

07-441-91
Generic Ltr
83-28 L 1702

March 18, 1987
(NMP2L 1008).

**INFORMATION
ONLY**

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

Subject: Generic Letter 83-28

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

Gentlemen:

On November 13, 1986, a conference call was held with the following individuals: M. Haughey (NRR), M. Dev (Region I), D. Capton (Region I), G. Griffith (NMPC) and R. Randall (NMPC). The purpose of this call was to discuss Niagara Mohawk's responses to Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events." A subsequent discussion between Mr. G. Griffith, of Niagara Mohawk, and Messrs. M. Dev and D. Capton, of Region I, was held on January 8, 1987, to verify the questions posed by Messrs. Dev and Capton. The questions and our responses, including the latest status of our actions, are provided below:

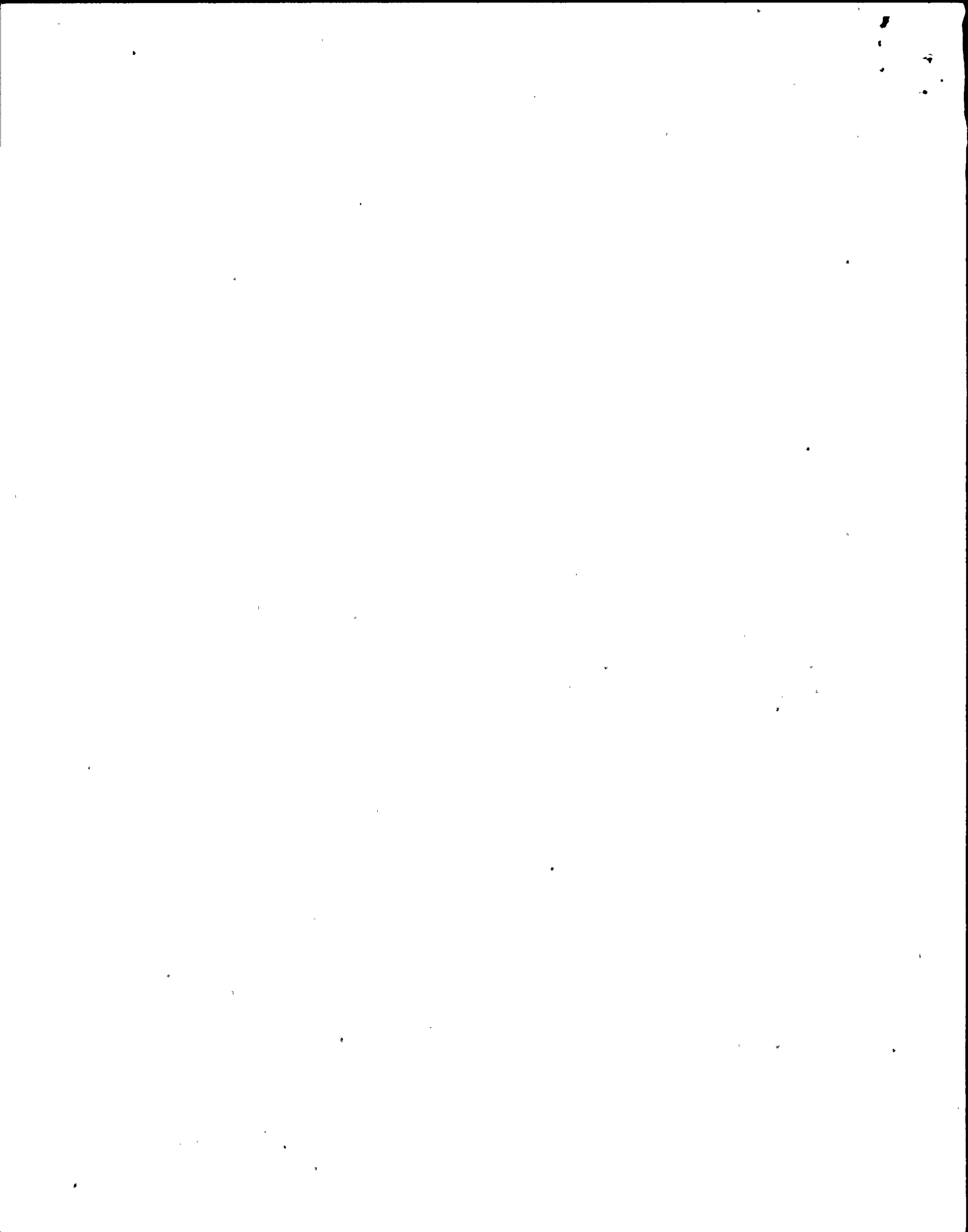
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Response: The Project Procedures are in the process of being replaced by Site Services Procedures and Niagara Mohawk Departmental procedures, as appropriate. All the Project Procedures will be replaced or cancelled by commercial operation.

2. Question: Are all Post-Maintenance Testing Procedures now in effect?

Response: Post-Maintenance testing requirements, presently identified as required, are part of the Maintenance procedures. All procedures for Electrical Maintenance, Mechanical Maintenance and Instrument & Control Maintenance have been issued and are in effect. All issued maintenance procedures have been approved per Procedure AP-2.0, "Production and Control of Procedures." Procedure AP-2.0 describes all required independent reviews and identifies the Administrative Procedures as defining the total program responsibilities for operation and maintenance of the station.

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Procedure AP-5.2, "Procedure for Repair," provides the program for post-maintenance testing after completion of corrective maintenance on safety related components. Appendix C of AP-5.2 provides the specific post-maintenance testing criteria which establish the extent of testing following a maintenance activity. (A copy of the Table of Contents to AP-5.2 is attached.)

3. Question: When will procedure AP-2.0, "Production and Control of Procedures," be applicable to both Units?

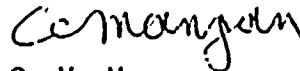
Response: The latest revision of Procedure AP-2.0, as well as all Site Administrative Procedures, are now applicable to both Unit 1 and Unit 2. This meets the commitment in Section 13.5.1.2 of the Unit 2 FSAR, which calls for incorporation of Unit 2 into the existing Unit 1 Site Administrative Procedures. All Niagara Mohawk procedures issued for use subsequent to issuance of Unit 2 Operating License have been approved per Administrative Procedure AP-2.0.

A copy of the Title page and Table of Contents for Procedure AP-2.0 is attached. Also attached is a copy of Section 11.1.1 of AP-2.0, which describes the requirement for identification of the applicable Unit on the Title page of procedures prepared per AP-2.0.

In addition to the actions described above, the following actions have been taken to identify any recommendations from engineering on equipment testing. All correspondence from Niagara Mohawk Project Engineering to the Nine Mile Point Unit 2 Station Superintendent was reviewed (approximately 225 documents). Also, selected engineers were interviewed to determine if they had any specific testing recommendations. No additional testing recommendations were identified.

