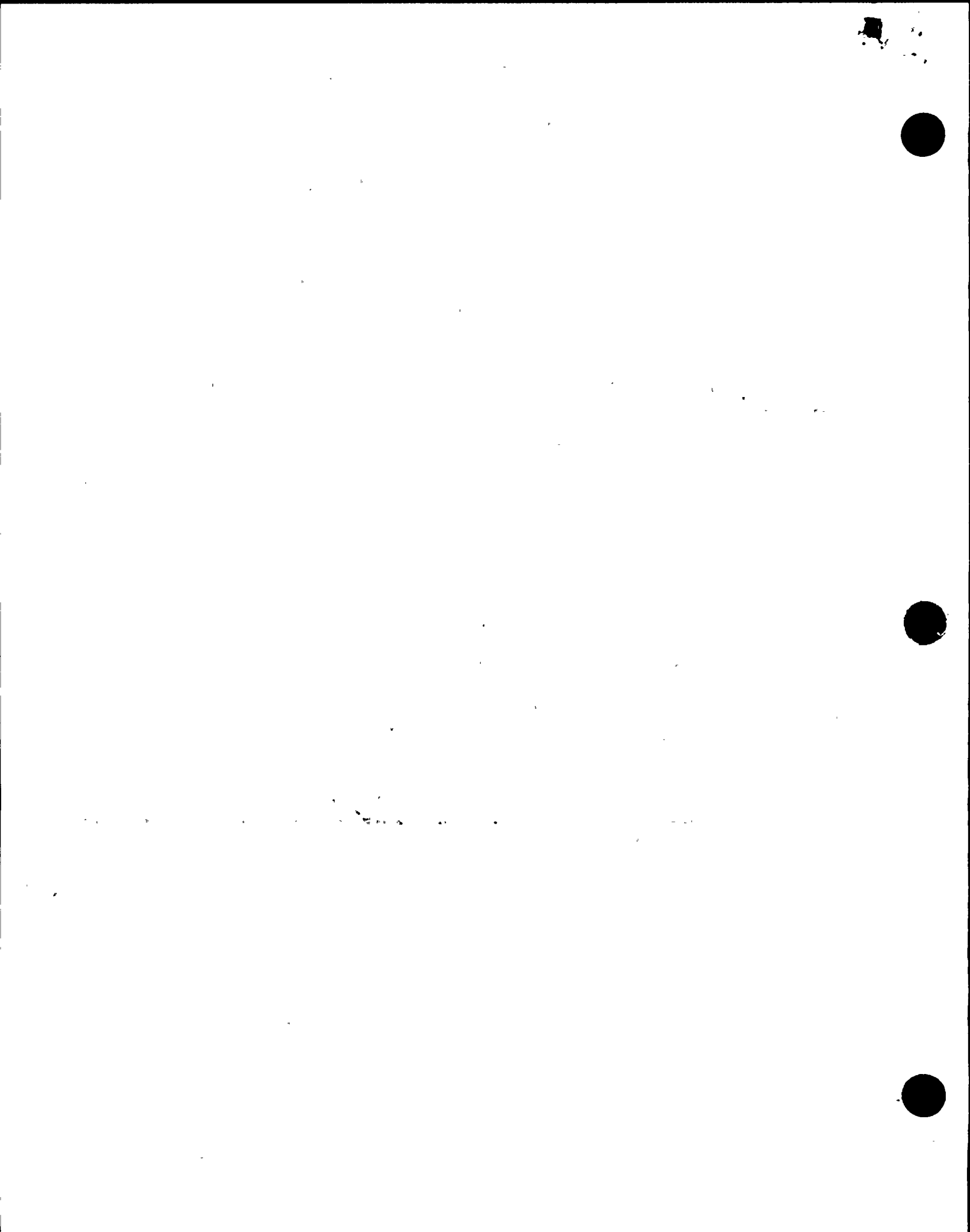
Nine Mile Point Unit 2, procedure N2-IMP-EQM-0005, Rev. 0, "Environmental Qualification Requirements for Maintenance and Replacement of Rosemount Transmitters" requires that Rosemount transmitter covers be torque tightened to assure adequate environmental seal and proper operation in a harsh environment.

Contrary to the above, the licensee failed to follow this procedure in that on August 14, 1986 two safety related Rosemount transmitters, 2RHS*PT114 and CSH*PT105 included in the above procedure, were identified with loose covers. Further, procedures were not provided which specified guidance for restoring Rosemount transmitters to qualified status in that Deficiency Report #17783 does not provide instructions to replace ethylene propylene O-rings, use Dow Corning 55MM grease nor give torque requirements.

