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 PERRY, J.A. Niagara Mohawk Power Corp.
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SUBJECT: Forwards rev 6 to QA topical rept.

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MOHAWK**

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

July 25, 1991
NMPIL 0596

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

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

SUBJECT: REVISION 6 TO THE QUALITY ASSURANCE TOPICAL REPORT

Gentlemen:

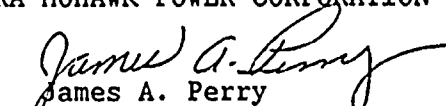
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Also enclosed is Attachment 2 which provides corrected pages to the Quality Assurance Program Responsibility Matrix and the Summary of Changes table in the Topical Report. If you have any questions, please feel free to contact me or W. A. Hansen at 315-349-7372.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION


James A. Perry
Vice President - Quality Assurance

JAP/NAS/mls
001561GG
Attachment

xc: Regional Administrator, Region I
Mr. W. L. Schmidt, Senior Resident Inspector
Mr. R. A. Capra, Project Director, NRR
Mr. D. S. Brinkman, Senior Project Manager, NRR
Mr. L. H. Bettenhausen, Chief, Operations Branch
Mr. F. L. Bower, Reactor Engineer, Region I
Mr. D. R. Haverkamp, Chief, Reactor Projects Section No. 1B
Mr. D. R. Taylor, Reactor Engineer, Region I
Records Management

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ATTACHMENT 1

Questions on QATR Revision 6 Submittal

Page 1-8 Matrix

1. *Q Why was Nuclear Security responsibilities dropped from Item II?*
A Typographical error. The "S" for support responsibility was omitted.
2. *Q Meter/Lab responsibility under Design (III) Why R (change from previous revision)?*
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3. *Q Why does Fuel Supply no longer support Design (III)?*
A There has been no change in the description of organizational responsibilities for Fuel Supply. It was considered that Fuel Supply is contract administration and that removing the "S" more clearly described their role.
4. *Q Reference to Paragraph 5.3 of ANS 3.2 was deleted from Procedure (V)?*
A Typographical error. Paragraph 5.3 of ANS 3.2 should be referenced.
5. *Q Inspection (X) why is 10S-2 of NQA-1 referenced vs. 10S-1?*
A Typographical error. The correct reference is 10S-1.

MATRIX PAGE 1-8 HAS BEEN CORRECTED. A CORRECTED PAGE IS ATTACHED.

Page 4-1 Paragraph 4.2.5d of Revision 5

1. *Q Why was "including necessary test and inspection" deleted?*
A Inspections and tests are included in the Quality Assurance programmatic requirements of NQA-1. Basic requirements 10 and 11 cover inspections and tests. Also the words "including necessary test and inspections" are just examples, and the intent is to invoke requirements that are consistent with the complexity and scope of the work.

Page 4-2 Paragraph 4.2.6

1. ***Q*** *Why was, "The Quality Assurance Department evaluates the acceptability of these documents during source and/or receipt inspection." deleted?*

A Paragraph 4.2.6 was revised because it was redundant with the inspection responsibilities stated in Paragraph 7.2.7.

Page 6-2 Paragraph 6.2.3 c, Revision 5

1. ***Q*** *Why was, "Performance and documentation of a review for concurrence with quality assurance related aspects by the Quality Assurance Department;" deleted?*

A These words were deleted because each of the Nuclear Division Departments under the Quality Assurance Program have a responsibility in developing procedures for ensuring that the procedures are correct in accordance with Paragraph 6.2.3(a)(b)(c). The Nuclear Division Quality Assurance Program includes QA overview through audit and surveillance of this process.

Page 7-1 Paragraph 7.2.3

1. ***Q*** *Why was "CASE" changed to "Nuclear Procurement Issues Committee" (NUPIC)? Who are the (NUPIC)?*

A CASE no longer exists. CASE and NSQAC merged in 1989 and formed NUPIC (Nuclear Procurement Issues Committee). NUPIC consists of representatives from each utility in the United States plus a representative from Canada.

