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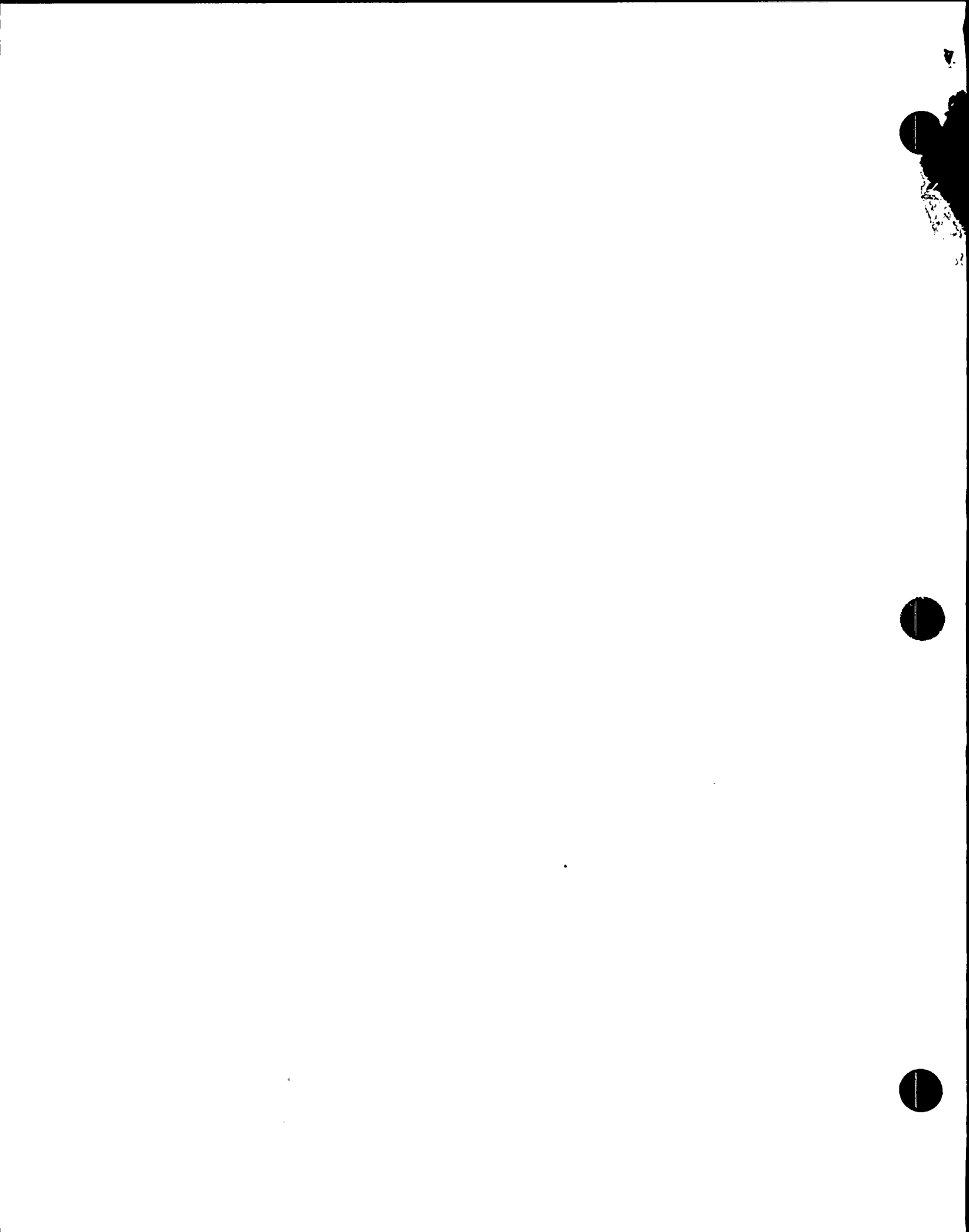
SUBJECT: Responds to violations noted in combined Insp Repts  
 50-220/87-11 & 50-410/87-25 on 870911 & unresolved Item  
 50-220/87-11-02. Revised QA program plans will be required  
 for future insps at site.

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October 12, 1987  
(NMPIL 0192)

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Re: Nine Mile Point Unit 1  
Docket No. 50-220  
DPR-63

Nine Mile Point Unit 2  
Docket No. 50-410  
NPF-69

Gentlemen:

Attached is Niagara Mohawk's response to the Notice of Violation contained in combined Inspection Report Nos. 50-220/87-11 and 50-410/87-25, dated September 11, 1987. Also included is our response to Inspector Unresolved Item 50-220/87-11-02.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



T. E. Lempges  
Vice President  
Nuclear Generation

TEL/AZP/jac  
0803G  
Attachments

cc: Regional Administrator, Region I  
Mr. W. A. Cook, Resident Inspector  
Mr. R. A. Capra, Project Director

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## VIOLATION A

10 CFR 50, Appendix B, Criterion IX, directs that nondestructive testing be accomplished in accordance with appropriate codes. Site Radiograph Procedure QAD 9.41, Rev. 0, invokes the ASME Code Section III, 1974 Edition, Summer 1975 Addenda.

Section III of the ASME Code, paragraph NC5320, directs that sections of welds that are shown by radiography to contain a zone of incomplete fusion be classified as unacceptable.

