

August 18, 1982

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

RE: Docket No. 50-220
Inspection Report 82-10

Dear Mr. Martin:

This refers to the routine safety inspection conducted by Dr. P.K. Eapen of your office on June 21-25, 1982, at the Nine Mile Point Nuclear Station Unit #1 and at our Corporate Offices of activities authorized by NRC License No. DPR-63 and to the discussions of your findings held by Dr. Eapen at the conclusion of the inspection, and to a subsequent telephone discussion between Mr. D.L. Capton of your office and Mr. T.J. Perkins on July 1, 1982.

ITEM A

Technical Specification 6.5.1.6.a in conjunction with Technical Specification 6.8.1 requires the Site Operations Review Committee to review all procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972. Appendix A of Regulatory Guide 1.33, November 1972, includes procedures for the repair and replacement of major equipment.

Contrary to the above, in June, 1982, several procedures (CWI-1399K-1 series) for removal and replacement of recirculation nozzle safe-ends and associated piping were not reviewed by the SORC.

RESPONSE

The safety evaluation and procedures outlining the overall methodology for the Reactor Vessel Recirculation Nozzle Safe-End Replacement were reviewed by the Site Operations Review Committee (SORC) prior to commencement of work. Presently, SORC is reviewing the controlling work procedures pertaining to on-site work in connection with the recirculation system repairs which are the Controlled Work Instructions (CWI's) for work in the plant per NNI Instruction 1399K-SO-20. Changes to approved procedures

ITEM A RESPONSE (continued)

and CWI's are also being reviewed in accordance with Section 6.8 of the Technical Specifications.

Administrative practices and procedures at the site are being revised to assure that all procedures which come within the scope of Technical Specifications 6.5.1.6 and 6.8.1 will be subject to appropriate review.

The Niagara Mohawk Power Corporation Nine Mile Point Nuclear Station is now in full compliance with Technical Specifications 6.5.1.6a and 6.8.1. Changes to Administrative Procedures will be made by August 31, 1982.

SAFE END CUTTING OPERATION

In addition, as requested in Paragraph 5 of your 7/19/82 letter, the following information is provided:

An investigation into the causes of the mislocation of the nozzle cut on #15 recirculation suction nozzle has found the following causes/circumstances:

- a. Newport News Industrial Corporation's Quality Assurance Program required improvement in numerous areas as documented in NMPC QA Non-conformance Report 82-33. As stated in NCR 82-33, the NNI QA Program exercised inadequate control or lack of instruction and/or training in regards to NNI's shop travelers hold points and instructions for construction, technical and QA/QC personnel.
- b. The actual shim block that was designed to be used in the cutting process was not available for use during mock-up training. A substitute shim block was used. This fact introduced a factor of unfamiliarity on the first cutting evolution in the drywell.
- c. The cutting machine drive air motor used in the mock-up training was a different model and, therefore, size than the air motor used on the nozzle cut. This caused a work stoppage in the drywell because the cutting tool would not clear the air motor as it travelled around the machine. This work stoppage occurred before the cutting tool touched the nozzle/safe-end material.
- d. The procedure did not have adequate controls on the reverification of cutting tool alignment after the tool had been relocated or removed. It was assumed that the only time the tool would be removed from the machine was after it had commenced pipe penetration. No credit was given for changing worn or damaged tool bits, operational problems or equipment problems.

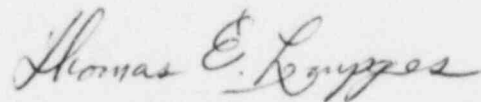
Niagara Mohawk Power Corporation has taken the following corrective actions:

- a. NMPC QA has taken measures to ensure that the NNI QA/QC program has been upgraded to the appropriate level of quality. This is evidenced by the following improvements in the NNI program:
 1. NNI developed supplemental training programs to include all craft, craft foremen, and NNI personnel on site. This training includes CWI sign-offs/hold points, tagging requirements, and purpose of CWI's.

SAFE END CUTTING OPERATION (continued)

2. An increase in NNI QC inspector participation in all work in the drywell.
 3. A construction supervisor or field engineer is providing 24 hour coverage of drywell operations and also briefing and debriefing craft personnel.
- b. The cutting procedures have been revised to ensure that the location and the operation of the cutting equipment is maintained at the required quality level. To ensure this, the following steps have been added:
1. A log is maintained to document all shims installed and removed from the cutting machine.
 2. Whenever the cutting operation cannot be performed in accordance with the control required by the controlling document, the cutting operation shall be stopped immediately.
 3. Whenever the cutting tools are removed from the machine, or the machine set-up is adjusted, the Construction Supervisors shall record the event in the log, notify NMPC, reverify, and have QA/QC reverify that the tool has been replaced in the proper cut location.

Very truly yours,



Thomas E. Lempges
Vice President -
Nuclear Generation