2. ***Q*** *Why was last sentence added, "Alternately, items or services may be procured from suppliers and accepted based on appropriate inspection or verification activity."?*

A This was added to take into account the various provisions of Paragraph 3.2 of Regulatory Guide 1.28, Revision 3, which states that "external audits are not necessary for procuring items that are relatively simple and standard in design, manufacturing and testing; and adaptable to standard or automated inspections or tests of the end product to verify quality characteristics after delivery," and is described in Subparagraph 2 of 7.2.3.

Page 10-1 Paragraph 10.2.2

1. ***Q*** *Why was statement "review by QA Department" responsibility deleted?*

A Inspection process documents are prepared by many organizations, including the Quality Assurance Department, within the Nuclear Division. The Quality Assurance Department monitors this process through surveillance and audit as defined by Nuclear Division Procedures. Since the Quality Assurance Program is implemented by all organizations within the Nuclear Division, it was considered that these words should be removed.

2. *Q Are the individuals now doing inspections getting proper QA training?*

A. Yes. Any person performing inspections is trained as defined in Paragraph 10.2.3.

Page 10-2 Paragraph 10.2.5.

1. *Q Why were QA Department responsibilities deleted?*

A The QATR Rev. 5 inferred that only the Quality Assurance Department verified or performed inspections. Inspections are routinely performed by other organizations within the Nuclear Division such as the Maintenance Departments. The QATR was too definitive and removing the words Quality Assurance Department further emphasizes the responsibilities of other Nuclear Division organizations to the Quality Program. There has been no reduction in the Quality Assurance Program nor any deemphasis of the Quality Assurance Department responsibilities.

Attachment 1 - Summary of Changes

1. *Q Attachment 1 Summary of Changes only lists one procedure addition from Appendix C. Is this correct?*

A No; the addition of QAPs 10.31 and 16.05 were inadvertently left off Summary of Changes.

ATTACHMENT 1 SUMMARY OF CHANGES HAS BEEN CORRECTED. A CORRECTED PAGE IS ATTACHED.



ATTACHMENT 2

Corrected Sheets for QATR Revision 6 Submittal

QUALITY ASSURANCE PROGRAM RESPONSIBILITY MATRIX

Regulatory Requirements		Niagara Mohawk Power Corporation Department								
10CFR50 APP. B	NQA-1	ANS-3.2	NG	NE	MT	ML	QA	NS	FS	NSP
I. Organization	1, 1S-1	1 3.1 3.3 3.4.2	P	P	P	P	P	P	P	P
II. QA Program	2,2S-1 2S-2 2S-3	3.1 3.3 5.1 5.3 3.4.2 3.5	S	S	S	S	P,R	S	P	P
III. Design	3, 3S-1	5.2.7.2	S	P			R	S		S
IV. Procurement	4, 4S-1	5.2.13.1	P	P			R	P	P	P
V. Procedures	5	5.2.7 5.3	P	P	P	P	P,R	P	P	P
VI. Doc. Control	6,6S-1	5.2.15	P	P	P	P	P,R	P	P	P
VII. Purch. Items	7,7S-1	5.2.13.2	P	S			R	P	P	P
VIII. Item Control	8,8S-1	5.2.13.3	P	S			R	P	P	P
IX. Special Proc.	9,9S-1	5.2.18 5.2.12	P	P			P,R			S
X. Inspection	10,10S-1	5.2.17	P	S	S		P,R	P		S
XI. Testing	11,11S-1	5.2.19	P	S	S		R	P		P,S
XII. M&TE	12, 12S-1	5.2.16	P		P,S	P	R	P		
XIII. Hand. & Stg.	13,13S-1	5.2.13.4	P	S			R	P		P
XIV. Operating Status	14	5.2.6 5.2.14	P				R			S
XV. Nonconformance	15,15S-1	5.2.14	P	P			R	P	S	P,S
XVI. Corrective Action	16	5.2.11	P	P	S	S	P,R	P	S	S
XVII. Records	17,17S-1	5.2.12	P	P	S	S	S,R	P	P	P
XVIII. Audit	18,18S-1	4.5	P	P			P	P		

