

U.S. NUCLEAR REGULATORY COMMISSION

Region I

Report No. 82-11
Docket No. 50-410
License No. CPPR-112 Priority -- Category A

Licensee: Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Facility Name: Nine Mile Point, Unit 2

Inspection at: Scriba, New York

Inspection conducted: August 30, 1982 to September 30, 1982

Inspectors: R. D. Schulz 10-13-82
R. D. Schulz, Resident Inspector date signed
A. E. Finkel for 10/14/82
A. E. Finkel, Reactor Inspector date signed

Approved by: H. B. Kister 10/14/82
H. B. Kister, Chief, Reactor Projects date signed
Section 1C

Inspection Summary:

Inspection on August 30, 1982 to September 30, 1982 (Inspection Report No. 50-410/82-11)

Areas Inspected: Routine inspection by the resident inspector of work activities relative to mechanical equipment, safety related piping, diesel generator building, instrumentation, pipe restraint structures, weld rod control, piping welder qualification, and pipe supports. The inspector also performed plant inspection tours and reviewed licensee action on previously identified items. The inspection involved 120 inspector hours.

Results: Two violations were identified: Activities were not prescribed by documented instructions (paragraph 2), and Failure to provide control of weld rod storage and correct nonconforming conditions (paragraph 10).

Areas Inspected: Unannounced inspection on September 22-24, 1982 of installed raceways, implementation of quality assurance plans, and instructions and procedures associated with raceway installations. (Report sections 13 and 14) The inspection involved 20 hours on site by one NRC region based inspector.

Results: No violations were identified.

DETAILS

1. Persons Contacted

Niagara Mohawk Power Corporation

W. D. Baker, Construction
J. L. Dillon, Q. A. Engineer, Site Lead
M. S. Dunlop, Q. A. Technician
L. G. Fenton, Senior Q. A. Technician
J. B. Hadden, Asst. Manager, Construction
E. Manning, Q. A. Technician
S. F. Manno, Project Manager, Unit 2
F. J. Osypiewski, Q. A. Engineer
J. P. Ptak, Manager of Construction, Site
G. Rhode, Senior Vice President, System Project Management
J. Swenszkowski, Q. A. Technician

Stone & Webster Engineering Corporation

L. W. Brown, Superintendent of Construction
S. Brown, Trainee
C. M. Corso, Electrical Engineer
S. W. Crowe, Assistant Superintendent Field Q. C.
T. Dean, Q. C. Inspector
D. Foley, Trainee
G. Gigon, Level II Inspector
D. Gibson, Senior Engineer
R. Hardison, Q. C. Engineer
K. Herbert, Trainee
K. Irwin, Level II Inspector
R. Kelvin, Senior Q. C. Engineer
D. W. Lanham, Senior Q. C. Engineer
M. LaPoint, Trainee
E. A. Magilley, Assistant Superintendent Field Q. C.
R. Nagel, Quality Data Supervisor
G. W. Pierce, Q. A. Site Supervisor
G. Smith, Level II Inspector
J. C. Thompson, Superintendent of Field Q. C.
P. Towle, Trainee
S. West, Trainee
G. Wilkins, Level II Inspector

Reactor Controls, Inc.

J. Kelley, Q. C. Supervisor
B. Kienlen, Q. C. Inspector
T. O'Neil, Installation Supervisor
L. M. Smith, Assistant Q. C. Supervisor

Johnson Controls, Inc.

M. Brenner, Q. A. Manager
 W. Dunn, Project Manager
 B. Furlong, Construction Manager

ITT Grinnell Industrial Piping, Inc.

R. Bennage, Q. C. Inspector
 O. Ciolko, Engineer
 J. Collins, Q. C. Inspector
 G. DeRouse, Q. C. Inspector
 D. R. Giguere, Q. C. Manager
 D. L. Grodi, Inspection Supervisor
 J. Mageski, Receiving Supervisor
 G. McDonough, Senior Office Engineer
 K. Miller, Q. C. Inspector
 J. Padgett, Welding Supervisor
 L. Pela, Technical Supervisor
 M. E. Poissant, Q. C. Engineer
 K. Tiss, Engineer
 J. White, Project Manager

2. Plant Tours

The inspector observed work activities in-progress, completed work and plant status in several areas during general inspections of the plant. Particular note was taken of the presence of quality control inspectors and quality control evidence such as inspection records, material identification, nonconforming material identification, housekeeping and equipment preservation. The inspector interviewed craft personnel, supervision, and quality inspection personnel as such personnel were available in the work areas.