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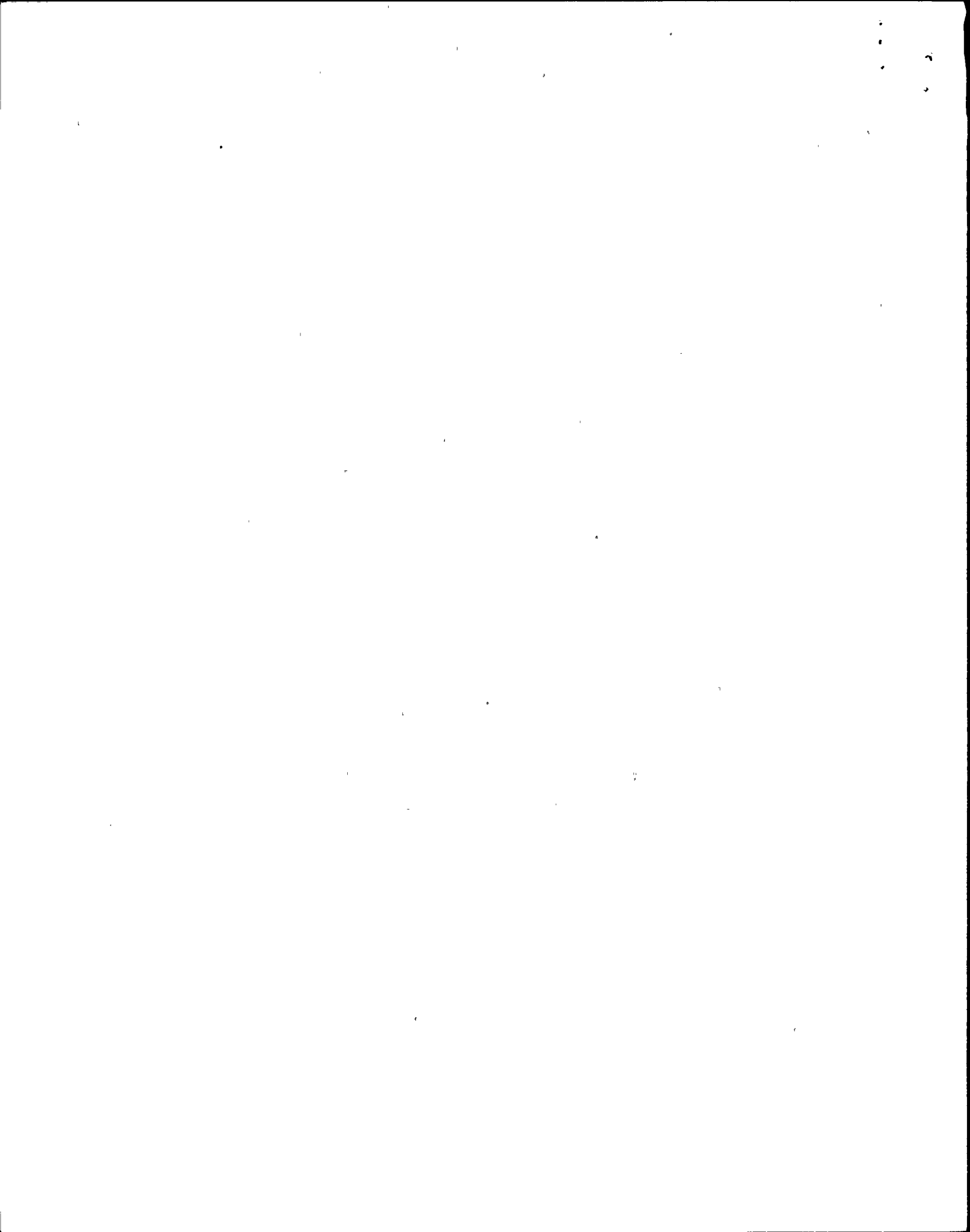
C. V. Mangan
Senior Vice President

GAG/pns
2593G
Attachments

xc: Regional Administrator, Region I
Ms. E. G. Adensam, Project Director
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Project File (2)

AP-5.2
PROCEDURE FOR REPAIR
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- 4.0 Report of System or Component Malfunction or Deficiency
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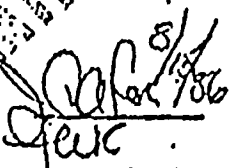
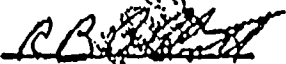
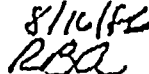

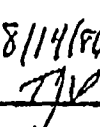
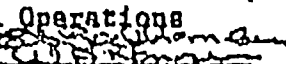
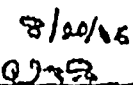


NINE MILE POINT NUCLEAR STATION

ADMINISTRATIVE PROCEDURE

PROCEDURE NO. AP-2.0

PRODUCTION AND CONTROL OF PROCEDURES



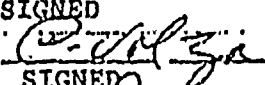

<u>APPROVALS</u>	<u>SIGNATURES</u>	<u>REVISION 6</u>	<u>REVISION 7</u>	<u>REVISION 8</u>
Station Superintendent NMPNS Unit 1 T. W. Roman		 8/1/86		
Station Superintendent NMPNS Unit 2 R. B. Abbott		8/16/86 		
General Superintendent Nuclear Generation T. J. Perkins		8/14/86 		
Quality Assurance Concurrence Manager Nuclear, QA Operations W. A. Hansen		8/20/86 		

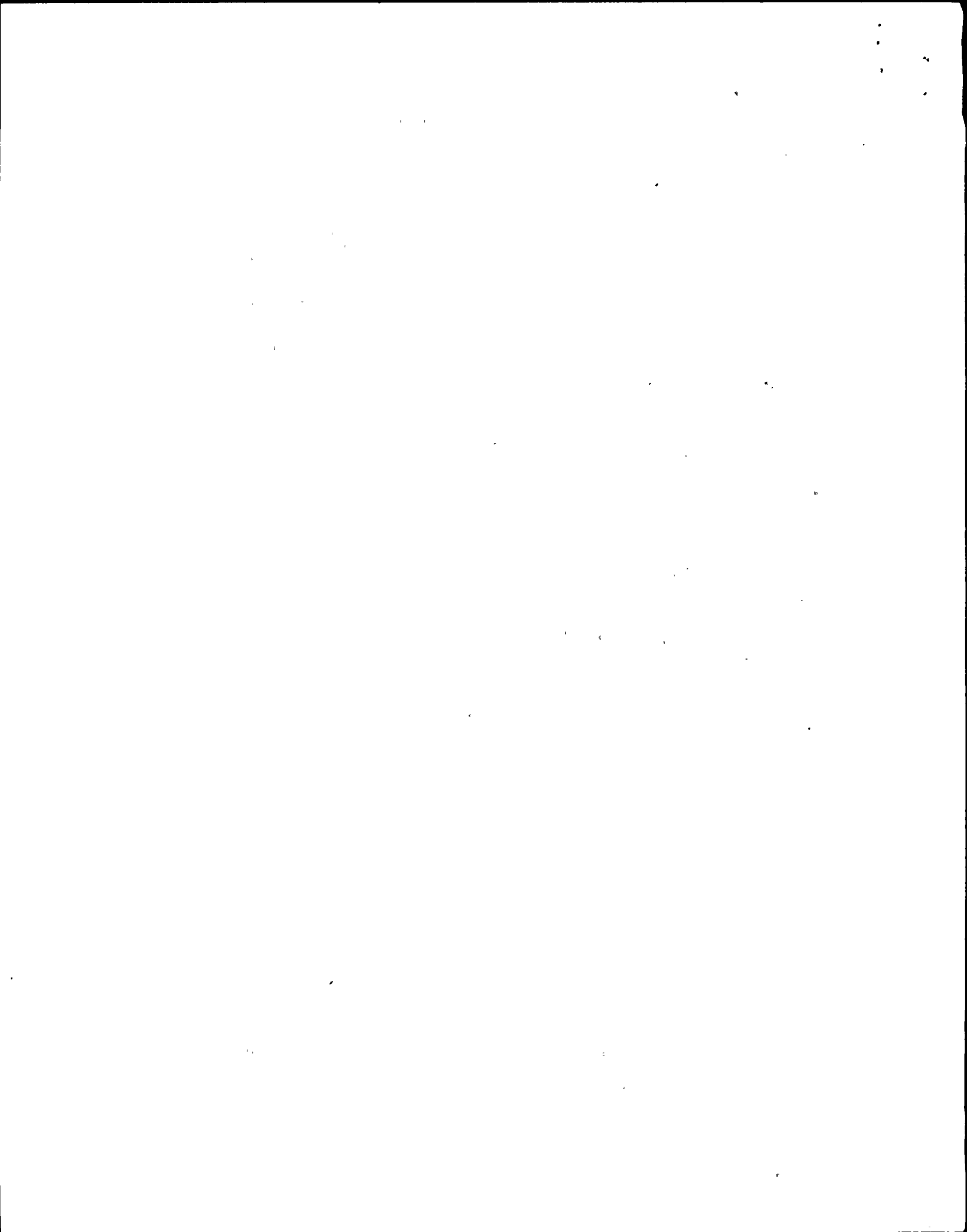
Summary of Pages

Revision 6 (Effective 8/20/86)

<u>PAGES</u>	<u>DATE</u>
11, 22, 26, 27	January 1986
11, 2, 4, 5, 8-10, 21, 32	March 1986
1, 3, 6, 11, 13-20, 28-31	August 1986
*12	October 1986 (Reissue)
1, 7, 16, 23- 24	December 1986 (Reissue)
*25	January 1987 (Reissue)