NMPC DEPARTMENT
 NG - Nuclear Generation
 NE - Nuclear Engineering
 NSP - Nuclear Support
 MT - Meter & Test
 ML - Meter & Laboratory
 QA - Quality Assurance
 NS - Nuclear Security
 FS - Fuel Supply

PROCEDURAL COVERAGE REQUIRED
 P - Primary Responsibility
 S - Support Responsibility
 R - Review, Audit and Surveillance
 Responsibility

ATTACHMENT 1

SUMMARY OF CHANGES QUALITY ASSURANCE PROGRAM TOPICAL REPORT FOR NINE MILE POINT NUCLEAR STATION OPERATIONS

QATR-1, REVISION 6

The following changes have been made to update or clarify certain sections of the report and to reflect organizational changes. All changes are marked in the margin with revision bars. Organizational changes will be listed here by page and section number only, non-organizational changes will be listed by page, section and a summary of the change.

PAGE	SECTION	SUMMARY OF THE CHANGE
1-1	1.1	
1-2	1.2.2	
1-3	1.2.2	
1-4	1.2.2	
1-5	1.2.2	
1-6	1.2.3	
1-7	FIGURE 1-1	REVISED ORGANIZATION CHART TO REFLECT CURRENT ORGANIZATION
1-8	FIGURE 1-2	MATRIX REVISED TO SHOW RESPONSIBILITIES AND DELETE REFERENCE TO INDIVIDUAL PROCEDURES
2-3	2.2.6 B	REVISED TO BE CONSISTENT WITH ANS 3.1
2-3	2.2.8 B	CHANGED "ANNUAL" TO "QA"
2-3	2.2.8	DELETED "A AND"
2-3	2.2.9	DELETED REFERENCES TO INDIVIDUAL DEPARTMENT PROCEDURES
2-4	2.2.11 B	ADDED "APPENDIX B DETERMINATIONS", ADDED "AN" IN FRONT OF ENGINEERING
2-4	2.2.11 C	ADDED "AND OTHERS AS SPECIFIED BY NMPC."
2-5	2.2.15 A	DELETED "ANNUALLY..IN WRITING TO THE PRESIDENT OF NMPC", ADDED ", THROUGH THE NUCLEAR DIVISION INTERNAL SALP TYPE ASSESSEMENT REPORTS."
2-5	2.2.15 B	CHANGED "CORPORATE STAFF MEETINGS, BOARD MEETINGS", TO "NMPC NUCLEAR OVERSIGHT COMMITTEE MEETINGS, CHIEF EXECUTIVE OFFICERS (CEOs) MEETINGS,"
3-1	3.2.2	
3-1	3.2.2 E	ADDED "E. MATERIAL AND SERVICE PROCUREMENT SPECIFICATIONS"
3-2	3.2.10	CHANGED "PLANT" TO "STATION"
3-3	3.2.11	COMBINED ITEMS 1 AND 2