Contrary to the above, an NRC review of pipe weld radiographs during the period July 6-10, 1987, disclosed that inspected and accepted ASME Class 2 Weld No. X1-2MSS-POV7A-CDA-FW003 contained a rejectable zone of incomplete fusion, that was not recorded or dispositioned.

This is a Severity Level IV violation (Supplement II) and was identified at Unit 2, Docket No. 50-410.

## RESPONSE TO VIOLATION A

Niagara Mohawk admits the violation as stated. However, during baseline inspection the indication was identified and found to be acceptable by the Section XI flaw evaluation criteria.

The radiograph for Weld 2MSS\*AOV7A FW-003 was reviewed and accepted when three qualified radiographic examiners failed to identify the nonconforming condition. On April 20, 1987 a Stone & Webster Radiographic Interpretation Report was issued. The radiograph was performed and evaluated to Stone and Webster's Procedure QAD 9.41, Rev. 0. The radiograph was reviewed by Niagara Mohawk's Quality Assurance Level III examiner, Niagara Mohawk's Authorized Nuclear Inspector and Stone & Webster's Level III Non Destructive Engineering Chief. None of the above individuals identified the 0.750 inch zone of incomplete fusion. Subsequently, this indication was brought to Niagara Mohawk's attention by the Nuclear Regulatory Commission during the week of July 6, 1987.

## CORRECTIVE ACTION

Upon identification by the NRC Inspector, a Nonconformance Report (2-87-0084) was immediately issued to identify and track the nonconforming weld. Niagara Mohawk Engineering dispositioned the nonconformance "accept as is" based upon ASME Section XI Acceptance Criteria. A fracture mechanics analysis was made to evaluate the significance of the weld defect. This analysis indicated that the weld defect would not have adverse effects to weld integrity throughout the life of the plant. Further, a 10 CFR 21 analysis (87-029) was performed. This analysis indicated that this condition was not reportable based on a fracture mechanics analysis using ASME Section XI acceptance criteria. A safety evaluation (SER 87-132) was performed. The evaluation indicated that this condition did not constitute an unreviewed safety question. This weld condition has been documented in the form of a Licensing Document Change Notice (LDCN) and will be incorporated into the next Final Safety Analysis Report update.



ADDITIONAL CORRECTIVE ACTIONS

There are no additional corrective actions necessary to avoid further recurrences since this was an isolated event. The specific radiographs have been rereviewed by the original inspectors to assure that they were aware of the nonconformance.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved when the Safety Evaluation was completed and the Nonconformance Report was dispositioned to "accept as is".





## VIOLATION B

10 CFR 50.55a(g) requires that ASME Code Class 1, 2, and 3 components meet the inservice inspection requirements set forth in the applicable edition of Section XI of the ASME Code. ASME Code Section XI, IWA 2300, 1980 Edition and Nine Mile Unit 1 site implementing procedure NES80A9069, Revision 10, invoke ANSI N45.2.6 standard requirement that a Level II visual examiner have four years of experience in testing or inspection or both of power plant, heavy industry or other similar facility equipment.

Contrary to the above, during July 6-10, 1987, an NRC review of the ISI contractor Procedure No. 80A9069, Revision 10 in use at the site, disclosed that the procedure required only six months of total experience rather than the ANSI N45.2.6 required four years.

This is a Severity Level V violation (Supplement II) and was identified at Unit 1, Docket No. 50-220.

## RESPONSE TO VIOLATION B

Niagara Mohawk admits to the violation as stated.

Niagara Mohawk has reviewed the qualifications of Nuclear Energy Services (NES) personnel that performed recent visual examinations at Nine Mile Point Unit 1 including the 1986 refueling outage Inservice Inspection plant interval. All NES Inspectors were fully qualified to perform visual examinations. A total of sixteen (16) NES Inspectors performed visual examinations during this period. Eleven (11) of the inspectors met the four years of experience required by ANSI N45.2.6-1973 for Level II visual examiners. After evaluating the experience, education, training and testing qualifications of the other five examiners, it was determined by Niagara Mohawk's Quality Assurance Department that they were qualified to perform visual inspections.

## CORRECTIVE ACTION

Niagara Mohawk Power Corporation will direct NES to revise its Quality Assurance Program Plans for Nine Mile Point Unit 1 and Unit 2 to require Level II Visual Examiners to meet the requirements of ANSI N45.2.6-1973 for four years experience in testing or inspection. The revised Quality Assurance Program Plans will be required for any future inspection at the Nine Mile Point Site.

## DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by October 16, 1987, when NES's Quality Assurance Program Plans will be revised and issued. The new revision references ANSI N45.2.6-1973 and all level II visual inspectors will have the required four (4) years experience.



INSPECTION OPEN ITEM 50-220/87-11-02

Inservice Inspection (ISI) Unit No. 1

During this inspection it was disclosed that the reactor vessel welds for Nine Mile 1 were not being ISI examined except for the upper head and nozzles. Further investigation revealed that relief from the code required volumetric examination for these welds had been granted by the NRC due to licensee's reported accessibility problems.

The inspector discussed the need for an updated feasibility study of reactor pressure vessel ISI in light of current state-of-the-art techniques with licensee representatives at the exit of this inspection and in a telephone conversation with Mr. G. Gresock of the licensee staff on August 20, 1987. This is an Unresolved Item (50-220/87-11-02).

RESPONSE

Niagara Mohawk Power Corporation will evaluate the possibility of volumetric examination of the Unit 1 Reactor Vessel belt line welds.

