

JUN 21 1984

MEMORANDUM FOR: T. Murley, Regional Administrator, Region I

FROM: R. W. Starostecki, Director,  
Division of Project and Resident Programs

SUBJECT: NINE MILE POINT-UNIT 2 AUGMENTED INSPECTION PROGRAM-PROPOSED

Recent NRC assessments of the Nine Mile Point-Unit 2 (NMP2) site construction status result in several areas of significant concern. The most recent SALP covering the period of October 1, 1982 to September 30, 1983 identified the lack of effective project management by the licensee; weakness in the implementation of quality assurance programs; and deficiencies within the piping/pipe support area related to ITT Grinnell's (ITT) lack of control over field activities. Additionally, the Construction Appraisal Team (CAT) Inspection (50-410/83-18) conducted during the period of November 7 thru December 9, 1983 documents concerns over a broad range of areas indicative of programmatic failures in effective management oversight of contractor and Quality Assurance (QA) activities.

We have developed a proposed Augmented Inspection Program (AIP). This memorandum and the attached tables provide our proposed program for NMP2 over the next one to two years. The program is as follows:

- The AIP, in addition to the Basic Inspection Program (IE MC 2512), consists of:
  - + Frequent meetings with Niagara Mohawk Power Corporation (NMPC) management by various levels of NRC staff and managers to assess the licensee's progress towards completion of commitments.
  - + The use of team and individual inspections to assess the adequacy and effectiveness of the licensee's corrective and ongoing construction actions.
  - + The establishment of milestones by which to monitor NRC implementation of the AIP.
- The responsibilities for AIP implementation and effectiveness are:
  - + Projects Branch 2 will brief the Regional Administrator weekly on NMP 2 status and issues.
  - + The DPRP Section Chief (RPS 2C) is charged with responsibility for overview of the AIP activities.

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- \* A dedicated project engineer will be assigned to RPS 2C in the fourth quarter of FY84 to coordinate inspection efforts and minimize the impact on Region I resources, his expected duties include:

- formulating team inspection plans,

- leading or participating in team inspections,

- responsible for timely reporting of inspection results (draft IR or inputs available prior to teams leaving the site),

- monitoring of AIP implementation and status of site issues.

- The routine onsite inspection effort will be increased by the assignment of a second construction resident inspector.
- Other construction site senior resident inspectors will be detailed to NMP 2 to provide for a short-term increase in on site inspection effort and an objective review of the NMP 2 project status.

The AIP as described assigns actions and responsibilities with proposed schedules for implementation. As the plan progresses, a hard schedule will be developed and distributed to involved parties to provide for timely planning of support. Initial attachments are described below and provide the background necessary to "steer" our inspection effort to identify the areas of concern:

- Attachment 1 provides an Action Plan Outline which briefly identifies the major areas of concern which will be addressed by the AIP.
- Attachment 2 lists existing Region I findings which itemize historical concerns at NMP2 with corollary CAT findings. It is anticipated that this listing will be dynamic and used as a tool to track additional concerns and monitor closeout status.
- Attachment 3 will be developed to provide a table of licensee performance indicators and AIP implementation milestones.

Periodically I intend to re-evaluate the need for an AIP and recommend termination or modification as appropriate. An interim SALP assessment capturing the results of our efforts will be proposed as a tool to measure program effectiveness and licensee performance.

Initiation of the AIP will be documented in a memorandum from the Regional Administrator to Mr. R. C. DeYoung. Specific individual activities will be documented in regular inspection and meeting reports. The proposed plan is subject to revision and will incorporate constructive improvements as they become evident.

As noted in the attachments, project support from the Division of Engineering and Technical Programs (DETP) and other DPRP personnel will be required to supplement our efforts. The plan presently relies almost exclusively on Region I resources, further IE and NR participation may be necessary as the licensee's corrective action commitments develop.

*original signed by*

R. W. Starostecki, Director  
Division of Project and Resident  
Program

Attachments: as noted

- cc w/encl:
- H. Kister
- S. Collins
- R. Gramm
- J. Grant
- T. Martin
- S. Ebnetter
- M. Haughney, NRR LPM

RI: DPRP  
Collins/mlb  
05/17/84  
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RI: DPRP  
Kister  
5/18/84

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6/14/84

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RI: DETP  
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6/20/84

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NMP2 AUGMENTED INSPECTION PLAN

Item No.	Action	Responsibility	First Inspection(I) First Meeting (M) First Review (R)	Frequency	Remarks
1.	Maintain overview and cognizance, monitor implementation of inspection plan	DPRP Section Chief		Continuous	
2.	Dedicated Project Engineer Assigned to PPS2C	Chief PB2/DPRP Section Chief		Once	
3.	Coordinate AIP inspection efforts maintain AIP implementation status	DPRP Section Chief/ NMP 2 Project Engineer		Continuous	Weekly update to Chief PB2
4.	Weekly briefing of site status/issues with RA	Project Branch 2	4/1/(M)	Weekly	
5.	Review response to EA 83-137 NOV and Order	DPRP Section Chief/ NMP 2 Project Engineer		Response due 5/5/84	Add commitments to AIP Review 3rd party assessment report
6.	Review SALP/CAT report, generate list of initial issues	NMP 2 Resident Inspector	by 5/11	Once, update as necessary	Generate OI list, copy to RCPB, amend to IR 83-18
7.	NMPC-Region I Management Meeting: Interim Corrective Action Progress, Integrated Project Network, Performance Monitoring	DPRP Div. Dir.	5/84(M)	Every 4 months	Periodic meeting to monitor NMPC efforts
8.	Attend weekly Protect Status meeting w/Project Manager, Manager QA	Resident Inspector	3/2(M)	Weekly	Update Region on Status via report to Section Chief
9.	Conduct NDE Van Inspection Effort	DETP/EPB	5/84(I)	Once	Verify Extent of RT Problems
10.	Mini-Team Inspections	DPRP/DEIP DPRP Section Chief to attend exits NMP 2 Project Engineer to coordinate inspection plan, implementation, and documentation	4/84(I)	Monthly	2-3 Inspectors and NMP 2 Project Engineer; NDE/Welding, Electrical, Instrumentation, QA/Mechanical. DPRP Section Chief attend exit meetings.

