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ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Forwards revised FSAR pages re QA program. Program will be fully effective for all QA activities upon completion of 100 h warranty run. Info will be incorporated info Amend 26 to FDSAR.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

March 14, 1986
(NMP2L 0659)

Ms. Elinor G. Adensam, Director
BWR Project Directorate No. 3
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Washington, DC 20555

Dear Ms. Adensam:

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

The NIAGARA MOHAWK POWER CORPORATION QUALITY ASSURANCE PROGRAM TOPICAL REPORT NINE MILE POINT NUCLEAR STATION UNITS 1 AND 2 OPERATIONS PHASE, NMPC-QATR-1, Revision 1, December 1985 was accepted December 31, 1985 by Mr. B. K. Grimes, Director, Division of Quality Assurance, Vendor and Technical Training Center Programs, Office of Inspection and Enforcement. This Topical Report will be implemented for Nine Mile Point Unit 2 as shown on the attached Final Safety Analysis Report pages. This information will be incorporated in Amendment 26.

It is our intent to proceed with a normal orderly transfer of the Quality Assurance Program as described on the attached pages. Basically, construction activities are addressed by the Preliminary Safety Analysis Report QA Program. Acceptance testing and Preoperational testing are governed by the Chapter 17 Final Safety Analysis Report program. During startup testing, all three programs, including the Topical Report, will be used.

After the time Nine Mile Point Unit 2 performs the 100 hour warranty run, the QA Topical Report will be fully effective for all QA activities. A letter will be provided indicating when the QA Topical Report will be the only governing program.

Very truly yours,

C. V. Mangan
Senior Vice President

NLR:ja
1381G
Attachment
xc: R. A. Gramm, NRC Resident Inspector
Project File (2)

B001 1/1

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

Niagara Mohawk Power Corporation) Docket No. 50-410

(Nine Mile Point Unit 2))

AFFIDAVIT

C. V. Mangan, being duly sworn, states that he is Senior Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

C V Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 13th day of March, 1986.

Christine Austin
Notary Public in and for
Onondaga County, New York

My Commission expires:
CHRISTINE AUSTIN
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4787687
My Commission Expires March 30, 1987

17.1 QUALITY ASSURANCE PROGRAM DURING OPERATION

Appendix D to the Unit 2 PSAR, as updated in accordance with 10CFR50 submitted under separate cover, defines the NMPC QA program used for the design and construction phase of Unit 2. This section describes the QA program to be used during the preliminary and preoperational testing phase of NMP2 including those preoperational/acceptance tests and retests performed in the period starting with fuel load and ending with the 100 hour warranty run. Startup testing and operational activities subsequent to preoperational testing will be governed by the Niagara Mohawk Power Corporation Quality Assurance Program Topical Report Nine Mile Point Nuclear Station Units 1 and 2 Operations Phase, NMPC-QATR-1, Revision 1. Figures 17.1-1 and 17.1-2 depict the organizational structure and lines of responsibility for the three program phases. Figure 17.1-2 also shows that during the interval between fuel load and full power commercial operation, all three programs will be employed to handle any components or systems requiring reworking or retesting by the construction and preoperational test groups at NMP2. Following the 100 hour warranty run at full power, the PSAR Appendix B and FSAR Chapter 17 programs will be replaced by the NMPC-QATR-1, Revision 1, Topical QA program.