Specifically, the inspector observed installation of various spent fuel pool, piping spool pieces at elevation 350', adjacent to the fuel pool liners. The inspector noticed that ITT Grinnell field personnel cut 5/8 of an inch off 6" spent fuel pool, spool piece NM-7-270X, including a beveled end. Subsequently, it was learned as a result of discussions with field personnel and from a review of the field planner, that the cut was made without authorization documented in the field planner or instructions for the cut and re-bevel. This is contrary to ITT Grinnell Industrial Piping, Inc. Quality Assurance Manual which states in part in Section 4, Process Control, that the field engineer shall describe the work to be performed in the field planner and if a change or revision is required, the change or revision will be described in the original planner. As a result, ITT Grinnell quality control personnel were unaware of the cut and measures were not established for quality control to verify that a liquid penetrant test would be performed on the cut end or that a revision would be made to the ASME Boiler and Pressure Vessel

Code, Class 3, NPP-1 Code Data Report. This is a violation of 10 CFR 50, Appendix B, Criterion V. Activities were not prescribed by documented instructions. (410/82-11-01)

3. Licensee Action on Previous Inspection Findings

- a. (Closed) UNRESOLVED (82-01-01): The Stone & Webster Specification and ITT Grinnell Procedure have been revised to include requirements for verification of important installed whip restraint dimensions. In addition, the form being used for documenting nonpressure welds has been included in ITT Grinnell's procedure.
- b. (Closed) UNRESOLVED (82-02-01): The Stone & Webster Specification has been revised to clarify contractor's requirements when using temporary pipe supports. ITT Grinnell has instituted a training course for supervisory personnel of the acceptable span between temporary pipe supports. When temporary pipe supports are removed, the ITT Grinnell Construction Field Engineer will be notified, prior to removal, that the additional spanning is adequate.

4. Licensee Action on Construction Deficiency Reports (CDR's)

Final reports have been issued by the licensee on the following CDR's which will be closed out when corrective action measures have been fully implemented and verified by the resident inspector:

- a. 82-00-02 The deficiency concerned the emergency standby diesel generator sets. The licensee issued a final report on March 4, 1982.
- b. 82-00-03 The deficiency concerned Series 20K switches manufactured by Electroswitch. The licensee issued a final report on March 4, 1982.

The following CDR is considered closed:

- c. 82-00-04 The deficiency concerned the Agastat E-7000 Series time-delay relays. General Electric, Switchgear Division, Burlington, Iowa has returned the affected relays to the manufacturer. The manufacturer has corrected the problem and returned the relays to General Electric.

5. Mechanical Equipment

a. Procedures

The inspector reviewed ITT Grinnell mechanical equipment procedures to ascertain that erection and inspection procedures were in accordance with regulatory requirements and installation specification NMP2-P275C including Addendum 3, dated August 17, 1981. This review included:

- (1) Field Quality Control Procedure FQCX 4.2-20-8, Inspection, Surveillance, and Documentation of Mechanical Equipment Itemized In Specification NMP2-P275C, dated February 4, 1982.
- (2) Field Quality Control Procedure FQCX 4.2-22-6, Erection and Installation of Mechanical Equipment.
- (3) ITT Grinnell Quality Assurance Manual QCF-4.1, Process Control, dated July 13, 1981.

The inspector noted that ITT Grinnell Form No. 4.2-20, Mechanical Equipment Checklist, appeared to need revision for the purpose of standardizing the inspection attributes that require the use of a calibrated tool or gauge. ITT Grinnell has decided to revise form no. 4.2-20 to incorporate specific instructions with regard to the application of calibrated tools or gauges. This is an open item which will be examined in a future inspection period. (410/82-11-02)

b. Observation of Work and Records

The inspector checked the in-place condition of the following pieces of equipment:

- (1) CRD Drive Water Pump and Motor, 2RDS-P1A.
- (2) CRD Drive Water Pump and Motor, 2RDS-P1B.
- (3) Residual Heat Removal Heat Exchanger, 2RHS-E1B.
- (4) Recirculation Motor-Generator Set, 2RCS-MG1A.
- (5) Recirculation Motor-Generator Set, 2RCS-MG1B.
- (6) Standby Diesel Generator Fuel Tank, 2EFG-TK2.

