

October 14, 1982
(82-572)

Office of Inspection and Enforcement
Region I
Attention: Mr. R. W. Starostecki, Director
Division of Project and Resident Programs
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. 50-410/82-08 dated September 1, 1982 identified an apparent violation resulting from an inspection conducted at the Nine Mile Point - Unit 2 Construction Site. Niagara Mohawk's response is enclosed. This letter is being resubmitted with an Oath of Affirmation that was omitted in the original letter.

Very truly yours,

Niagara Mohawk Power Corporation

Charles V. Mangan

Charles V. Mangan
Vice President
Nuclear Engineering & Licensing

CVM:TL:bjs
Enclosure

xc: Mr. R. D. Schulz, Resident Inspector

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

CHARLES V. MANGAN, being duly sworn says:

I am Vice President-Nuclear Engineering & Licensing 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.

Charles V. Mangan
Charles V. Mangan

Sworn to before me on
this 14th day of October, 1982

Phyllis D. Voytko

Notary Public

PHYLLIS D. VOYTKO

Notary Public in the State of New York
Qualified in Onon. Co. No. 34-9486535
My Commission Expires March 30, 1984

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

Response to Notice of Violation
Attached to NRC Inspection Report
No. 50-410/82-08

The apparent violation was identified as follows:

10CFR50, Appendix B, Criterion IX, states in part, "Measures shall be established to assure that special processes, including welding, ... are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

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

Specification P301C, Field Fabrication and Erection of Piping, Revision 2, May 21, 1981 states in part, "On ASME III piping, where impact testing is required, the weld procedure qualification tests shall include impact testing as required by ASME III."

Contrary to the above, prior to April 8, 1982, welding procedures used for welding four Class I Main Steam piping joints, three Class I Residual Heat Removal piping joints, and authorized for use on ninety-five additional Class I piping joints in the High Pressure Core Spray, Residual Heat Removal, Feedwater, and Main Steam Systems, were not impact test qualified in accordance with Installation Specification P301C for ASME Boiler and Pressure Vessel Code, Section III, Subsection NB, Class I impact tested material.

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

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

Work was stopped on the 102 joints in question on April 13, 1982. The seven weld joints (four Class I Main Steam and three Class I Residual Heat Removal) on which welding has been initiated are being cut out and replaced utilizing appropriately qualified procedures. This work has commenced and will be completed by approximately January 31, 1983.

The work authorization document (Field Planners) for the remaining ninety-five joints which reflected an improper welding procedure were withdrawn from the work area and corrected. Note: Three of these ninety-five welds had tack welds or weld end preparation repairs which have been removed and replaced utilizing an appropriately qualified procedure.

A Special Review Group was established on June 3, 1982, using experienced and qualified Stone & Webster personnel. Category I Field Planners authorized for use through that date were reviewed for correctness and completeness. The review included all work in process and work yet to be entered into production. Documentation for completed work will be reviewed in a timely manner so that early identification and resolution of any past problem area is accomplished. No other instances of incorrect welding procedures being utilized or specified were discovered as a result of this review. Discrepancies which were identified during this review were documented and have been corrected.

To identify the root cause of this problem and to determine if any related problems existed, Stone & Webster, with concurrence and participation by Niagara Mohawk, initiated an extensive review of ITT Grinnell activities. This review consisted of a special program audit of Grinnell from May 3 through 14, 1982, to determine the effectiveness of and the compliance by personnel to the Grinnell Quality Assurance Manual and other supplementary procedures and instructions as they affect the work performed. Stone and Webster also increased the site surveillance activities of Grinnell from May 10 through June 11, 1982. The surveillance effort was conducted to determine the adequacy and competency of Grinnell QA/QC personnel to perform their assigned responsibilities. Additionally, a sample planner review was conducted during May 5 through 7, 1982, to determine the extent and type of planner package deficiencies. The results of these investigations and the corrective actions were presented to the NRC at the July 16, 1982 Management Conference in the Region I office.

All deficiencies found in the above reviews were documented, and corrective action has been completed or scheduled for completion in the near future.

In addition to the specific corrective actions detailed above, the following preventive measures have been initiated to preclude recurrence:

1. Stone and Webster now reviews and concurs with the adequacy of Grinnell engineering and QA/QC instructions of all Category I welding and/or bending Field Planner Packages prior to issuance to construction. As of July 1, 1982, only those Category I welding and/or bending Field Planner Packages that have been reviewed and concurred with by Stone and Webster are released by Grinnell for construction. The results of the Stone and Webster review are being closely monitored. At such time that Stone and Webster and Niagara Mohawk determine that the Field Planner Packages are being consistently and properly prepared, Stone and Webster review and concurrence will be reduced or discontinued as appropriate.
2. Grinnell has modified and strengthened its site engineering organization by upgrading the Category I planner preparation positions, strengthening the Category I planner checking process, and establishing an additional level of review, "verification of code acceptability." In addition, Grinnell has developed a revised training program for its engineering and QC personnel involved in planner preparation and checking.

3. Grinnell senior management has become more involved in site activities, has made changes in corporate QA personnel, has improved coordination between its piping and support groups, and has modified and expanded its site QA/QC organization, including a site QA manager position with substantial oversight responsibilities including continued program evaluation.
4. Stone and Webster has doubled its corporate audits of Grinnell for compliance with QA requirements from 4 to 8 man-weeks annually and has increased the number of QC surveillance staff responsible for Grinnell monitoring from one person to six persons.
5. Grinnell QA and interface procedures are being reviewed by Stone and Webster to ensure that sufficient specification of code detail exists and that the procedures are consistent, complete, and reflect current approved practices.
6. To improve communication further, the number of Stone and Webster and Grinnell management meetings have been increased and meetings are being held regularly.
7. On September 7, 1982, a third Authorized Nuclear Inspector was added by Grinnell for NMP2. The Authorized Nuclear Inspector's primary responsibilities will be in-process inspections and sign-offs.

It is intended that the effectiveness of these measures, both corrective and preventive, will be formally assessed during a November 1982 review. The results will be available for NRC Region I Review as requested in Report No. 50-410/82-08 dated September 1, 1982.