17.1.1 Organization

17.1.1.1 General Organizational Structure

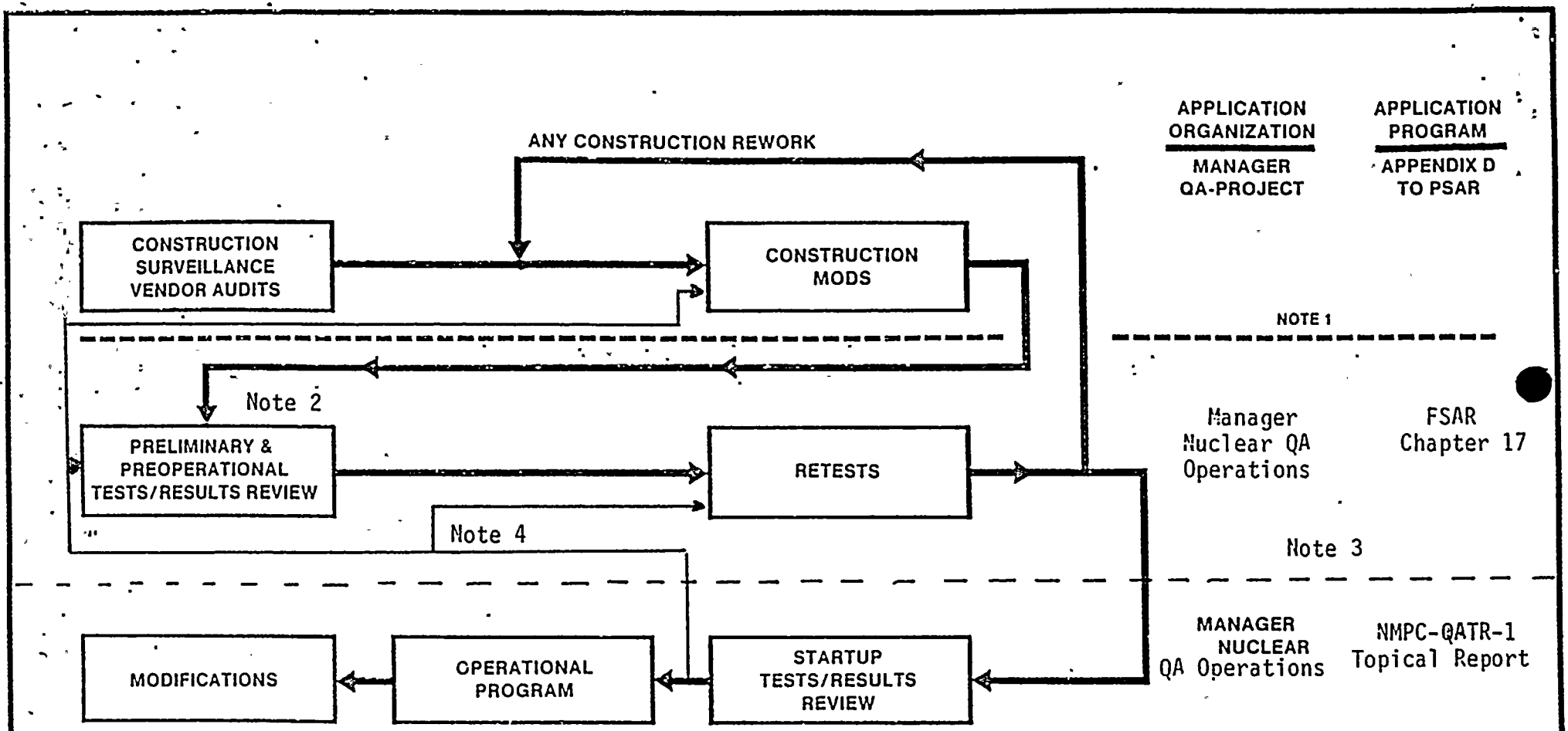
The QA Department is a corporate department under the direction of a Director of Quality Assurance (see Figure 17.1-1) who reports on quality matters to the President. Further definition of the administrative and functional organizations is included in the procedures developed to implement specific parts of this program. Table 17.1-1 contains tabular cross-references from 10CFR50 Appendix B to the applicable NMPC procedures. The QA Department regularly reviews the status and adequacy of the QA program, including a quality compliance review of all contractors and a self-appraisal.

The organization of the Safety Review and Audit Board (SRAB) and the Site Operations Review Committee (SORC) is discussed in Section 13.4.

QA-related activities are performed by other individuals and groups in accordance with the requirements of the NMPC QA program manuals and Appendix B to 10CFR50. The NMPC organizations that perform these activities for Unit 2 include:

1. Nuclear Engineering and Licensing.

2. Nuclear Construction.
3. Purchasing.
4. SRAB (Technical Specifications).
5. SORC (Technical Specifications).
6. Site Maintenance Superintendent Nuclear and Staff.
7. Technical Superintendent Nuclear and Staff.
8. Superintendent Chemical and Radiation Management.
9. Superintendent Training Nuclear.