Documentation reviews included quality control verification of mechanical equipment release, pre-installation checks, foundation acceptability, initial setting requirements, and initial alignment tolerances.

The inspector discovered that quality control installation documentation on various pieces of equipment did not include a record of the use of calibrated tools or gauges for such activities as initial setting level and plumbness, location and parallelism of the main piping connections, or initial coupling and shaft alignment. ITT Grinnell has decided to review the documentation on all safety-related equipment that has been initially set and determine through field records, engineering records, or additional quality control records if calibrated tools or gauges were documented as to use for specific equipment applications. If adequate

documentation is not available, ITT Grinnell stated that measurements would be re-taken with appropriate calibrated tools or gauges. This is an unresolved issue and will be examined in a future inspection period. (410/82-11-03)

No violations were identified.

6. Safety Related Piping

a. Procedures

The inspector reviewed Reactor Controls, Inc. program for installation of reactor recirculation piping. The following procedures were reviewed:

- (1) General Electric Installation Instruction for GE Piping Systems, 22A6792, Revision 1.
- (2) Reactor Controls, Inc. General Welding Specification, GWS-1-01, Revision 5.
- (3) Reactor Controls, Inc. Welding Procedure Specification W-8/8-3, Revision 2

The written program was in accordance with regulatory requirements and specification NMP2-P301V, Design, Fabrication, and Erection of the CRD Hydraulic System, Erection of the Recirculation System and Installation of the Reactor Pressure Vessel Internals ASME Code, Section III Division 1, Class 2, Addendum 1, May 20, 1980.

b. Observation of Work and Records

The inspector examined the final welds joining a 24", 1.153 minimum wall, SA-358 GR. 316 pipe, to the recirculation pump discharge nozzle, in loop A and loop B. Weld data sheets were checked to verify quality control acceptance of pre-weld cleanliness, purging, preheat and interpass temperature, liquid penetrant test of the root and final weld, radiograph of the final weld, and visual examination.

The following reactor recirculation drawings were reviewed for conformance to specification and configuration details:

- R.C.I. drawing NMP-100, Revision 0, Sheet 1 and Sheet 2, loops A and B respectively.
- G.E. drawing 767E286, Revision 12.

Reactor Controls, Inc. isometric drawing NMP-100, Revision 0, sheets 1 and 2, were not approved by engineering but were being used by Reactor Controls, Inc. quality control and field personnel. Drawing NMP-100, Revision 0 was only signed by a draftsman.

Upon further investigation, the inspector discovered that Specification NMP2-P301V requires Reactor Controls, Inc. to produce isometric drawings that will be used as the controlling drawings for field erection and for fabrication. The inspector addressed this drawing control deficiency to Niagara Mohawk quality assurance personnel on September 1, 1982 and was informed that this problem was identified by Stone & Webster auditors in August. According to Niagara Mohawk quality assurance personnel, measures were being formulated for prompt corrective action.

On September 2, 1982, the licensee informed the inspector that Drawing NMP-100, Revision 0 would be approved by September 3, 1982 and that Specification NMP2-P301V would be revised to eliminate the requirement that Reactor Controls, Inc. produce isometrics as the controlling drawings for field fabrication and erection. Instead of the Reactor Controls, Inc. isometrics being the controlling drawings, General Electric furnished drawings take precedence. The licensee also stated that General Electric approved drawings would be distributed in the field. On September 3, 1982, the inspector verified that drawing NMP-100, sheets 1 and 2, had been approved by engineering.

This is an unresolved issue and full implementation will be examined in the next inspection period. (410/82-11-04)

NPP-1 Code Data Reports were examined and nameplate identification was verified on the 24" spool piece. Issuance and return of weld rod was controlled in accordance with GWS-1-01, General Welding Specification. Material certifications for filler wire, weld rod, and consumable inserts were in accordance with ASME Boiler and Pressure Vessel Code, Section III and Section II, Part C. The inspector did discover that the Schaeffler diagram for the consumable inserts used in recirculation welds 5A and 6B had been plotted incorrectly, showing a 7.5% ferrite reading. The inspector performed the calculations and verified that the ferrite meets the acceptance criteria of 8% minimum, with an actual 9% ferrite. Reactor Controls, Inc. Quality Control Management stated that the Schaeffler diagram calculations would be re-plotted.