1. Response

During the plant tour, the inspector identified a significant number of Rosemount Transmitters with loose side covers. The explanation provided the inspector was that the final sealing and torquing of the side covers would be deferred until final completion of the start-up activities, and that those covers were being tracked on numerous deficiency reports. The inspector randomly selected six transmitters and found that two transmitters, 2RHS*PT114 and 2CSH*PT105, were not addressed on a Deficiency Report provided to him.

A thorough review of all DRs that were generated to track "O"-ring replacement and torquing of the transmitter side covers was performed. This review indicated that DR #18405 dated 4/16/86 also was issued to track the work on one of the identified transmitters 2CSH*PT105. Final work completion on the transmitter was performed on 8/19/86 and closed after satisfactory QA review on 8/21/86. This report was inadvertently omitted from the documents provided the inspector.



The other identified transmitter, 2RHS*PT114, was not tracked on a Deficiency Report because it was classified as a non-safety related electrical function in a passive application and the O-ring on the transmitter cover does not perform a safety related function.

The Notice of Violation also includes a concern that procedures were not provided to restore the transmitters to their original qualified status. Nine Mile Point Unit 2, Startup Administration Program specifically allows the use of approved procedures, drawings, specifications and vendor manuals to accomplish the requirements of 10CFR50 Appendix B Criterion V. Deficiency Report #17783 utilized the Rosemount vendor manual in block 9, as the referenced/related document. The requirements specified in the vendor manual were implemented on Quality Control Inspection Report #2-86-3900 and found to be acceptable.

2. Additional Information

Subsequent to discussions with the staff, Region I had the following queries raised during a conference telephone call conducted on December 5, 1986.

QUESTION: Were all environmentally qualified Rosemount transmitters addressed on Deficiency Reports?

RESPONSE: A thorough review of all environmentally qualified Rosemount transmitters was performed to check if transmitters were tracked on Deficiency Reports. Additionally, when installation and inspection was complete, a mating of Deficiency Reports with Inspection Reports was performed by our Start-up and Test Organization. Subsequent to the inspection, four additional EQ transmitters were added to the EQ List. Work on these was completed utilizing operations procedure N2-IMP-EQM-@005.

QUESTION: Were the EQ installations complete at the time of the NRC inspection?

RESPONSE: Our records indicate that a small number of the transmitter installations were complete at the time of the inspection. Considerable work and inspections remained to be performed on these units during the time of the NRC inspection. Most Deficiency Reports remained open until all internal work and inspections were complete. It was considered inefficient to replace the "O" rings and torque the covers each and every time work was performed. Therefore, the side covers were normally replaced loosely after each work assignment. When all internal work was completed, new "O" rings and Dow Corning 55mm grease were applied and the covers were torqued to the specified requirements on the qualified transmitters. Quality Control subsequently inspected the completed installation.



QUESTION: The inspector identified transmitters that did not have DRs written. Has the Project reviewed their tracking system and can the Commission be assured that no other transmitters have been missed?

RESPONSE: Niagara Mohawk reviewed the Master Tracking System at the time the inspector raised this concern. The only transmitter without a DR that was identified by the inspector was one that did not require a DR. It was classified as a non-safety related electrical function. In the case of the other identified transmitter, Niagara Mohawk did not immediately identify the proper DR, although a DR did exist for this transmitter. Niagara Mohawk's review of this concern did not identify any qualified transmitter without a required DR.

QUESTION: Can the Commission be assured that the environmental qualifications are maintained and is the problem corrected?

RESPONSE: Operating Procedure N2-IMP-EQM-@005 is in place to maintain the environmental qualification of Rosemount transmitters. Additionally, there is an Equipment Qualification Maintenance Program Data Sheet for each Rosemount transmitter. Niagara Mohawk is confident that these measures will assure that the environmental qualification of the Rosemount transmitters will be maintained.

Niagara Mohawk addressed the Nuclear Regulatory Commission staff request for status of the Equipment Qualification program at Nine Mile Point Unit 2 in letter NMP2L 0822 dated August 18, 1986. In that letter it was stated that installation of EQ components are administratively controlled by the Master Tracking System. The Master Tracking System will be used to assure that components are returned to service.

After completing all reviews of the EQ List, the Operating Procedure, the EQ Maintenance Sheets, the Master Tracking System, and Quality Control Inspection Reports, we are satisfied that the Environmentally Qualified Rosemount transmitters have been returned to original qualified status.

RECEIVED-REGION 1
1986 DEC 22 PM 1: 59