NIAGARA MOHAWK POWER CORPORATION

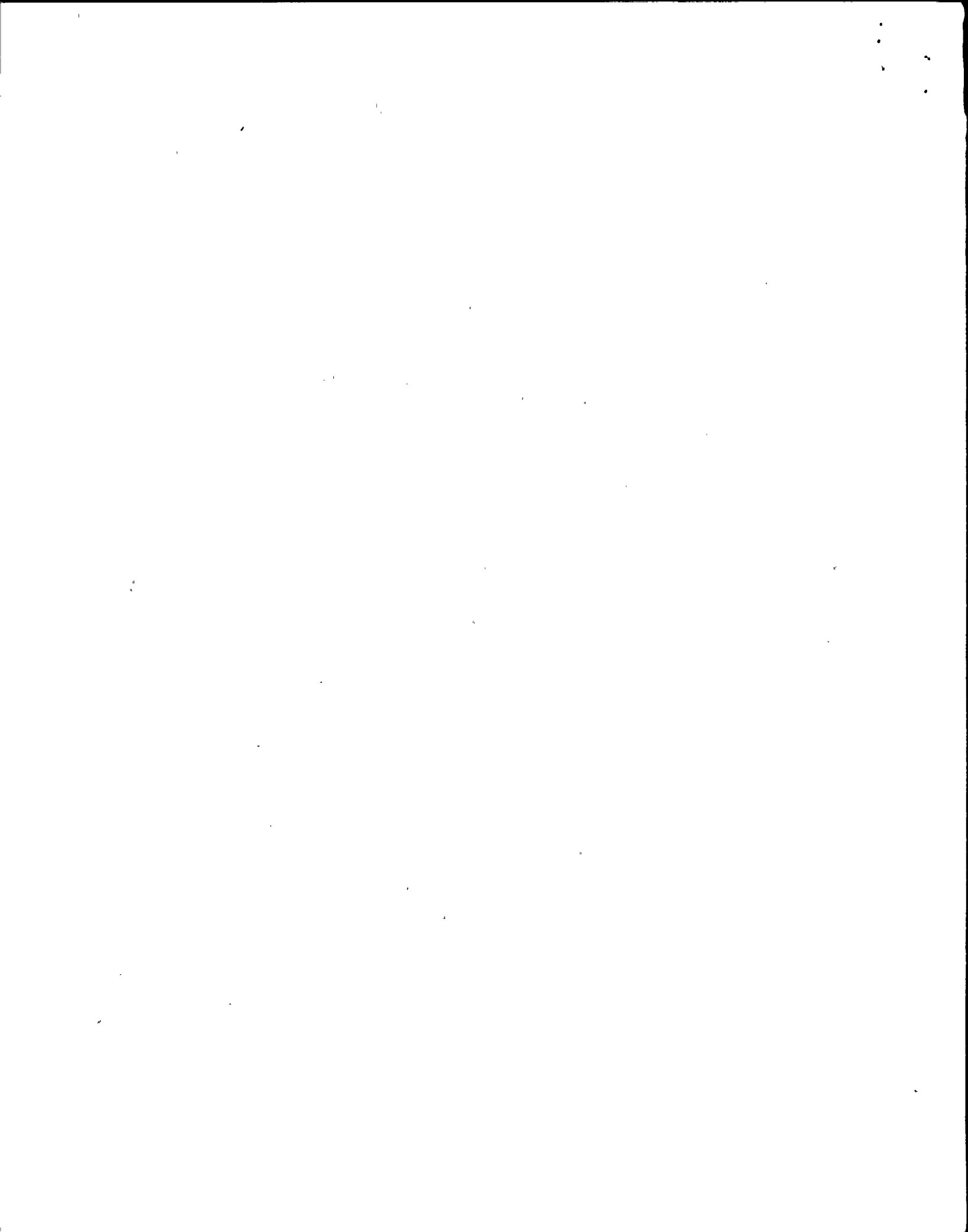
- *CHANGES PER SECTION 11.5, AP-2.0  10/8/86
SIGNED DATE THIS PROCEDURE NOT TO BE USED AFTER August 1988. SUBJECT TO PERIODIC REVIEW.
- *CHANGES MADE PER SECTION 11.5 AP-2.0  10/12/86
SIGNED DATE
- *CHANGES MADE PER SECTION 11.5 AP-2.0  12/22/86
SIGNED DATE
- *CHANGES MADE PER SECTION 11.5 AP-2.0  1/6/87
SIGNED DATE



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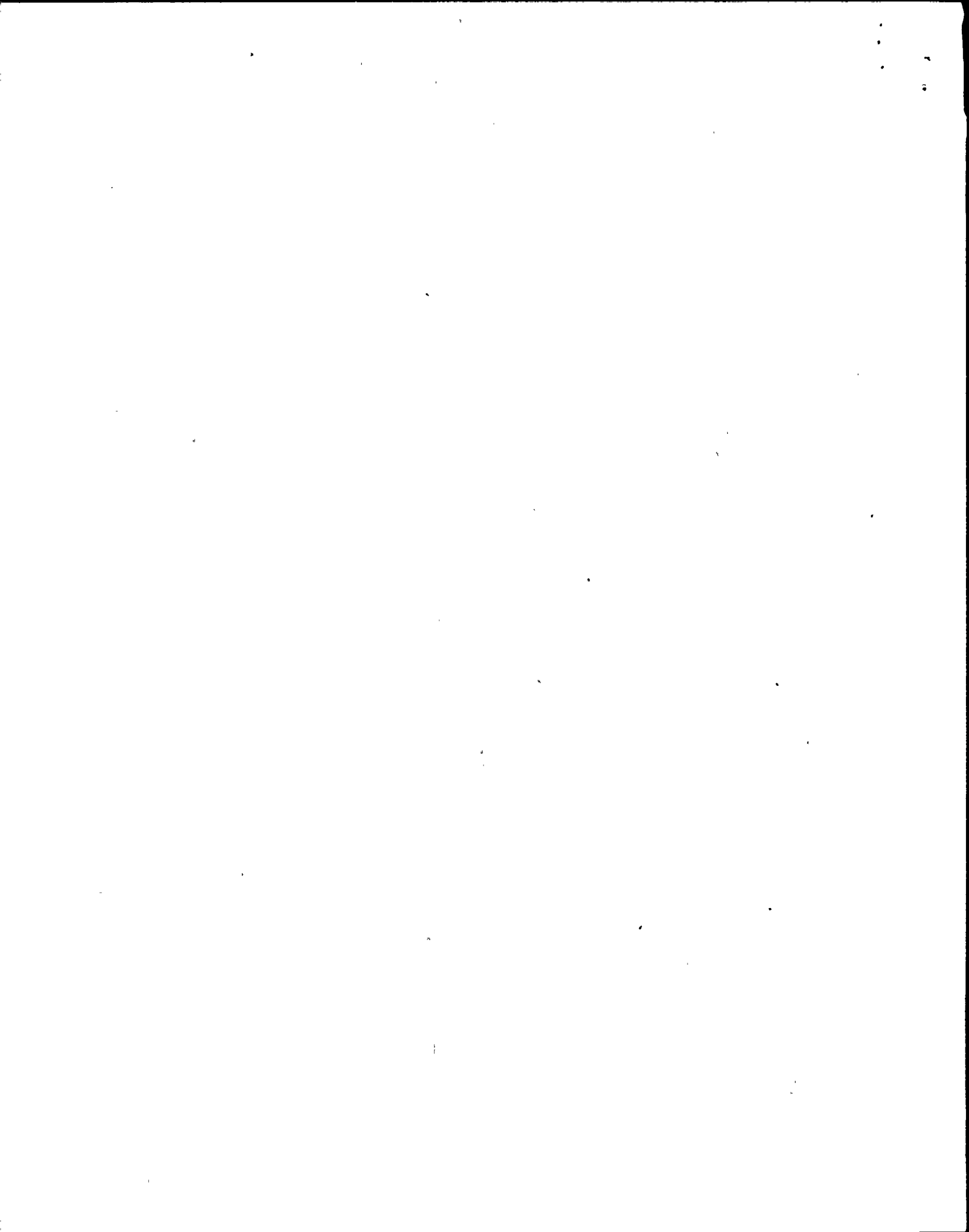