No violations were identified.

7. Diesel Generator Building

Concrete placement including foundation and substructure construction was observed for the diesel generator building. Activities and inspection records were in accordance with regulatory requirements and installation specifications. The following records were examined:

- a. Preplacement - cleanliness, foundations, construction joints, formwork, and reinforcing

- b. *Placement - conveying equipment, vertical drop, rate of placement, consolidation, and vibrator frequency
- c. Curing - surface, protection, heating, and duration
- d. Bedrock Surface - Geotechnical engineers mapped, photographed, and inspected the bedrock surface to the satisfaction of a geologist and found the area acceptable.

*Including fill, wall, footings, and tank encasement.

No violations were identified.

8. Instrumentation

Johnson Controls, Inc. is the contractor responsible for instrument installation and is mobilized on-site developing construction and quality assurance procedures. The following Johnson Controls, Inc. documents were included in the inspector's review for compliance with applicable licensee and regulatory requirements:

- a. Quality Assurance Manual, Revision 1, dated August 6, 1982 including Addenda.
- b. Procedure No. QAS-201-NMP2, Revision 0, dated July 15, 1982, Indoctrination and Training of Personnel Performing Activities Affecting Quality.
- c. Procedure No. QAS-203-NMP2, Revision 2, dated August 25, 1982, Training and Qualification of QA/QC Inspection and Testing Personnel.
- d. Procedure No. QAS-601-NMP2, Revision 0, dated September 1, 1982, I/F Planner Package Preparation and Revision Procedure.
- e. Procedure No. QAS-902-NMP2, Revision 3, dated August 28, 1982, Identification and Control of Material.
- f. Procedure No. QAS-1004-NMP2, Revision 0, dated July 28, 1982, Fitup and Marking Procedure.
- g. Procedure No. QAS-1102-NMP2, Revision 0, dated August 6, 1982, Inspection Stamps.
- h. Procedure No. QAS-1301-NMP2, Revision 2, dated August 28, 1982, Calibration Control of Measurement and Test Equipment.
- i. Procedure No. QAS-1501-NMP2, Revision 1, dated August 27, 1982, Status Tag Usage.
- j. Procedure No. QAS-1701-NMP2, Revision 0, dated September 2, 1982, Corrective Action Request.

- k. Procedure No. SP-1002-NMP2, Revision 0, dated July 27, 1982, Qualification Procedure for Bending of Small Bore Pipe and Tubing.
- l. Procedure No. SP-2001-NMP2, Revision 2, dated September 3, 1982, Installation of Drill-In Anchor Bolt Procedure.

The inspector requested the licensee to address the following areas:

- Section No. 4 of the Quality Assurance Manual establishes responsibilities and duties for the Project Manager including engineering review of owner furnished drawings, in-house drawing reviews for conformance to design drawings and design specifications, and revised drawing review for design errors and design/engineering calculations. These responsibilities and duties are normally assigned to a professional engineer. Johnson Controls, Inc. job description, 61-401, does not have a mandatory requirement that the Project Manager be a professional engineer or have an engineering degree. It also does not include a qualification for nuclear experience. Based on the responsibilities and duties prescribed for the Project Manager, programmatic qualifications do not appear to be adequate. The present Project Manager for Johnson Controls, Inc. is a professional engineer with nuclear experience.
- Control of measuring and test equipment procedures do not appear to be adequate as they do not address control of calibrated equipment between calibration intervals with regard to personnel issuance and storage. This aspect is important due to the lengthy calibration intervals established in QAS-1301-NMP2.
- The drilled-in concrete anchor bolt procedure, SP-2001-NMP2 is in accordance with site specification S203G. Stone & Webster Installation Specification S203G was determined to be deficient in NRC inspection report 82-10 with regard to the inspection and test program. Therefore, the anchor bolt inspection procedure SP-2001-NMP2 requires revision for conformance to regulatory requirements. (Reference NRC Inspection Report 82-10, Section 7)

Since these procedures may need to be referred to Stone & Webster Engineering Corporation's home office for response and coordinated with Johnson Controls, Inc., the inspector has given the licensee time to formulate answers and/or revise the procedures. These unresolved issues will be reviewed in a future inspection period. (410/82-11-05)

No violations were identified.