PAGE	SECTION	SUMMARY OF THE CHANGE
3-3	3.2.13	ADDED "NUCLEAR ENGINEERING HAS OVERALL CONTROL OF DESIGN DOCUMENTS."
4-1	4.2.2	CHANGED "REQUISITION PACKAGES" TO "DOCUMENTS", DELETED "QUALITY ASSURANCE DEPARTMENT" AND ADDED "TECHNICAL," ADDED NOTE.
4-1	4.2.3	ADDED "IN CONJUNCTION WITH NUCLEAR PURCHASING"
4-1	4.2.5 A	ADDED "MATERIAL DESCRIPTION AND/OR"
4-1	4.2.5 C	COMBINED C AND D, ADDED "AND QA PROGRAMMATIC REQUIREMENTS OF ASME NQA-1 BASIC REQUIREMENTS AND WHERE APPROPRIATE OR ON AN EXCEPTION BASIS SUPPLEMENTAL REQUIREMENTS" , DELETED " , INCLUDING NECESSARY TESTS AND INSPECTIONS"
4-2	4.2.6	DELETED "THE QUALITY ASSURANCE DEPARTMENT EVALUATES THE ACCEPTABILITY OF THESE DOCUMENTS DURING SOURCE AND/OR RECEIPT INSPECTION."
4-2	4.2.7	CHANGED "REQUISITION" PACKAGES TO "DOCUMENTS"
4-2	4.2.7 A	DELETED "(SEE PARAGRAPH 4.2.5)"
5-1	5.2.3	DELETED "INCLUDE THE DEPARTMENTAL PROCEDURES", ADDED "ARE"
6-2	6.2.3 C	DELETED "C. PERFORMANCE AND DOCUMENTATION OF A REVIEW FOR CONCURRENCE WITH QUALITY ASSURANCE RELATED ASPECTS BY THE QUALITY ASSURANCE DEPARTMENT;"
7-1	7.2.3	CHANGED "CASE" TO "NUCLEAR PROCUREMENT ISSUES COMMITTEE", ADDED "ALTERNATELY, ITEMS OR SERVICES MAY BE PROCURED FROM SUPPLIERS AND ACCEPTED BASED ON APPROPRIATE INSPECTION OR VERIFICATION ACTIVITY."
7-1	7.2.3 1	ADDED "FOR ITEMS OR SERVICES SPECIFIED"
7-2	7.2.5	ADDED "AN" IN FRONT OF ENGINEERING
10-1	10.2.2	DELETED "OR REVIEWED BY THE QUALITY ASSURANCE DEPARTMENT", ADDED "ESTABLISHED"
10-2	10.2.5	ADDED "SUFFICIENT", CHANGED "QUALITY ASSURANCE DEPARTMENT" TO "SPECIFYING ORGANIZATION", DELETED "WORK MAY PROCEED UPON SUFFICIENT NOTICE TO QA OF THE IMPENDING WITNESS POINT."
11-1	11.2.2C	DELETED "PRE-OPERATIONAL", ADDED "SPECIAL"
11-2	11.2.5	DELETED "11.2.5 THE QUALITY ASSURANCE DEPARTMENT VERIFIES THAT TEST RESULTS ARE DOCUMENTED, EVALUATED AND ACCEPTED BY RESPONSIBLE PERSONNEL."
15-1	15.2.7	CHANGED "ITEMS" TO "CONDITIONS"
17-1	17.2.2I	ADDED "DEVIATION EVENT REPORTS; AND"
APP. A	A-1 AND A-2	REFORMATTED
APP. B	B-1	ADDED INTERPRETATION OF REG. GUIDE 1.28 PARA 3.2
APP. B	B-1 THRU B-11	REFORMATTED
APP. C	C-1	ADDED "QAP 15.02, 10.31, 16.05"

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 PERRY, J.A. Niagara Mohawk Power Corp.
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July 25, 1991
NMP1L 0596

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

Re: Nine Mile Point Unit 1
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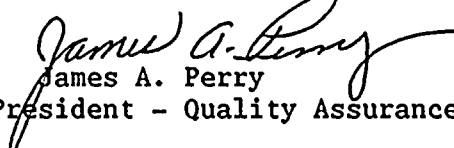
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James A. Perry
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Attachment