AP-2.0

PRODUCTION AND CONTROL OF PROCEDURES

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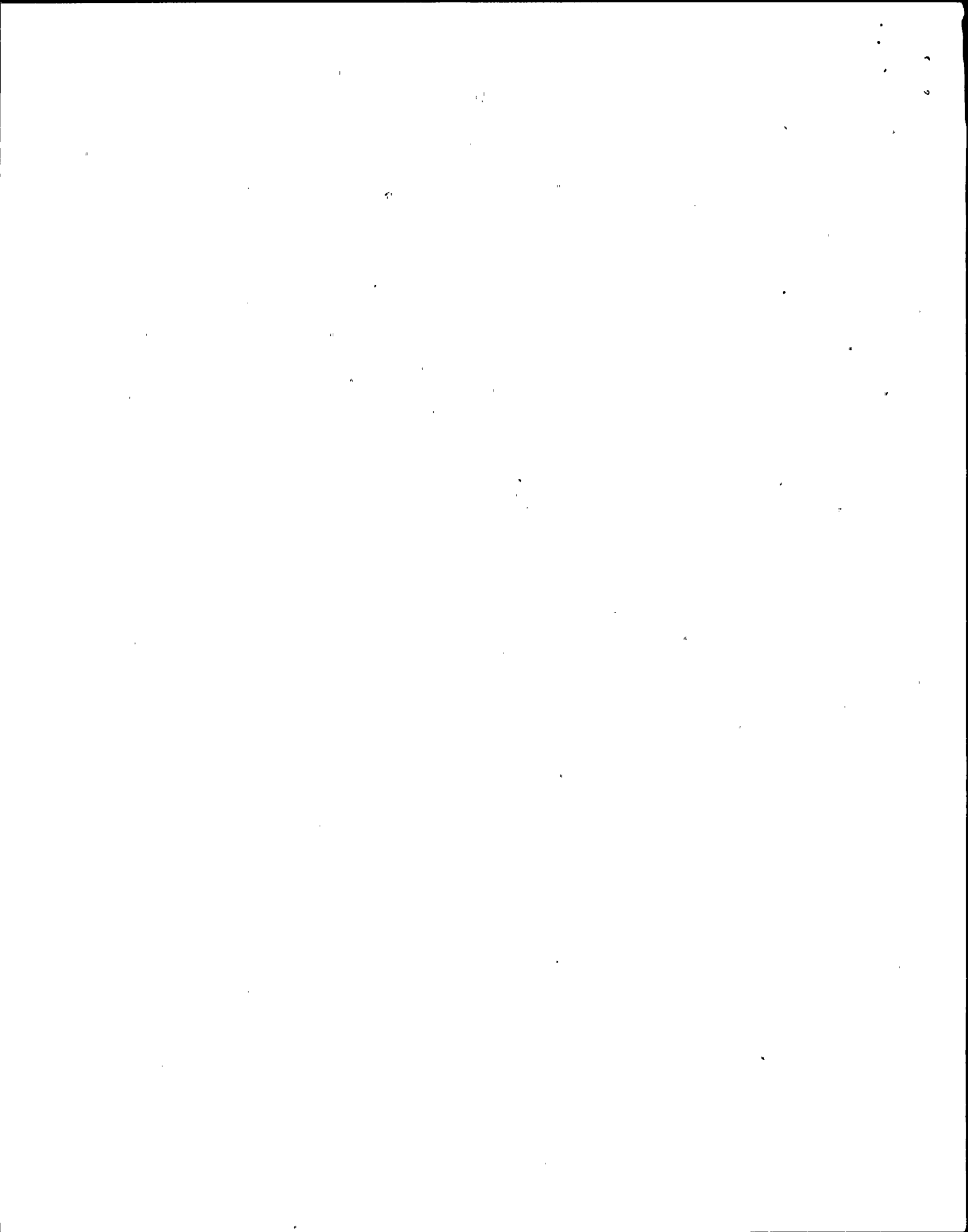


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10.2.2 Temporary Change - Made Permanent

For Temporary Change Notices identified as "IN EFFECT UNTIL NEXT REVISION", immediately following approval by the General Superintendent or Designee, a copy of the TEMPORARY CHANGE NOTICE and affected pages shall be attached to front of the Master Copy of the procedure. This ensures that personnel using procedures are in compliance with Technical Specification, since evidence of the action and approval will be provided.

The original of the change with its TEMPORARY CHANGE NOTICE is sent to the procedures typing group for publication and/or inclusion in the procedures historical file. Upon issuance, the marked and approved TEMPORARY CHANGE NOTICE shall be maintained in station historical files, but purged from the Master and Working copies. This action will provide a feedback mechanism for temporary changes.

10.2.3 Non-Compliance of Temporary Change

If the independent reviewers and/or the General Superintendent or designee determines that the temporary change is not in compliance with Technical Specifications, refer to AP-10.2.2 for reporting requirements.

10.2.4 Use of the TEMPORARY CHANGE NOTICE for jumpers is not covered by this procedure, but is provided for in AP-3.3.2. When so used, the TEMPORARY CHANGE NOTICE shall be processed in the same manner as provided for changes to procedures, except that a copy of the TEMPORARY CHANGE NOTICE is attached to the jumper/block log instead of the Master Copy and Working Copy.

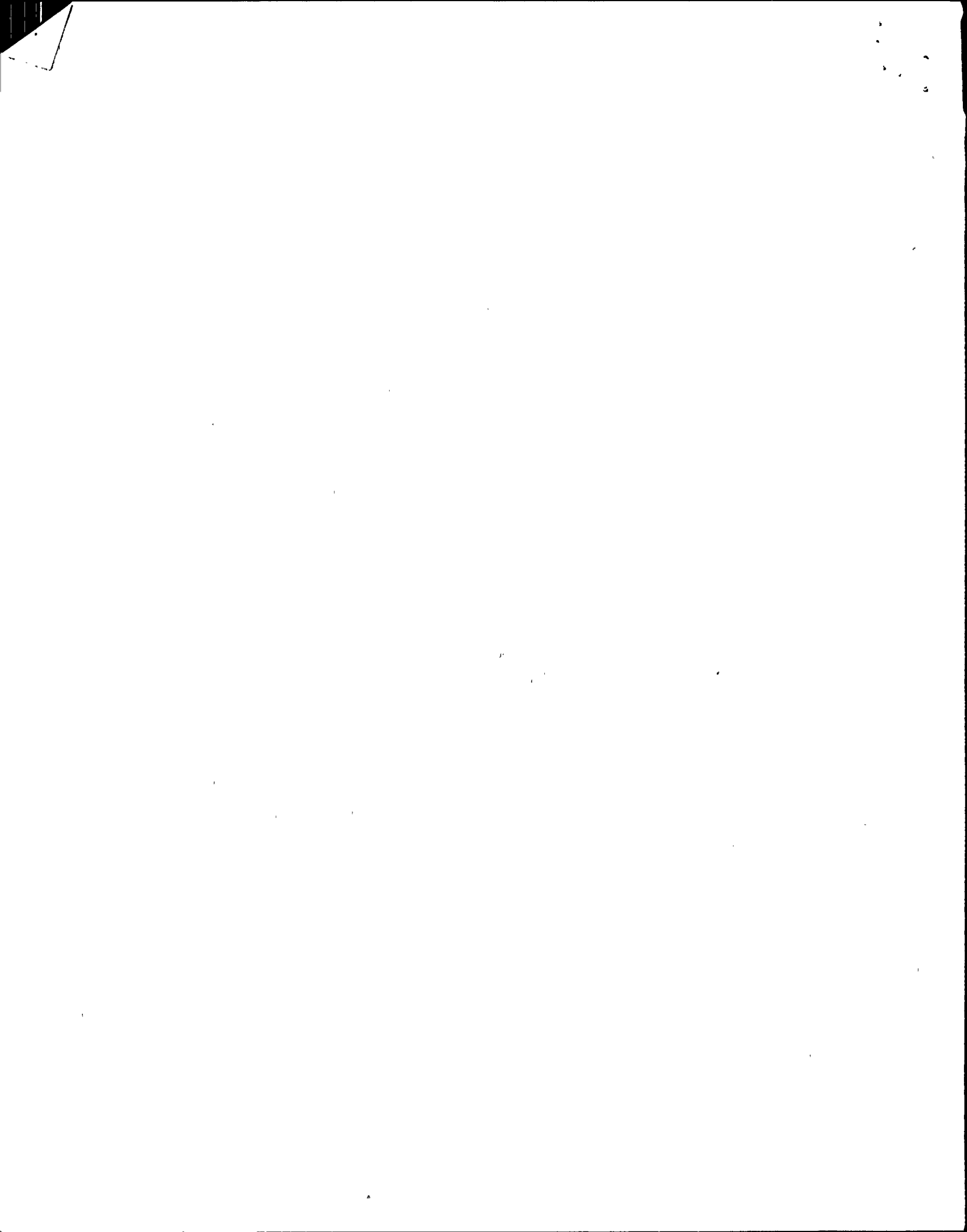
11.0 PUBLICATION AND MAINTENANCE OF PROCEDURES

11.1 Publication Format

11.1.1 Title Page

Every procedure, instruction, or order shall have a title page which shall contain the following information:

1. The name of the company, Niagara Mohawk Power Corporation.
2. The name of the station and unit as: Nine Mile Point Nuclear Station Unit No. 1 or just: Nine Mile Point Nuclear Station, if generally applicable to all units on the site.
3. Procedure Type from Fig. 2.0-1.