9. Pipe Restraint Structures

The inspector conducted visual inspections of ITT Grinnell completed welds and in-process welds for pipe restraint structures attached to biological shield wall overlays. Welding was in accordance with approved drawings. Actual welding conditions and conduct, the sequence of operations,

temperature controls, and weld rod control were all checked for conformance with Specification NMP2-P301X, Installation of Pipe Rupture Restraints and Restraint Structures, Revision 1, dated February 3, 1982.

Numerous records were examined including:

- Weld rod requisitions
- Based material test reports
- Welding material test reports
- Weld data reports
- Preheat and post-heat reports

For attachments to the biological shield wall a continuous preheat of 225°F minimum must be applied for one hour prior to welding, and a post-heating temperature of 225°F must be applied for two hours after the weld area has been completed. Numerous ITT Grinnell preheat and post-heat quality control records appeared deficient for one or more of the following reasons:

- a. Starting times for welding was not documented to assure one hour preheat maintenance.
- b. Post-heat was not documented after weld completion.
- c. Preheat and post-heat records were missing.

Examples of these record deficiencies concern restraint structures MSS-PRS-032, RCS-PRS-043, RCS-PRS-021, and RCS-PRS-040.

ITT Grinnell is in the process of reviewing the documentation on all pipe restraint structures to determine if quality control records with the addition of field records, will verify preheat and post-heat maintenance. Pending the ITT Grinnell review, this item will remain unresolved and will be examined in a future inspection period.
(410/82-11-06)

No violations were identified.

10. Weld Rod Control

The inspector reviewed both ITT Grinnell's and Stone & Webster's quality assurance programs for weld rod control. Stone & Webster Engineering Corporation (Site) Specification NMP2-7201, Field Storage, Handling, and Issuance of Welding and Brazing Materials, Revision 1, states in part, "Storage ovens which contain mild steel or low alloy steel covered electrodes shall be maintained at 300°F ± 50°F. All other covered electrodes shall be stored at 200°F ± 50°F." ITT Grinnell's program, which was reviewed and approved by Stone & Webster Engineering Corporation, required that each storage oven have a permanently affixed calibrated

thermometer and that each oven be calibrated every three months.

10 CFR 50, Appendix B, Criterion II states in part that the quality assurance program shall provide control over activities which shall be accomplished under suitably controlled conditions, and shall provide assurance that all the prerequisites for the given activity have been satisfied.

Stone & Webster's quality assurance program does not provide control of electrode storage in accordance with temperature prerequisites that assure acceptable weld quality and furthermore, failed to identify and correct improper storage when documented in an inspection report. The quality assurance program's lack of control was evidenced by the following details:

- (1) Calibrated thermometers are not required to be attached to the rod ovens to assure temperature maintenance.
- (2) The rod ovens do not require periodic calibration to assure accurate thermostat control.
- (3) The quality assurance program requires only monitoring the ovens once during the month, which does not assure temperature maintenance.
- (4) Quality control had no documented evidence that the E308-16 electrodes, in oven #4, were stored at acceptable temperatures from April 7, 1982 to June 17, 1982.
- (5) The inspector discovered through a quality control record review that on May 18, 1982, rod oven #4 violated the specification temperature parameters of NMP2-7201 for E308-16, 1/8" electrodes. The electrodes were neither identified as being nonconforming nor was corrective action taken. The E308-16 was documented on May 18, 1982 as being stored at 148°F and accepted by the quality control inspector. This record represented the sole monthly temperature documentation. A nonconformance report was written after the resident inspector identified the temperature deviation.

The inspector contacted the manufacturer of the E308-16 electrodes (Sandvik). Their recommended storage temperature for E308-16 electrodes is 250°F ± 25°F. The difference between the manufacturer recommendation and the Stone & Webster Specification NMP2-7201 was referred to Niagara Mohawk for resolution.

The electrodes stored in oven #4 were used on the Spent Fuel Storage Pool Liner.

The inadequate control of rod oven temperatures noted above is considered a violation of 10 CFR 50, Appendix B, Criterion III, and failure to identify and correct a nonconforming condition is a violation of 10 CFR 50, Appendix B, Criterion XVI. (410/82-11-07)

11. Piping Welder Qualification

The inspector examined Reactor Controls, Inc. Welder Qualification Records to verify compliance with ASME Boiler and Pressure Vessel Code, Section IX, Article III, Welding Performance Qualifications. The records were reviewed for compliance to the applicable sections of Article III, Section IX, as detailed below:

- QW-452, Performance Qualification Specimens
- QW-462, Test Specimens
- QW-350, Welding Variables
- QW-304, Welders - Radiography
- QW-303, Limits of Qualified Positions

In addition, the inspector compared the welders qualifications against recirculation piping weld data report records to verify that joints welded were in accordance with welder qualification tests.

