NIAGARA MOHAWK

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

April 12, 1982

Office of Inspection and Enforcement
Region I
Attention: Mr. R.W. Starostecki, Director
Division of Resident and Project Inspection
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

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

Dear Mr. Starostecki:

Your Inspection Report No. 50-410/82-01 dated March 11, 1982, identified two apparent violations resulting from an inspection conducted at the Nine Mile Point Unit 2 construction site. Niagara Mohawk's response to these items is attached.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

Gerald K. Rhode
Vice President
System Project Management

PM:bd

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STATE OF NEW YORK )
) ss:
COUNTY OF ONONDAGA )

GERALD K. RHODE, being duly sworn says:

I am Vice President, System Project Management of Niagara Mohawk Power Corporation. I have read the foregoing letter and attachment, and the information contained in the letter and attachment is true to the best of my knowledge, information and belief.

Gerald K. Rhode

Sworn to me before on
this 12th day of April, 1982

Hazel J. Carrick
Notary Public

HAZEL J. CARRICK
Notary Public in the State of New York
Qualified in Onon. Co. No. 4524460
My Commission Expires March 30, 1984

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT UNIT 2
DOCKET NO. 50-410

Response to Notice of Violations Attached
to NRC Inspection Report No. 82-01
dated March 11, 1982

Two apparent violations were identified in Inspection Report No. 82-01. The first apparent violation was reported as follows:

A. 10CFR50, Appendix B, Criterion II, states in part, "The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained".

ITT Grinnel Quality Assurance Manual states in part in Personnel Indoctrination and Training Procedure QCF-1.5, Section C, dated April 2, 1980, "The Field Quality Control Manager in conjunction with the specific department supervisor shall instruct in formal training sessions for quality control, supervisory, engineering, purchasing and other key staff personnel in the quality system requirements. In addition, training for proficiency in their respective activities shall be conducted by the department supervisor. Records of these formal training sessions shall be maintained on the Training Report form F1.5A and filed by the Field Quality Control Manager".

Contrary to the above, a training program had not been established by either the ITT Grinnel Field Quality Control Manager or the department supervisor to assure that engineering personnel were proficient in their respective activities concerning pipe whip restraint supports.

This is a Severity Level V Violation (Supplement II).

The following is provided in response to this item of nonconformance:

ITT Grinnel has developed a training program for their Engineering personnel involved in pipe whip restraint activities to increase their proficiency. Implementation of this training program will be completed by April 16, 1982.

Newly hired personnel, in both Quality Control and Engineering, who will be working in the pipe wipe restraint area will also receive this documented specialized proficiency training.

The second apparent violation was reported as follows:

B. 10CFR50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by document instructions, procedures...and shall be accomplished in accordance with these instructions, procedures or drawings".

The Nine Mile Point Nuclear Station - Unit 2 PSAR, Appendix D, adopts the SWEC Quality Assurance Program which provides quality assurance throughout the designated phases of the project, including installation specifications.

Specification No. P301X, Installation of Pipe Rupture Restraint and Restraint Structures states in Procedure CP-3 dated January 13, 1982, paragraph 4.2.2, "The primary control of pre-heat shall be with calibrated thermocouples or pyrometers. A minimum of one thermocouple or contact pyrometer shall be placed on each weld area as defined in 4.3 (at about midlength of the weld)".

Specification No. S204X, Erection of Structural and Miscellaneous Steel Category I, Revision 2, dated June 27, 1981, states in part, "The primary source of preheat control shall be calibrated contact pyrometers or thermocouples".

Contrary to the above:

a. Whip restraint structural welds to biological shield wall overlays, FWS-PRS-008-WR 184 and WR 185 did not use thermocouples or pyrometers for preheat control.

b. Structural steel welds greater than 1 inch, FP6, FP11, FP13, RB166, and RB165, did not use thermocouples or pyrometers for preheat control.

c. Overlay to the biological shield wall, 0807, did not use thermocouples or pyrometers for preheat control.

This is a Severity Level V Violation (Supplement II).

The following is provided in response to this item of nonconformance:

It was not intended to perform continuous monitoring of preheat temperatures for welding under Specifications P301X and S204X. Periodic checking is sufficient to assure attainment and maintenance of preheat temperatures. Therefore, the use of tempilsticks to monitor preheat temperatures provides the same level of control as the thermocouples or pyrometers.

Based on the above, on February 10, 1982, an Engineering and Design Coordination Report (E&DCR No. C12,649) was issued to change Specification Nos. S204X and P301X to include the use of tempilsticks as a primary source of heat control.

A review was performed on the weld data reports for items installed to Specification Nos. S204X and P301X, in which tempilsticks were used for preheat control. The welds which utilized this method were reported on N&D Nos. 2948 and 3101. These welds were determined to be acceptable because use of tempilsticks is considered sufficient to assure proper verification of preheat temperatures.

In addition to the above, the adequacy of FQC surveillance of preheating, welding and post heating temperatures is being evaluated by the Niagara Mohawk Quality Assurance Department and will be followed up with your Resident Inspector.