C 11.1 (Cont.d)

4. The number and title of the procedure, instruction, or order.
5. A tabulation listing the names and titles of all persons approving the procedure with provision for entering signatures.
6. Approval of a revision as indicated by date and initial under the revision number of a previously signed title page.
7. The following statement should be included on each procedure cover sheet:

THIS PROCEDURE NOT TO BE
USED AFTER (Date)
SUBJECT TO PERIODIC REVIEW

Each time a new document or revision is issued, a tabulation should be provided listing all the pages and dates. This is so that the holder will know that he has all of the correct sheets applicable to the edition approved on the cover sheet. A suggested model cover sheet is attached to this procedure. (Figure 2.0-2)

11.1.2 Revisions and Changes

Revisions shall be published on revised pages or incorporated in a completely reprinted edition and shall be subject to the same rules for the production, review, concurrence, publication, and distribution as the original procedure.

11.1.3 Page Identification

A page number, procedure number, and date of issue shall be printed on each procedure page. Whenever the content of a given numbered page is changed for any reason, such as revision or the repositioning of the text or a set of pages due to retyping, a new date of publication shall be shown. The latest revision in the text is delineated by a vertical line in the margin marked with the revision number or an (*) in the case of a section 11.5 change. When an entire procedure page or procedure is completely revised as noted on the title page, a margin line delineating the change is not required. A suggested model page format is included with this procedure. (Figure 2.0-3)

11.2 Index and Numbering of Procedures

- 11.2.1 Lists of all procedures, instructions, or orders called for in Administrative Procedures shall be maintained under the control of the Supervisor Administrative Services. These lists shall contain the procedure or standing order number, title, revision number, and revision date for each document. The office lists shall be maintained current, and when changes have been made, revised indexes should be published at least quarterly. A log of Temporary Change Notices is maintained per OI-7.

10

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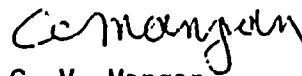
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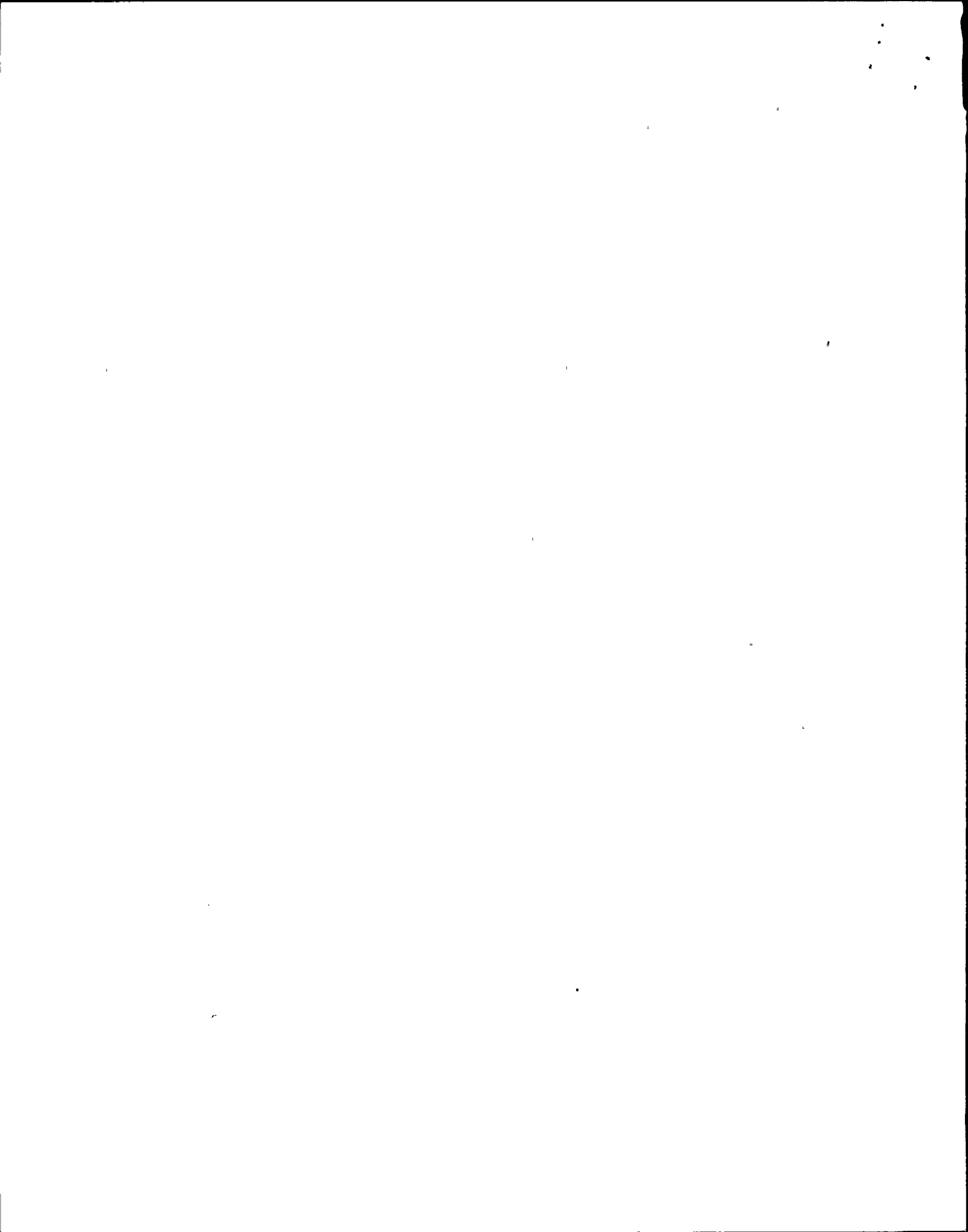
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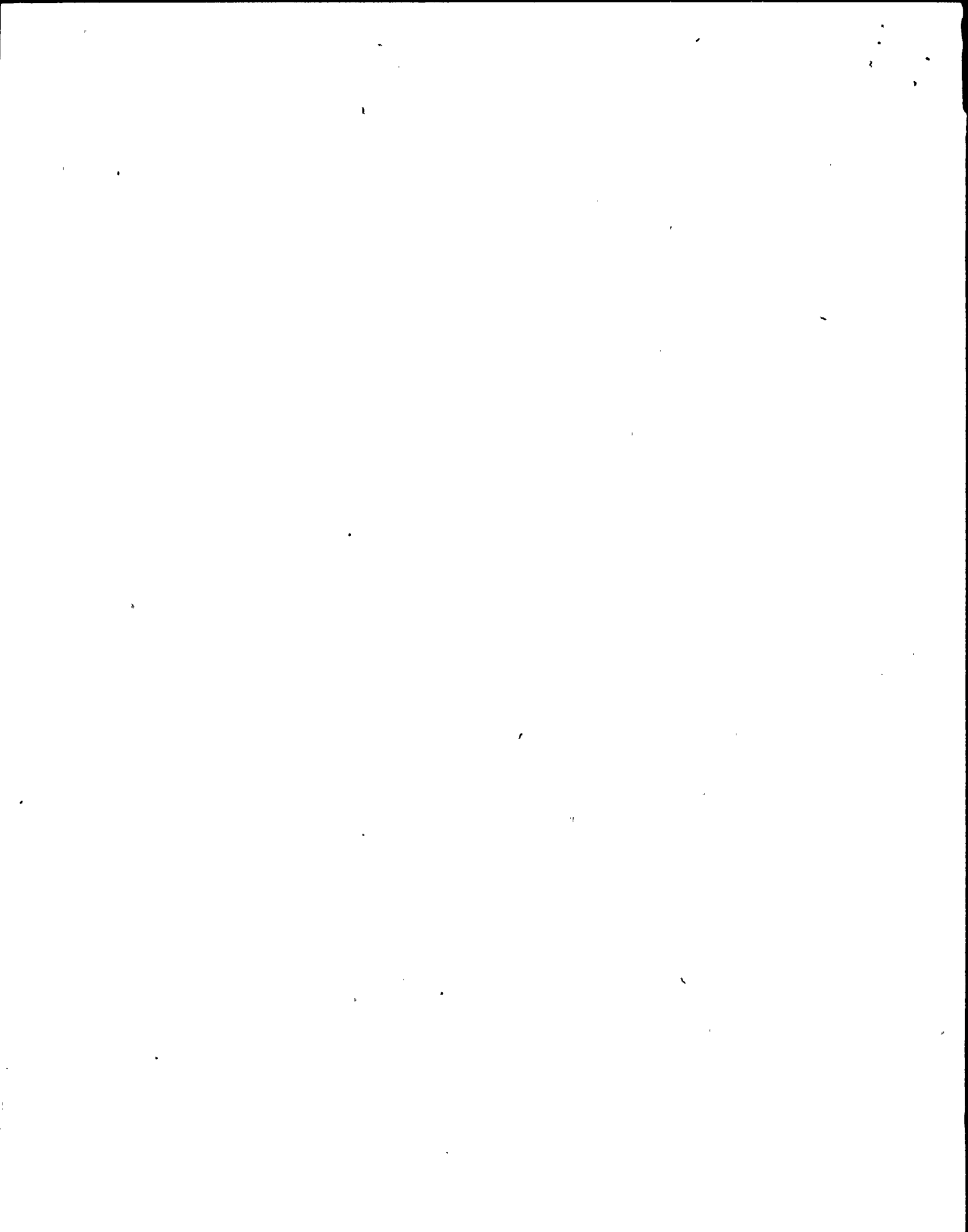
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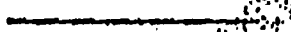
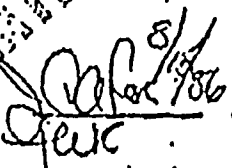