NOTES:

1. THIS LINE DESIGNATES THE APPLICABLE QA MANAGER AND QA PROGRAM
2. SITE AUDITS OF THE INITIAL TEST PHASE ARE PERFORMED BY THE MANAGER OF QA PROJECTS IN ACCORDANCE WITH THE CHAPTER 17 QA PROGRAM FOR AN INTERIM PERIOD UNTIL FUEL LOAD
3. This line designates that activities subsequent to acceptance and preoperational testing are governed by QATR-1, Rev. 1.
4. Any required construction rework or retest under the acceptance/preoperational testing program are governed by the applicable QA Program.

FIGURE 17.1-2

APPLICABLE QA PROGRAM AND ORGANIZATION USED DURING PRELIMINARY TESTING/CONSTRUCTION, PREOPERATIONAL TESTING AND STARTUP TESTING/OPERATIONS

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT-UNIT 2
FINAL SAFETY ANALYSIS REPORT

TABLE 1.8-1 (Cont)

Regulatory Guide 1.28, Revision 2 (February 1979)

Quality Assurance Program Requirements
(Design and Construction)

FSAR Section Chapter 17 QA Topical Report QATR-1, Rev. 1

Position *

The Unit 2 project complies with the Regulatory Position (Paragraph C) of this guide.

*This commitment is modified at the time of the QA Topical Report implementation. At that time, the QATR-1, Rev. 1 supersedes this commitment.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.30, Revision 0 (August 1972)

Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment

FSAR Sections 3.11 and 7.2, Chapter 17, QA Topical Report QATR-1, Rev. 1

Position *

The Unit 2 project complies with the Regulatory Position (Paragraph C) of this guide.

The Unit 2 quality assurance program complies with Regulatory Guide 1.30 as described in Appendix VII of the Quality Assurance Manual for the project during construction. Unit 2 also complies with this regulatory guide as described in Chapter 17 of the FSAR.

Regulatory Guide 1.30, Rev. 0, endorses IEEE Standard 336-1971. Unit 2 Specification E061A, Electrical Installation, invokes IEEE Standard 336-1977, which is more conservative than IEEE Standard 336-1971.

Section 3 of IEEE-336 addresses the requirements for preinstallation verification of material and equipment. It also states that "it is not intended to duplicate inspections but rather to verify that items are in satisfactory condition for installation." Preinstallation verification includes the following:

1. Identification of materials and equipment.

2. Availability of procedures, instruction manuals, and special work instructions. 23

3. Review of records of storage and preventive maintenance measures.

4. Visual examination of materials and equipment to ensure physical integrity.

All these required verifications are addressed by the SWEC QA program for receipt, storage, and preventive maintenance inspections. These inspections meet the intent of IEEE-336, Section 3; therefore, additional preinstallation

*This commitment is modified at the time of the QA Topical Report implementation. At that time, the QATR-1, Rev. 1 supersedes this commitment.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.30, Revision 0 (August 1972)

verification is not done for the following components and materials (all equipment, however, is subject to preinstallation verification):

1. Balance-of-plant electrical components and materials such as terminal blocks, fuses, connectors, lugs, mounting hardware, etc. 23

2. PGCC electrical components and materials that are shipped separately from the main panels by GE, e.g., relays, meters, switches, connectors, lugs, mounting hardware, etc.

The above components and materials are subject to inprocess installation inspection and final installation inspections.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.37, Revision 0 (March 16, 1973)

Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants

FSAR Sections 4.5.1.4, 4.5.2.4, 6.1.1, and 17.2
QA Topical Report QATR-1, Rev. 1

Position *

The Unit 2 project complies with the Regulatory Position (Paragraph C) of this guide through the alternate approaches described below.

1. Paragraph C.3 The water quality for final flushes of fluid systems and associated components is at least equivalent to the quality of the operating system water, except for the oxygen content.

2. Paragraph C.4 Expendable materials, i.e., inks and related products, temperature indicating sticks, tapes, gummed labels, wrapping materials (other than polyethylene), water soluble dam materials, lubricants, NDT penetrant materials, and couplants that contact stainless steel or nickel alloy surfaces are in accordance with the Unit 2 Position for Regulatory Guide 1.38, Revision 2.