NMP2 AUGMENTED INSPECTION PLAN

Item No.	Action	Responsibility	First Inspection(I) First Meeting (M) First Review (R)	Frequency	Remarks
11.	Construction Team Inspection (CTI)	DPRP/DETP	No Later Than 8/84(I)	Once	6-7 DETP 2-3 DPRP
12.	Vendor Inspection of SWEC Cherry Hill/Boston/ Site	DETP/VPB	Calendar Yr 84 (I)	Once	Focus on Design Controls
13.	Site visits to assess Licensee interim Corrective Actions	DPRP Section Chief	5/84(I,M)	Monthly	
14.	Provide Construction SRI's to augment routine Inspection effort	Construction SRI	4/84(I)	Month assignments to site	Provide input to routine resident inspection report
15.	Convene Meeting of Regional Personnel	DPRP Div. Dir.	9/84(M)	Once, following CTI	Hold meeting to review licensee Actions, Inspection Findings & Evaluate Progress, Rescope Plan if required
16.	Recruit and assign additional resident inspector	Project Branch 2/ DPRP Section Chief	Ongoing	Once	To supplement inspector presence on site
17.	Interim assessment of licensee activities	DPRP Section Chief/ SRI	11/84	9 mos. from previous SALP	Use to measure program effectiveness and licensee performance
18.	Develop licensee performance indicators and AIP implementation milestones	DPRP Section Chief		Continuous	To be provided as Attachment 3

## Attachment 1

### General Areas of Concern and Action Plan Outline for Augmented Inspection Program (AIP)

1. License Project Management Effectiveness
  - Project Manager Role
2. Quality Control Inspection Programs
  - Inspection Criteria
  - Retrofit inspections of previously inspected items
  - Inspection Procedures and documentation
  - Inspector qualifications
3. Nondestructive Examination Programs
  - NDE Procedures
  - NDE Personnel qualifications
  - Retrofit inspections of previously examined items
  - NRC NDE Van independent verification inspection
4. QA Programs
  - Audit conduct
  - Corrective Action Systems
  - Surveillance/Monitoring conduct
  - Trending
5. Procurement Quality Assurance/Vendor QC
  - PQA procedures
  - Retrofit inspection of delivered hardware
6. Design Document Control
  - Drawing Control
  - Design Document posting
  - Design Document issuance rates and review

## Attachment 2

## Existing Region I Findings to Monitor

<u>Item</u>	<u>Description</u>	<u>Corollary CAT Finding</u>
82-12-04	Void issue drawing control	Inadequate drawing control
82-00-16	Enhancement of site radiographs	IIT radiographic problems
83-00-02	Enhancement of shop radiographs	
83-11-02	Tray fill verification not in Spec.	Deficient Inspection Procedures
83-07-03	High Strength bolt procedure deficient	
83-04-03	HVAC inspection program	
83-03-01	Inspection of Kellum grips	
83-01-11	Inspection of Temporary supports	
82-14-02	Inspection of High Strength Bolts	
82-10-05	Inspection of concrete anchorbolts	
83-12-06	Hold points not incorporated in procedures	
83-07-04	Support improperly installed	Pine supports not constructed per design
83-05-06	Support gaps not checked correctly	
83-01-05	Support clearance requirements lacking	
83-12-11	Support design not reflective of field tolerances	
83-03-05	On-Site PGCC inspection undefined.	PGCC wiring
83-00-04	Vendor PGCC wiring not properly separated	
83-08-03	Gould MCC wiring deficient	Vendor Inspection
81-13-04	Cable tray not qualified to specification	
82-01-06	Lack of traceability for IIT support material	Material traceability
82-10-08	Temporary anchor bolts not controlled	
82-02-04	Control of bolting material	
82-08-01	Class 1 weld procedures not qualified	Support weld problems
83-05-03	IIT failed to identify trends	Corrective Action Programs
83-16-08	Inadequate feedback of RCI nonconforming conditions	

Attachment 2 (cont'd)

83-04-01	NMPC Surveillance program	Audit programs
81-13-01	NMPC audit findings not timely addressed	
83-06-03	FSAR submittal inaccurate	
82-11/1-82-078	Use of trainees to inspect not detected by licensee	
83-06-01	Nonconformance justification lacking	Corrective Action Programs
83-04-01	Non-timely corrective action implementation	
81-13-01	Delayed corrective action implementation	