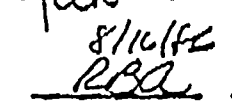

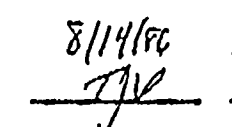

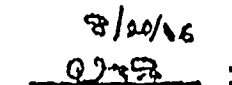


NINE MILE POINT NUCLEAR STATION

ADMINISTRATIVE PROCEDURE

PROCEDURE NO. AP-2.0

PRODUCTION AND CONTROL OF PROCEDURES



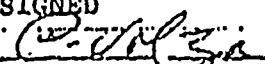

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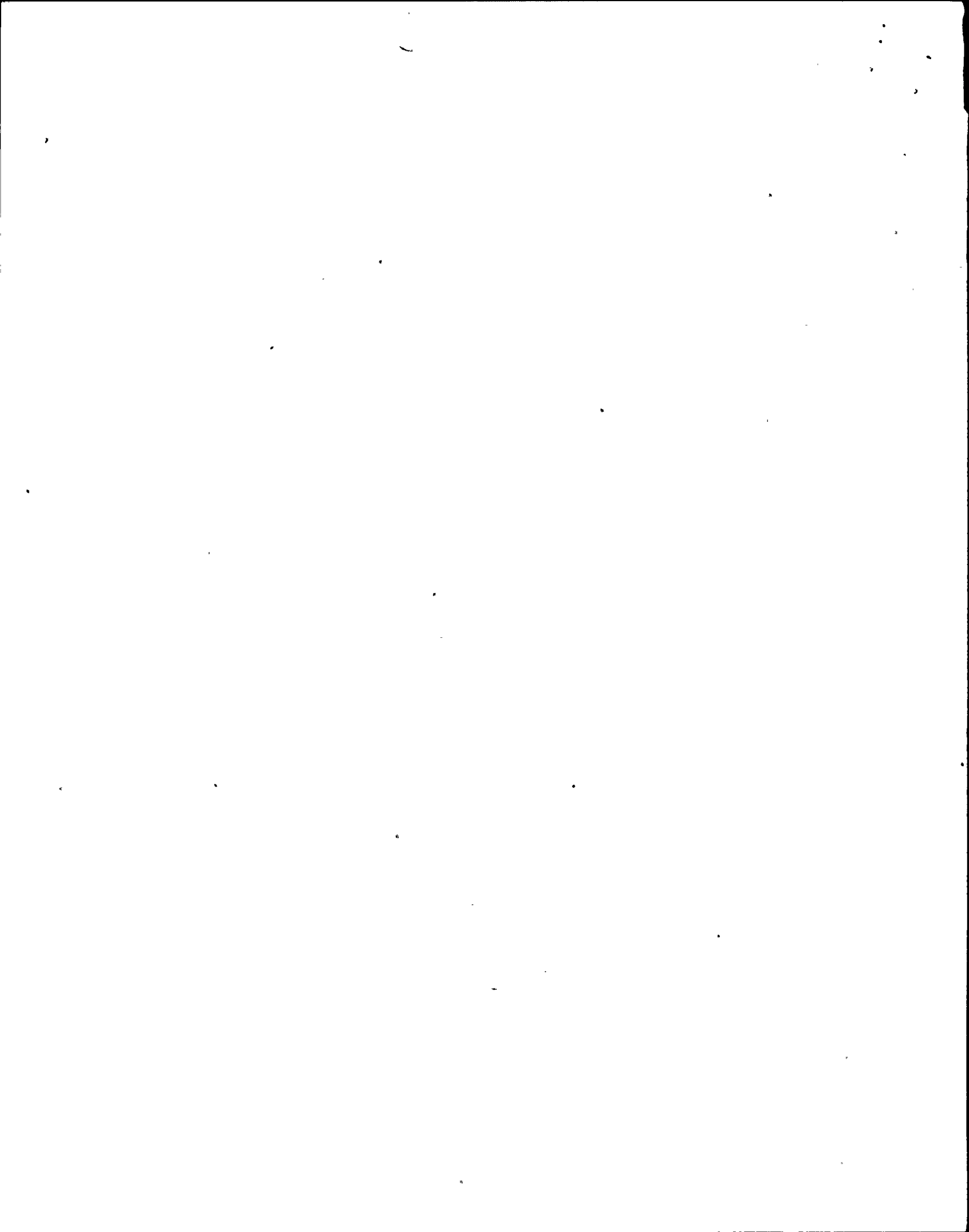
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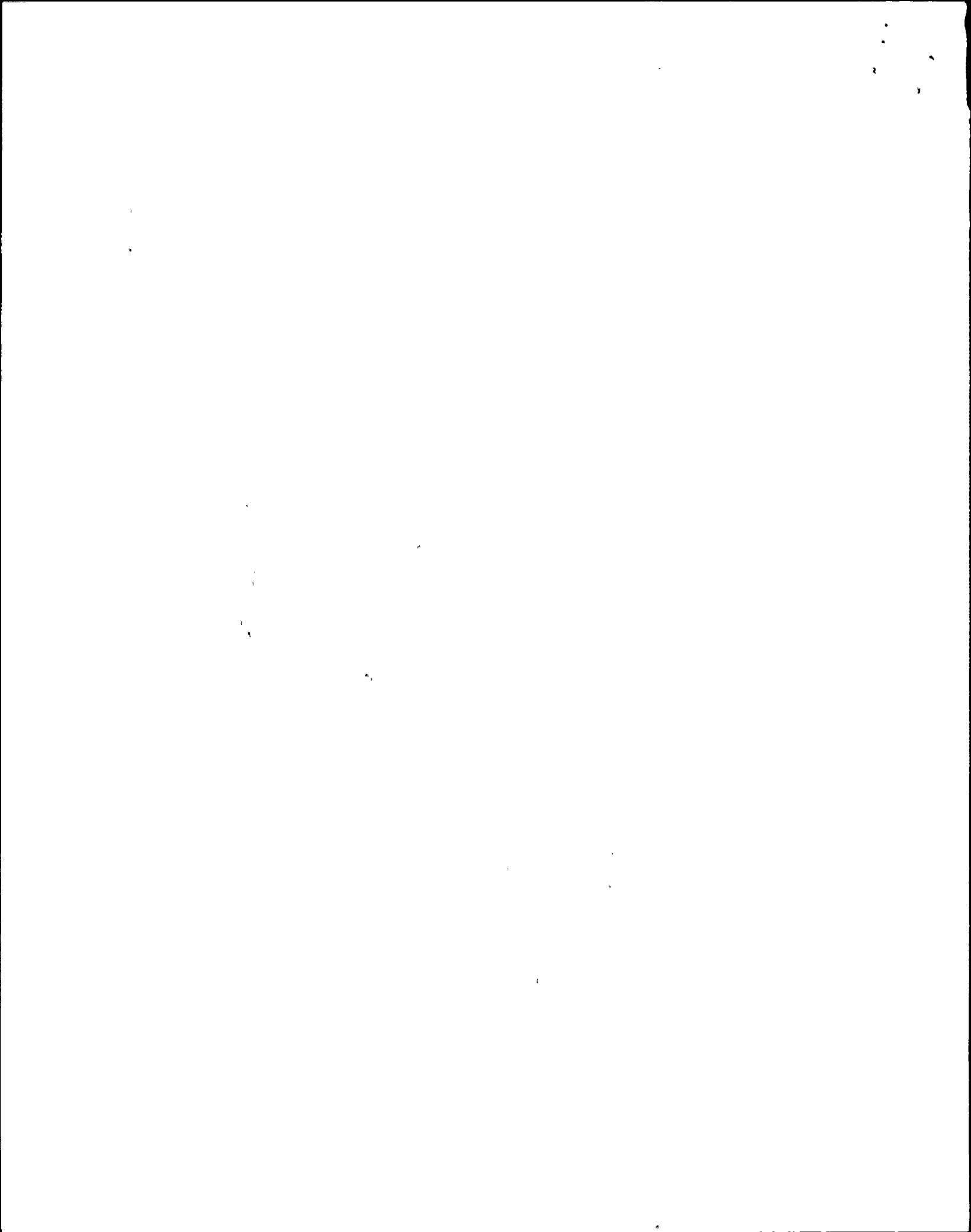
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	SIGNED	DATE	