3. Due to seasonal conditions, freshwater from Lake Ontario will have an allowable upper pH limit of 8.5.

4. Upgraded piping systems and components constructed of carbon steel materials will meet Class B cleanness requirements except for final flushing/cleaning which may exhibit rust staining in accordance with Class C cleanness requirements. 9

The quality assurance requirements of Regulatory Guide 1.37 have been addressed in Appendix VII of the Quality Assurance Program Manual and Section 17 for the Unit 2 project.

Erection specifications and procedures for Category I fluid systems and associated components include the requirements of the guide as delineated above.

*This commitment is modified at the time of the QA Topical Report implementation. At that time,the QATR-1, Rev. 1 supersedes this commitment.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.38, Revision 2 (May 1977)

Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants

FSAR Section Chapter 17, QA Topical Report QATR-1, Rev. 1

Position *

The Unit 2 project complies with the Regulatory Position (Paragraph C) of this guide.

SWEC and NMPC QA program satisfies the QA requirements of Regulatory Guide 1.38 (Unit 2 QA Program Manual Appendix VII and Section 17).

* This commitment is modified at the time of the QA Topical Report implementation. At that time, the QATR-1, Rev. 1 supersedes this commitment.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.39, Revision 2 (September 1977)

Housekeeping Requirements for Water-Cooled Nuclear Power Plants

FSAR Section Chapter 17, QA Topical Report QATR-1, Rev. 1

Position *

The Unit 2 project complies with the requirements of the Regulatory Position (Paragraph C) of this guide.

Erection and installation specifications establish the requirements and the QA provisions to ensure compliance with this guide. Additionally, the requirements are implemented by site administrative procedures.

*This commitment is modified at the time of the QA Topical Report implementation. At that time, the QATR-1, Rev. 1 supersedes this commitment.

TABLE 1.8-1 (CONT)

Regulatory Guide 1.58, Revision 1 (September 1980) (Cont)

Qualification of Nuclear Power Plant
Inspection, Examination, and Testing Personnel

FSAR Section 2.4

Position

The Unit 2 project complies with the Regulatory Postion (Paragraph C) of this guide through the alternate approaches described below and in Chapter 14. | 22

BOP

The quality assurance program for Unit 2 is currently in compliance with Regulatory Positions C.5, 7, 8, and 10 of this regulatory guide. Regarding Regulatory Position C.6 of this regulatory guide and Section 3.5, Education and Experience Recommendations, of ANSI N45.2.6-1978, the following alternatives are proposed for personnel education and experience for each level:

3.5.1 Level I

1. Two years of related experience in equivalent inspection, examination, or testing activities, or

2. High school graduation/general education development (GED) equivalent and 6 months of related experience in equivalent inspection, examination, or testing activities, or

3. Completion of college-level work leading to an associate degree in a related discipline plus 3 months of related experience in equivalent inspection, examination, or testing activities.

4. Four-year college graduate plus 1 month of related experience or equivalent inspection, examination, or testing activities.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.58, Revision 1 (September 1980) (Cont)

3.5.2 Level II

1. One year of satisfactory performance as Level I or 5 years related experience in the corresponding inspection, examination, or test category or class, or

2. High school graduation/GED equivalent plus 3 years of related experience in equivalent inspection, examination, or testing activities, or

3. Completion of college-level work leading to an associate degree in a related discipline plus 1 year related experience in equivalent inspection, examination, or testing activities, or

4. Four-year college graduate plus 6 months of related experience in equivalent inspection, examination, or testing activities.

3.5.3 Level III

1. Six years of satisfactory performance as a Level II or 15 years of related experience in the corresponding inspection, examination, or test category or class, or

2. High school graduate/GED equivalent plus 10 years of related experience in equivalent inspection, examination, or testing activities; or high school graduation plus 8 years experience in equivalent inspection, examination, or testing activities, with at least 2 years as Level II, and with at least 2 years associated with nuclear facilities - or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility, or

3. Completion of college level work leading to an associate degree and 7 years of related experience in equivalent inspection, examination, or testing activities, with at least 2 years of this experience associated with nuclear facilities, or if not, at least sufficient training to be acquainted

TABLE 1.8-1 (Cont)

Regulatory Guide 1.58, Revision 1 (September 1980) (Cont)

with the relevant quality assurance aspects of a nuclear facility, or

4. Four-year college graduate plus 5 years of related experience in equivalent inspection, examination, or testing activities, with at least 2 years of this experience associated with nuclear facilities - or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility.