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PDR ADOCK 05000220
PDR

JEH 11



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ATTACHMENT 2

Corrected Sheets for QATR Revision 6 Submittal



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QUALITY ASSURANCE PROGRAM RESPONSIBILITY MATRIX

Regulatory Requirements	Niagara Mohawk Power Corporation Department									
10CFR50 APP. B	NQA-1	ANS-3.2	NG	NE	MT	ML	QA	NS	FS	NSP
I. Organization	1, 1-S1	1 3.1 3.3 3.4.2	P	P	P	P	P	P	P	P
II. QA Program	2,2S-1 2S-2 2S-3	3.1 3.3 5.1 5.3 3.4.2 3.5	S	S	S	S	P,R	S	P	P
III. Design	3, 3S-1	5.2.7.2	S	P			R	S		S
IV. Procurement	4, 4S-1	5.2.13.1	P	P			R	P	P	P
V. Procedures	5	5.2.7 5.3	P	P	P	P	P,R	P	P	P
VI. Doc. Control	6,6S-1	5.2.15	P	P	P	P	P,R	P	P	P
VII. Purch. Items	7,7S-1	5.2.13.2	P	S			R	P	P	P
VIII. Item Control	8,8S-1	5.2.13.3	P	S			R	P	P	P
IX. Special Proc.	9,9S-1	5.2.18 5.2.12	P	P			P,R			S
X. Inspection	10,10S-1	5.2.17	P	S	S		P,R	P		S
XI. Testing	11,11S-1	5.2.19	P	S	S		R	P		P,S
XII. M&TE	12, 12S-1	5.2.16	P		P,S	P	R	P		
XIII. Hand. & Stg.	13,13S-1	5.2.13.4	P	S			R	P		P
XIV. Operating Status	14	5.2.6 5.2.14	P				R			S
XV. Nonconformance	15,15S-1	5.2.14	P	P			R	P	S	P,S
XVI. Corrective Action	16	5.2.11	P	P	S	S	P,R	P	S	S
XVII. Records	17,17S-1	5.2.12	P	P	S	S	S,R	P	P	P
XVIII. Audit	18,18S-1	4.5	P	P			P	P		

NMPC DEPARTMENT
 NG - Nuclear Generation
 NE - Nuclear Engineering
 NSP - Nuclear Support
 MT - Meter & Test
 ML - Meter & Laboratory
 QA - Quality Assurance
 NS - Nuclear Security
 FS - Fuel Supply

PROCEDURAL COVERAGE REQUIRED
 P - Primary Responsibility
 S - Support Responsibility
 R - Review, Audit and Surveillance
 Responsibility



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ATTACHMENT 1

SUMMARY OF CHANGES QUALITY ASSURANCE PROGRAM TOPICAL REPORT FOR NINE MILE POINT NUCLEAR STATION OPERATIONS

QATR-1, REVISION 6

The following changes have been made to update or clarify certain sections of the report and to reflect organizational changes. All changes are marked in the margin with revision bars. Organizational changes will be listed here by page and section number only, non-organizational changes will be listed by page, section and a summary of the change.

PAGE	SECTION	SUMMARY OF THE CHANGE
1-1	1.1	
1-2	1.2.2	
1-3	1.2.2	
1-4	1.2.2	
1-5	1.2.2	
1-6	1.2.3	
1-7	FIGURE 1-1	REVISED ORGANIZATION CHART TO REFLECT CURRENT ORGANIZATION
1-8	FIGURE 1-2	MATRIX REVISED TO SHOW RESPONSIBILITIES AND DELETE REFERENCE TO INDIVIDUAL PROCEDURES
2-3	2.2.6 B	REVISED TO BE CONSISTENT WITH ANS 3.1
2-3	2.2.8 B	CHANGED "ANNUAL" TO "QA"
2-3	2.2.8	DELETED "A AND"
2-3	2.2.9	DELETED REFERENCES TO INDIVIDUAL DEPARTMENT PROCEDURES
2-4	2.2.11 B	ADDED "APPENDIX B DETERMINATIONS", ADDED "AN" IN FRONT OF ENGINEERING
2-4	2.2.11 C	ADDED "AND OTHERS AS SPECIFIED BY NMPC."
2-5	2.2.15 A	DELETED "ANNUALLY..IN WRITING TO THE PRESIDENT OF NMPC", ADDED ", THROUGH THE NUCLEAR DIVISION INTERNAL SALP TYPE ASSESSEMENT REPORTS."
2-5	2.2.15 B	CHANGED "CORPORATE STAFF MEETINGS, BOARD MEETINGS", TO "NMPC NUCLEAR OVERSIGHT COMMITTEE MEETINGS, CHIEF EXECUTIVE OFFICERS (CEOs) MEETINGS,"
3-1	3.2.2	
3-1	3.2.2 E	ADDED "E. MATERIAL AND SERVICE PROCUREMENT SPECIFICATIONS"
3-2	3.2.10	CHANGED "PLANT" TO "STATION"
3-3	3.2.11	COMBINED ITEMS 1 AND 2