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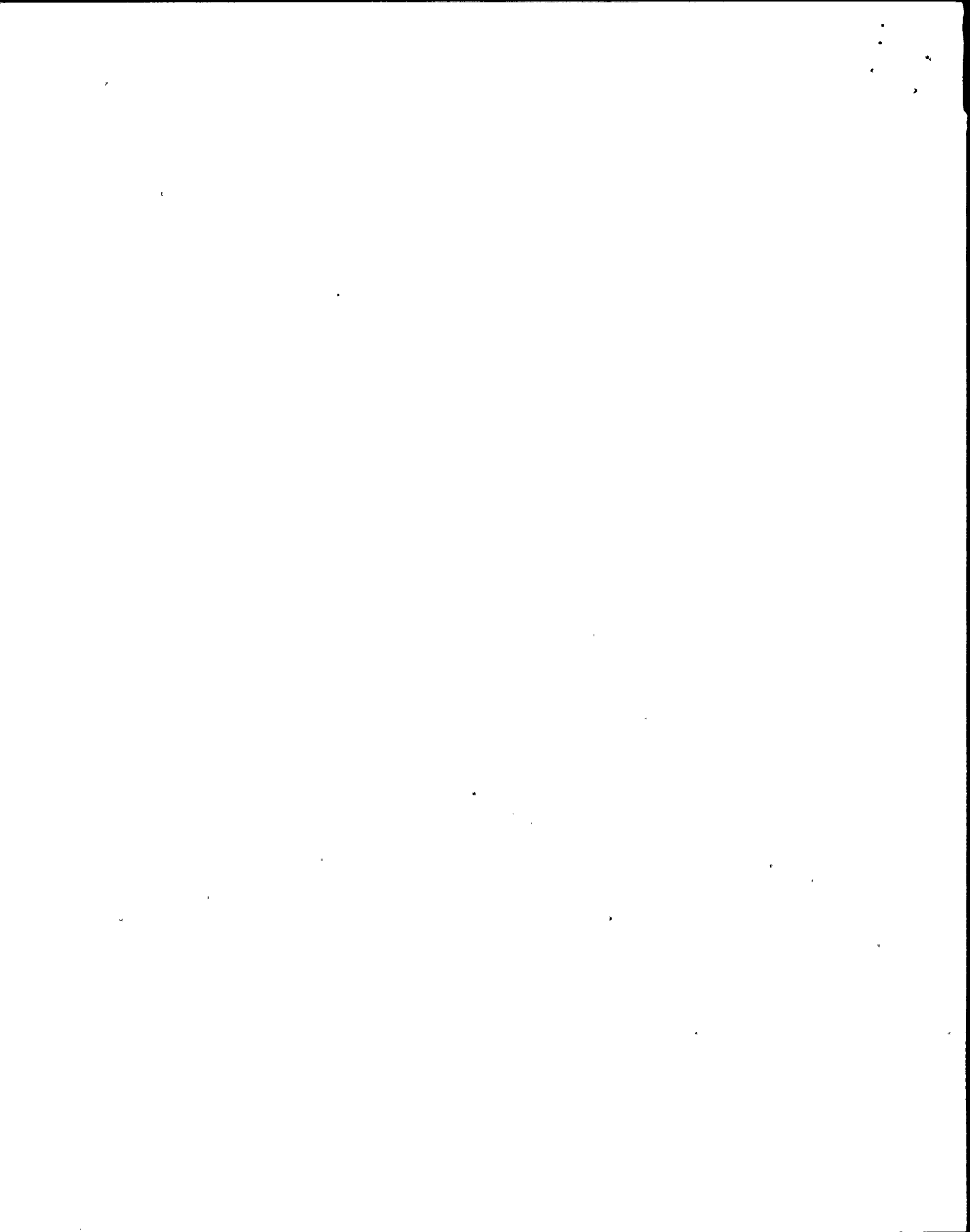


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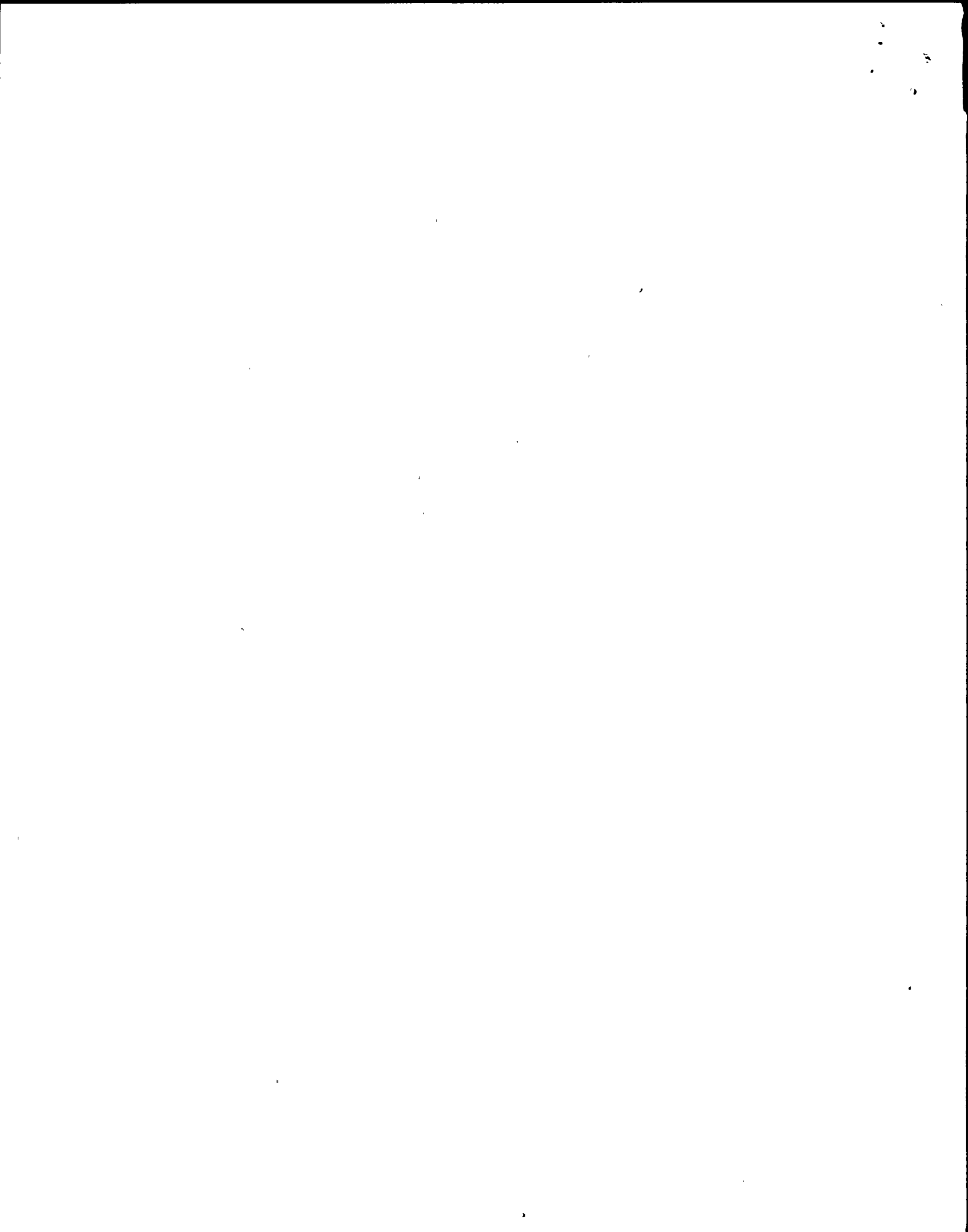
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10.2.2 Temporary Change - Made Permanent