5. Graduate degree plus 3 years of related experience in equivalent inspection, examination, or testing activities, with at least 2 years of experience associated with nuclear facilities or, if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility.

NMPC

The NMPC quality assurance program for Unit 2 is currently in compliance with Regulatory Positions C.5, 6, 7, 8, and 10 of Regulatory Guide 1.58, Revision 1.

NSSS

General Electric startup operations personnel qualifications meet the requirements of this guide as described below:

1. Personnel are selected and trained according to the criteria of ANSI N18.1-1971 (NRC Regulatory Guide 1.8), with the exception of NRC Licensing.

2. The Operations Manager meets the equivalent of ANSI N18.1, Paragraph 4.2.2, Operations Manager. The Operations Manager is normally present for preoperational testing, and will therefore be qualified at the time that preoperational testing is begun.

3. The Operations Superintendent meets the equivalent of ANSI N18.1, Paragraph 4.3.1, Supervisors Requiring NRC Licenses. The Operating Superinten-

TABLE 1.8-1 (Cont)

Regulatory Guide 1.58, Revision 1 (September 1980) (Cont)

dent will normally be present for preoperational testing and therefore will be qualified at the time preoperational testing is begun.

4. The Shift Superintendents meet the qualification of ANSI N18.1, Paragraph 4.3.1, Supervisors Requiring NRC Licenses.

5. The Lead Startup Test Design and Analysis Engineer meets the qualifications of ANSI N18.1, Paragraph 4.4.1, Reactor Engineering and Physics. He will be qualified at the time of initial core loading or appointment to the position. His onsite responsibilities begin just prior to fuel loading.

6. The Startup Test Design and Analysis Engineers meet the qualifications of ANSI N18.1, Paragraph 3.3, Reactor Technical support personnel. Their onsite responsibilities begin just prior to fuel loading.

7. The Startup Control and Instrumentation Engineer meets the qualifications of ANSI N18.1, Paragraph 4.4.2, Instrumentation and Control. He will be qualified at the time preoperational testing is begun.

8. The Startup Chemist meets the qualifications of ANSI N18.1, Paragraph 4.4.3, Radiochemistry, utilizing cumulative experience from several reactor startup programs. He will be qualified at the time of the initial core loading.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.88, Revision 2 (October 1976)

Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records

FSAR Section Chapter 17, QA Topical Report QATR-1, Rev. 1

Position *

The Unit 2 project complies with the Regulatory Position (Paragraph C) of this guide, except to change ANSI N45.2.9-1974 Section 5.6, Paragraph 3 to "Two hour minimum rated facility" in accordance with NFPA 232-1980. Implementation is as described below.

Unit 2 Quality Assurance Records (and other required records) are stored in facilities designated as the Permanent Plant File and the Records Acceptance Center. In-process records are stored in controlled Intermediate Storage Facilities. Specific requirements for each include: 22

1. Permanent Plant File - Complies to the above paragraph of this position statement.

2. Records Acceptance Center - Complies with ANSI N45.2.9-1974, Section 5.3 to provide a mechanism to control records. The storage facility shall meet Section 5.6, except as follows:

   a. Structure has a minimum 2-hr fire rating.

   b. Doors, frames, and hardware have a 2-hr vault door.

   c. Electrical facilities shall be limited to ceiling lights, air-conditioning units, smoke detectors, and alarm circuits.

3. Intermediate Storage Facilities - Complies with ANSI N45.2.9-1974, Section 5.3 to provide a mechanism to control records. Each intermediate storage facility shall be evaluated by a Fire Protection Engineer to fulfill NFPA 232-1980 requirements. NOTE: All intermediate storage facilities will be eliminated as contractor work is concluded. 22

TABLE 1.8-1 (Cont)

The above controls and facilities are prepared to protect Quality Assurance records which take their physical form as radiographs, microfilm and paper.

