

December 18, 1987  
(NMP1L 0209)

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

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

Gentlemen:

Attached is Niagara Mohawk's response to the Notice of Violation attached to the Commission's November 19, 1987 letter. This violation is based on an unresolved item (50-220/86-05-02) in the Nuclear Regulatory Commission Inspection Report 50-220/86-05.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



T. E. Lempges  
Vice President  
Nuclear Generation

GAG/pns  
4151G  
Attachment

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

~~87-2280260~~

3pp.



NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 1

LICENSE NO. DPR-63

RESPONSE TO NOTICE OF VIOLATION 50-220/86-05-02

Violation 50-220/86-05-02

As a result of the equipment qualification inspection conducted on April 14 - 18, 1986, and in accordance with the "General Statement of Policy for NRC Enforcement Actions," (10 CFR 2, Appendix C) (Enforcement Policy), the following violation was identified:

10 CFR 50.49 paragraphs (f) and (g) require that each item of electrical equipment important to safety be qualified and that qualification must be completed at a time no later than November 30, 1985.

Contrary to the above, on April 18, 1986, the inspector identified two Kerite cables, one Model HTK power cable wired to Limatorque valve actuator IV-31-07 and the other Model FR II control cable wired to Limatorque valve actuator FCV-80-118, whose qualification was not established at the time of the inspection in that 1) there was no qualification file set up to provide evidence for these cables' qualification, and 2) these cables were not included on the Equipment Qualification Master list. Information was provided to the inspector to establish the qualifiability of the cables.

Response

Niagara Mohawk admits that the qualification file and inclusion in the Master Equipment Qualification (EQ) list did not exist for the cables identified in the Notice of Violation. However, the following facts should be considered:

° All reasonable efforts were made to identify cables used in safety-related systems.

A comprehensive effort was made to collect and review all documents that could potentially identify cables used in safety-related applications. In the case of the two subject cables, engineering design documents were initially used to identify these cables. However, these documents did not correctly identify the type of cables installed.

Field verification of safety-related cable applications was made in late 1983, early 1984, during the 1984 refueling outage and following the 1984 refueling outage. These walkdowns did not cover 100% of the safety-related cables. The subject cables were not included in the group selected for field verification.



Response (Continued)

◦ Qualification test reports were available in the NMPC Equipment Qualification Master File for both cables identified in the subject violation at the time of the audit. The Qualification Test Report for type FRII cable was performed specifically for NMPC and was received in 1980; the Qualification Report including type HTK cable was received in 1983.

◦ A qualification file and Master EQ list is made on cables that have safety-related applications verified.

Qualification test reports are on hand for many items not included in the Master EQ list. This is done so that in the event of an emergency replacement or the discovery of an item not on the list, the Master EQ list can be corrected and the qualification file can be quickly established.

Corrective Actions:

Niagara Mohawk took timely action to correct the identified discrepancies. The cables identified during the inspection were added to the Master EQ list and a qualification file was established on April 18, 1986, prior to the exit meeting of April 18, 1986, establishing full compliance. In addition to this corrective action, preventative steps were taken to preclude future occurrences. Specifically, a full walkdown field verification of safety-related terminal boxes/devices associated with EQ equipment was performed during the 1986 refueling outage.

At no time since initial establishment of Equipment Qualification in accordance with 10 CFR 50.49 has any installed equipment been found to be "unqualified" for its environment.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10



REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8712280250 DOC. DATE: 87/12/18 NOTARIZED: NO DOCKET #  
 FACIL: 50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Powe 05000220  
 AUTH. NAME AUTHORITY AFFILIATION  
 EMPGES, T. E. Niagara Mohawk Power Corp.  
 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 871119 ltr re violations noted in Insp Rept  
 50-220/86-05. Corrective actions: discrepancies corrected &  
 cables identified during insp added to Master EQ list &  
 qualification file establishing full compliance created.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3  
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTTR	ENCL		LTTR	ENCL
	PD1-1 PD	1	1	BENEDICT, R	2	2
	HAUGHEY, M	2	2			
INTERNAL:	AEOD	1	1	DEDRO	1	1
	NRR MORISSEAU, D	1	1	NRR/DLPQ/PEB	1	1
	NRR/DOEA DIR	1	1	NRR/DREP/EPB	1	1
	NRR/DREP/RPB	2	2	NRR/DRIS DIR	1	1
	NRR/PMAS/ILRB	1	1	DE LIEBERMAN, J	1	1
	OGC/HDS1	1	1	REG FILE	1	1
	RES DEPY GI	1	1	RGNI FILE 01	1	1
INTERNAL:	LPDR	1	1	NRC PDR	1	1
	NSIC	1	1			