For Temporary Change Notices identified as "IN EFFECT UNTIL NEXT REVISION", immediately following approval by the General Superintendent or Designee, a copy of the TEMPORARY CHANGE NOTICE and affected pages shall be attached to front of the Master Copy of the procedure. This ensures that personnel using procedures are in compliance with Technical Specification, since evidence of the action and approval will be provided.

The original of the change with its TEMPORARY CHANGE NOTICE is sent to the procedures typing group for publication and/or inclusion in the procedures historical file. Upon issuance, the marked and approved TEMPORARY CHANGE NOTICE shall be maintained in station historical files, but purged from the Master and Working copies. This action will provide a feedback mechanism for temporary changes.

10.2.3 Non-Compliance of Temporary Change

If the independent reviewers and/or the General Superintendent or designee determines that the temporary change is not in compliance with Technical Specifications, refer to AP-10.2.2 for reporting requirements.

10.2.4 Use of the TEMPORARY CHANGE NOTICE for jumpers is not covered by this procedure, but is provided for in AP-3.3.2. When so used, the TEMPORARY CHANGE NOTICE shall be processed in the same manner as provided for changes to procedures, except that a copy of the TEMPORARY CHANGE NOTICE is attached to the jumper/block log instead of the Master Copy and Working Copy.

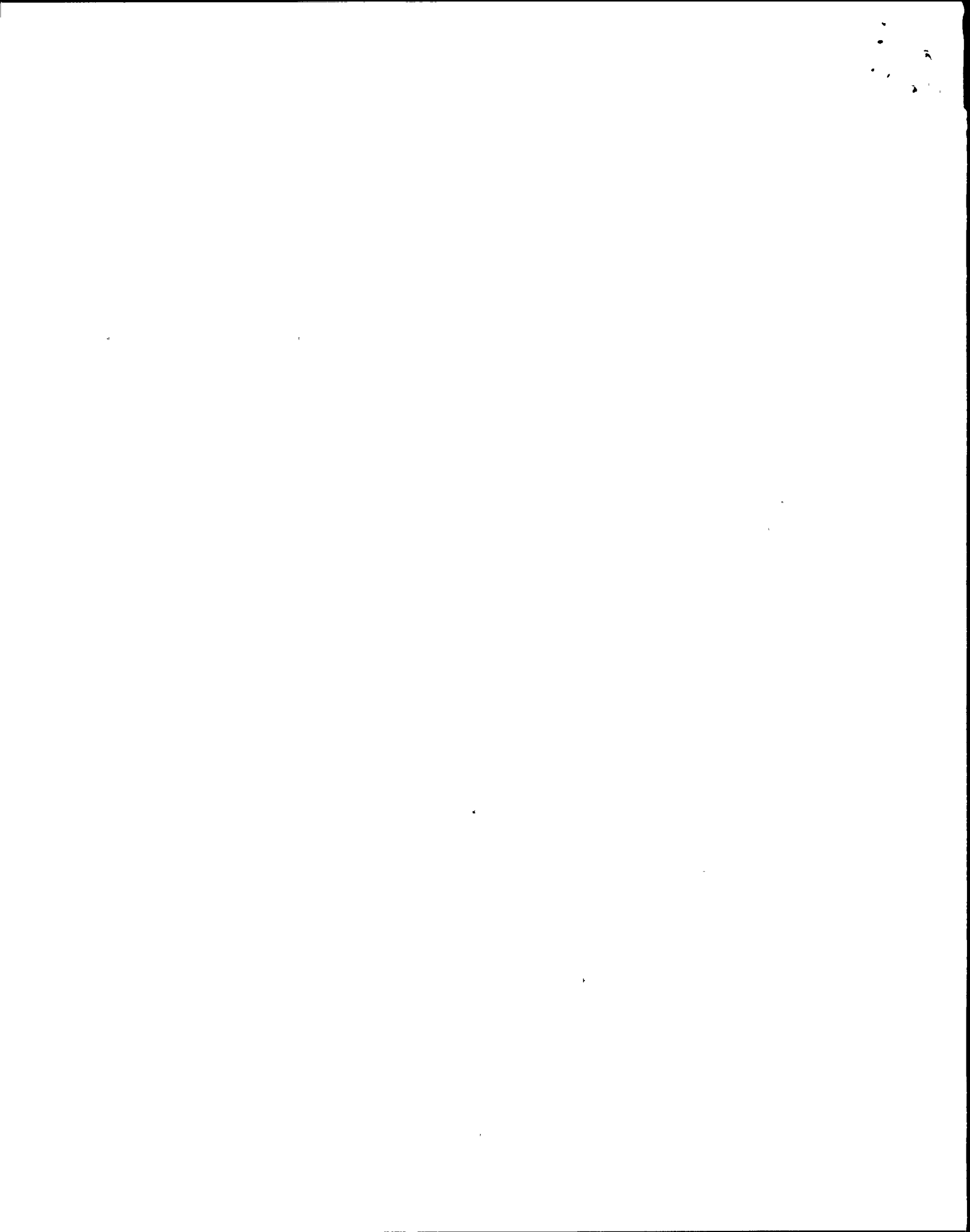
11.0 PUBLICATION AND MAINTENANCE OF PROCEDURES

11.1 Publication Format

11.1.1 Title Page

Every procedure, instruction, or order shall have a title page which shall contain the following information:

1. The name of the company, Niagara Mohawk Power Corporation.
2. The name of the station and unit as: Nine Mile Point Nuclear Station Unit No. 1 or just: Nine Mile Point Nuclear Station, if generally applicable to all units on the site.
3. Procedure Type from Fig. 2.0-1.



C 11.1 (Cont.d)

4. The number and title of the procedure, instruction, or order.
5. A tabulation listing the names and titles of all persons approving the procedure with provision for entering signatures.
6. Approval of a revision as indicated by date and initial under the revision number of a previously signed title page.
7. The following statement should be included on each procedure cover sheet:

THIS PROCEDURE NOT TO BE
USED AFTER (Date)
SUBJECT TO PERIODIC REVIEW

Each time a new document or revision is issued, a tabulation should be provided listing all the pages and dates. This is so that the holder will know that he has all of the correct sheets applicable to the edition approved on the cover sheet. A suggested model cover sheet is attached to this procedure. (Figure 2.0-2)

11.1.2 Revisions and Changes

Revisions shall be published on revised pages or incorporated in a completely reprinted edition and shall be subject to the same rules for the production, review, concurrence, publication, and distribution as the original procedure.

11.1.3 Page Identification

A page number, procedure number, and date of issue shall be printed on each procedure page. Whenever the content of a given numbered page is changed for any reason, such as revision or the repositioning of the text or a set of pages due to retyping, a new date of publication shall be shown. The latest revision in the text is delineated by a vertical line in the margin marked with the revision number or an (*) in the case of a section 11.5 change. When an entire procedure page or procedure is completely revised as noted on the title page, a margin line delineating the change is not required. A suggested model page format is included with this procedure. (Figure 2.0-3)

11.2 Index and Numbering of Procedures

- 11.2.1 Lists of all procedures, instructions, or orders called for in Administrative Procedures shall be maintained under the control of the Supervisor Administrative Services. These lists shall contain the procedure or standing order number, title, revision number, and revision date for each document. The office lists shall be maintained current, and when changes have been made, revised indexes should be published at least quarterly. A log of Temporary Change Notices is maintained per OI-7.

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