No violations were identified.

12. Pipe Supports

The inspector reviewed the ITT Grinnell pipe support program to ascertain whether the installation of safety-related pipe supports were in compliance with NRC requirements, licensee specifications, contractor procedures, and ASME Section III, NF, of the ASME Boiler and Pressure Vessel Code. The inspector reviewed the pipe support program for the following attributes:

- (1) Drawing control
- (2) Welding
- (3) Offset and tolerance gaps
- (4) Configuration
- (5) Traceability of pressure boundary attachments

The following supports were examined for these five attributes:

<u>Support</u>	<u>Drawing</u>	<u>Size of Pipe Line</u>
2SWP-PSR736A3	12177-BZ-111BG-1	30"
2SWP-PSR693A3	12177-BZ-111BG-1	30"
2SWP-PSR748A3	12177-BZ-111S-1	30"
2SWP-PSR705A3	12177-BZ-111S-1	30"

<u>Support</u>	<u>Drawing</u>	<u>Size of Pipe Line</u>
2SWP-PSR750A3	12177-BZ-111U-1	30"
2SWP-PSR707A3	12177-BZ-111U-1	30"

The supports were located in the Service Water Tunnels, at elevation 250' 9".

Engineering and Design Coordination Reports were reviewed which affected both configuration, location, and spacing of components. Measures have been established allowing field changes thru Engineering and Design Coordination Reports, which are processed as part of the field planners. ITT Grinnell inspection records were found to be in accordance with specifications requirements.

ITT Grinnell procedure FQC-4.2-14-7, Inspection of Installed Pipe Supports, states in Section IV that quality control inspections are intended to be performed upon the completion of a pipe support installation. Section V of the procedure states that upon completion of support installation, field engineering will sign off the latest approved engineering detail drawing and forward it to field quality control inspection. At the present time, there are approximately 534 installed pipe supports but quality control has only inspected approximately 60 pipe supports. The main reason for quality control only inspecting 60 out of 534 is that field engineering has not signed off the latest approved detail drawing. ITT Grinnell is in the process of revising procedure FQC-4.2-14-7 to allow quality control to inspect installed pipe supports prior to field engineering release. This procedural change and coordination effort with engineering will remain an open item and be examined in a future inspection period. (410/82-11-08)

No violations were identified.

13. Raceway Installations

The inspector inspected the safety-related installed raceways in the Control Building and in the East and West Chase areas. Except as noted on the quality control reject tags attached to the raceways, the raceways were installed in accordance with the drawings and Electrical Installation Specification NMP2-E061A. The installation was inspected by the quality control inspectors in accordance with the requirements of cable tray installation procedure no. N20E061AFA002, Revision 5.

The "C", "K", and "X" cables in the vertical trays will be supported by the use of Kellam metal or Raychem rubber like grips. Engineering and Design Coordination Report (E&DCR) No. CO 1341 lists the various types of cable tray risers using the new Kellam cable grip design. The requirements defined in the E&DCR are not scheduled for installation during this inspection period. The inspector will inspect this E&DCR design

during future inspections.

No violations were identified.

14. Raceway Separation Criteria

The inspector reviewed the electrical specifications, Engineering and Design Coordination Reports (E&DCR's), and drawings that provide raceway installation requirements and inspected raceways as discussed in the above paragraph. The raceway design for separation will be reviewed again when the design requirements of E&DCR No. CO 1341 are incorporated into the system.

The separation criteria discussed in paragraph 5 of NRC Inspection Report 50-410/82-04 will be reviewed for compliance with the design criteria of E&DCR No. CO 1341.

No violations were identified.

15. On September 17, 1982, an allegation was received by NRC Region I relating to the use of personnel without proper certification for inspecting electrical raceway installations. This matter is currently under review by NRC and Niagara Mohawk and will be fully addressed in a later inspection report.

16. Management Meetings

At periodic intervals during the course of this inspection, meetings were held with senior plant management to discuss the scope and findings of this inspection. The licensee acknowledged the inspectors concerns.