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PAGE	SECTION	SUMMARY OF THE CHANGE
3-3	3.2.13	ADDED "NUCLEAR ENGINEERING HAS OVERALL CONTROL OF DESIGN DOCUMENTS."
4-1	4.2.2	CHANGED "REQUISITION PACKAGES" TO "DOCUMENTS", DELETED "QUALITY ASSURANCE DEPARTMENT" AND ADDED "TECHNICAL," ADDED NOTE.
4-1	4.2.3	ADDED "IN CONJUNCTION WITH NUCLEAR PURCHASING"
4-1	4.2.5 A	ADDED "MATERIAL DESCRIPTION AND/OR"
4-1	4.2.5 C	COMBINED C AND D, ADDED "AND QA PROGRAMMATIC REQUIREMENTS OF ASME NQA-1 BASIC REQUIREMENTS AND WHERE APPROPRIATE OR ON AN EXCEPTION BASIS SUPPLEMENTAL REQUIREMENTS" ,DELETED ", INCLUDING NECESSARY TESTS AND INSPECTIONS"
4-2	4.2.6	DELETED "THE QUALITY ASSURANCE DEPARTMENT EVALUATES THE ACCEPTABILITY OF THESE DOCUMENTS DURING SOURCE AND/OR RECEIPT INSPECTION."
4-2	4.2.7	CHANGED "REQUISITION" PACKAGES TO "DOCUMENTS"
4-2	4.2.7 A	DELETED "(SEE PARAGRAPH 4.2.5)"
5-1	5.2.3	DELETED "INCLUDE THE DEPARTMENTAL PROCEDURES", ADDED "ARE"
6-2	6.2.3 C	DELETED "C. PERFORMANCE AND DOCUMENTATION OF A REVIEW FOR CONCURRENCE WITH QUALITY ASSURANCE RELATED ASPECTS BY THE QUALITY ASSURANCE DEPARTMENT;"
7-1	7.2.3	CHANGED "CASE" TO "NUCLEAR PROCUREMENT ISSUES COMMITTEE", ADDED "ALTERNATELY, ITEMS OR SERVICES MAY BE PROCURED FROM SUPPLIERS AND ACCEPTED BASED ON APPROPRIATE INSPECTION OR VERIFICATION ACTIVITY."
7-1	7.2.3 1	ADDED "FOR ITEMS OR SERVICES SPECIFIED"
7-2	7.2.5	ADDED "AN" IN FRONT OF ENGINEERING
10-1	10.2.2	DELETED "OR REVIEWED BY THE QUALITY ASSURANCE DEPARTMENT", ADDED "ESTABLISHED"
10-2	10.2.5	ADDED "SUFFICIENT", CHANGED "QUALITY ASSURANCE DEPARTMENT" TO "SPECIFYING ORGANIZATION", DELETED "WORK MAY PROCEED UPON SUFFICIENT NOTICE TO QA OF THE IMPENDING WITNESS POINT."
11-1	11.2.2C	DELETED "PRE-OPERATIONAL", ADDED "SPECIAL"
11-2	11.2.5	DELETED "11.2.5 THE QUALITY ASSURANCE DEPARTMENT VERIFIES THAT TEST RESULTS ARE DOCUMENTED, EVALUATED AND ACCEPTED BY RESPONSIBLE PERSONNEL."
15-1	15.2.7	CHANGED "ITEMS" TO "CONDITIONS"
17-1	17.2.2I	ADDED "DEVIATION EVENT REPORTS; AND"
APP. A	A-1 AND A-2	REFORMATTED
APP. B	B-1	ADDED INTERPRETATION OF REG. GUIDE 1.28 PARA 3.2
APP. B	B-1 THRU B-11	REFORMATTED
APP. C	C-1	ADDED "QAP 15.02, 10.31, 16.05"