December 18, 1987  
(NMP1L 0209)

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

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

Gentlemen:

Attached is Niagara Mohawk's response to the Notice of Violation attached to the Commission's November 19, 1987 letter. This violation is based on an unresolved item (50-220/86-05-02) in the Nuclear Regulatory Commission Inspection Report 50-220/86-05.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



T. E. Lempges  
Vice President  
Nuclear Generation

GAG/pns  
4151G  
Attachment

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

8712280250 871218  
PDR ADDCK 05000220  
Q PDR

JE01  
11



NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 1

LICENSE NO. DPR-63

RESPONSE TO NOTICE OF VIOLATION 50-220/86-05-02

Violation 50-220/86-05-02

As a result of the equipment qualification inspection conducted on April 14 - 18, 1986, and in accordance with the "General Statement of Policy for NRC Enforcement Actions," (10 CFR 2, Appendix C) (Enforcement Policy), the following violation was identified:

10 CFR 50.49 paragraphs (f) and (g) require that each item of electrical equipment important to safety be qualified and that qualification must be completed at a time no later than November 30, 1985.

Contrary to the above, on April 18, 1986, the inspector identified two Kerite cables, one Model HTK power cable wired to Limitorque valve actuator IV-31-07 and the other Model FR II control cable wired to Limitorque valve actuator FCV-80-118, whose qualification was not established at the time of the inspection in that 1) there was no qualification file set up to provide evidence for these cables' qualification, and 2) these cables were not included on the Equipment Qualification Master list. Information was provided to the inspector to establish the qualifiability of the cables.

Response

Niagara Mohawk admits that the qualification file and inclusion in the Master Equipment Qualification (EQ) list did not exist for the cables identified in the Notice of Violation. However, the following facts should be considered:

° All reasonable efforts were made to identify cables used in safety-related systems.

A comprehensive effort was made to collect and review all documents that could potentially identify cables used in safety-related applications. In the case of the two subject cables, engineering design documents were initially used to identify these cables. However, these documents did not correctly identify the type of cables installed.

Field verification of safety-related cable applications was made in late 1983, early 1984, during the 1984 refueling outage and following the 1984 refueling outage. These walkdowns did not cover 100% of the safety-related cables. The subject cables were not included in the group selected for field verification.



Response (Continued)

° Qualification test reports were available in the NMPC Equipment Qualification Master File for both cables identified in the subject violation at the time of the audit. The Qualification Test Report for type FRII cable was performed specifically for NMPC and was received in 1980; the Qualification Report including type HTK cable was received in 1983.

° A qualification file and Master EQ list is made on cables that have safety-related applications verified.

Qualification test reports are on hand for many items not included in the Master EQ list. This is done so that in the event of an emergency replacement or the discovery of an item not on the list, the Master EQ list can be corrected and the qualification file can be quickly established.

Corrective Actions:

Niagara Mohawk took timely action to correct the identified discrepancies. The cables identified during the inspection were added to the Master EQ list and a qualification file was established on April 18, 1986, prior to the exit meeting of April 18, 1986, establishing full compliance. In addition to this corrective action, preventative steps were taken to preclude future occurrences. Specifically, a full walkdown field verification of safety-related terminal boxes/devices associated with EQ equipment was performed during the 1986 refueling outage.

At no time since initial establishment of Equipment Qualification in accordance with 10 CFR 50.49 has any installed equipment been found to be "unqualified" for its environment.