1. Special handling and environmental storage considerations must be maintained for radiographs. 22

2. Designated archive (silver halide only) microfilm requires environmental storage considerations.

3. Use of fire-retardant cabinets is applicable to paper storage only.

Technical Justification

ANSI N45.2.9-1974 does not adequately define the storage facilities for inprocess quality records or NFPA requirements for fire rating of the facility. NFPA 232-1980, 1-3, emphasizes, "To consult with an experienced and competent Fire Protection Engineer or Records Protection Consultant." This position is based upon his recommendations. The Unit 2 Records Management Plan establishes the program for turnover, collection, review, transfer, receipt, verification, permanent plant file entry, and retention of all Unit 2 records with implementing policy guidelines which specify the facility types.

*This commitment is modified at the time of the QA Topical Report implementation. At that time, the QATR-1, Rev. 1 supersedes this commitment.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.94, Revision 1 (April 1976)

Quality Assurance Requirements For Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants

FSAR Section Chapter 17, QA Topical Report QATR-1, Rev. 1

Position *

The Unit 2 project complies with the Regulatory Position (Paragraph C) of this guide through the alternate approach described below.

1. ANSI N45.2.5-1974 Section 5.3 Bolt holes generally will not be burned (oxygen cut). If holes must be burned, the following criteria will be followed: a) after cutting, the edges of the cut will be ground or reamed back a minimum of 1/32 in, and b) the final bolt hole dimensions will not exceed those given in the Specification for Structural Joints Using ASTM A325 or A490 bolts.

2. ANSI N45.2.5-1974 Section 5.4 For the Unit 2 project, the criterion established for correct bolt length is one thread extending beyond the face of the nut.

3. ANSI N45.2.5-1974 Section 5.5 All reinforcing bar splices made by arc welding, except those splices welded to metal embedments, will be selected on a random basis for radiography as specified in the Unit 2-PSAR, Section 12.6.3, and inspected in accordance with AWS D12.1. Splices welded to metal embedments will be inspected in accordance with AWS 12.1. Additionally, sister splice testing will be done in accordance with Specification No. NMP2-S203C with the same frequency as specified for B-series sister splices when required by the engineers.

4. ANSI N45.2.5-1974 Section 6.2.2 Exceptions regarding mechanical splicing of QA Category I reinforcing bars can be found in Unit 2 Project Position 1.10.

* This commitment is modified at the time of the QA Topical Report implementation. At that time, the QATR-1, Rev. 1 supersedes this commitment.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.116, Revision 0-R (May 1977)

Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems

FSAR Section Chapter 17, QA Topical Report QATR-1, Rev. 1

Position*

The Unit 2 project complies with the Regulatory Position (Paragraph C) of this guide.

* This commitment is modified at the time of the QA Topical Report implementation. At that time, the QATR-1, Rev. 1 supersedes this commitment.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.123, Revision 1 (July 1977)

Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants

FSAR Section Chapter 17, QA Topical Report QATR-1, Rev. 1

Position *

The Unit 2 project complies with the Regulatory Position (Paragraph C) of this guide through the alternate approach described as follows:

Certain standard catalog or nonengineered items may be processed without seller prequalification. This alternative method is described in Section 7, paragraphs 1.4.1, 1.4.2, 1.4.3, and 3.1.2 of the Quality Assurance Program for Unit 2.

* This commitment is modified at the time of the QA Topical Report implementation. At that time, the QATR-1, Rev. 1 supersedes this commitment.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.144, Revision 1 (September 1980)

Auditing of Quality Assurance Programs
for Nuclear Power Plants

FSAR Section Chapter 17, QA Topical Report QATR-1, Rev. 1

Position *

The Unit 2 project complies with the Regulatory Position (Paragraph C) of this guide through the alternate approach described below.

The pre-audit and post-audit conferences required by Sections 4.3.1 and 4.3.3 of ANSI N45.2.12-1977 may be fulfilled by a variety of communications such as telephone conversations.

* This commitment is modified at the time of the QA Topical Report implementation. At that time, the QATR-1, Rev. 1 supersedes this commitment.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.146, Revision 0 (August 1980)

Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants

FSAR Section Chapter 17, QA Topical Report QATR-1, Rev. 1

Position

The Unit 2 project complies with Regulatory Position (Paragraph C) of this guide.