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MEMORANDUM FOR: Samuel J. Collins, Chief, Project Branch #2  
Division of Project of Resident Programs

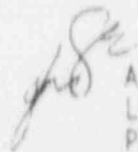
THRU: Stewart D. Ebnetter, Director, Division of Reactor Safety *SE*

FROM: Alan E. Finkel, Lead Reactor Engineer, Plant System Section,  
Engineering Branch, Division of Reactor Safety

SUBJECT: DIVISION OF REACTOR SAFETY INPUT FOR NINE MILE POINT #2 SALP  
(10/1/83 - 1/31/85)

Attached is the proposed SALP evaluation of Nine Mile Point #2 for the Division of Reactor Safety. The evaluation is based on the DRS Inspection's Reports shown in the table which were conducted during the SALP period. The evaluation is based upon the post-inspection SALP evaluations by the individual inspectors.

If you have any questions, Please contact me at Ext. 5284.



Alan E. Finkel  
Lead Reactor Engineer  
Plant System Section  
Engineering Branch, DRS

Attachments: As stated

cc:  
C. J. Anderson  
L. H. Bettenhausen  
J. P. Durr  
W. J. Lazarus  
R. Gramm/R. Wheeler  
D. L. Capton

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Nine Mile Point 2 Inspection

Performed by DRS (10/1/83 - 1/31/85)

<u>Report No.</u>	<u>Lead Inspector</u>	<u>Area</u>	<u>Hours</u>	<u>Violations No. / Severity</u>
410/83-15	Finkel	Electrical	28	- / -
410/84-02	Finkel	Electrical	32	1 / IV
410/84-04	Varela	Concrete Anchors	32	- / -
410/84-07	Narrow	Pipe Supports	31	- / -
410/84-08	Kirch	NRC Mobile Lab	462 Site 200 off Site	1 / IV 2 / V
410/84-14	Reynolds	Welding	34	- / -
410/84-17	Narrow	Maintenance	30	- / -
410/84-18	Durr et-al	CTI Mechanical Elec Inst, QA, Piping, Engineers	592 Site 115 off Site	1 / V 1 / IV
410/85-01	Briggs	Preoperation	26	- / -

NINE MILE POINT UNIT 2  
CONSTRUCTION TEAM INSPECTION  
SALP

A Construction Team Inspection was performed during the period December 3-14, 1984. The team consisted of eight engineers and technicians and a section chief team leader. The inspection covered the areas of management, quality assurance, design control, mechanical, welding, electrical, instrumentation, civil/structural, and nondestructive examinations. The inspection concentrated on determining if the current construction program was effective.

The inspection identified two violations. The first dealing with a failure to properly maintain equipment in in-place storage. This was a general condition found in the plant and was characterized by uncovered valve mechanisms and pipe ends and water left standing in diesel generator heat exchangers. The second violation identified a failure to fabricate and inspect instrument support drawings. This finding is related to the CAT finding which cited a failure to inspect to the requirements. However, this was the only finding of this sort and will have very little effect on the function of the support. In general, the team found installations to be in accordance with the requirements and the licensee to be responsive to our concerns.

It was noted that quality control has experienced a significant problem in attracting and retaining qualified personnel to keep pace with the construction effort.

This has led to extensive use of overtime for the inspectors which could reduce their effectiveness if continued over an extended time period. The demoralizing effect of the CAT, INPO and over-inspection programs on the quality control staff has been countered to some extent as evidenced by comments from QC inspectors that they now receive good management support.

The licensee's review of the radiographic program was examined during the inspection to assure that the directed evaluation was progressing satisfactorily. The licensee has essentially completed the re-review and has identified a condition where an inspector radiographed the wrong welds. This occurred on at least two occasions. The problem is yet to be addressed. However, the remainder of this program appears to be acceptable.

The licensee has made major changes in the management staff of both Niagra Mohawk Power Corporation and Stone and Webster Corporation. These changes have occurred over the past year, the last one occurring in November just before the CTI with the replacement of the NMPC Project Manager. The management team seems to be functioning well, they have made significant changes to programs and have established good working relationships which promotes communications and solutions to problems. The NRC needs to observe this relationship and assure it is kept functional.

Based on the lack of significant hardware findings and the noted management effort and involvement, the CTI recommends a Category 2 for this area.

#### Electrical/Instrumentation and Control

During this evaluation period there were two inspections relating to the electrical/instrumentation area. There was one violation issued for failure to fill out the NTDR form as defined in procedure QS 15.1.

The NRC is concerned that items being identified as deficient by the licensee's site quality personnel were not receiving adequate attention at the corporate level. Specific areas were the quality level of the PGCC equipment delivered by General Electric, the problems in the as-built configuration verification of the PGCC hardware, the GE drawings and the lack of overall auditing of the electrical/instrumentation program by the licensee.

Conclusion: Category 3

#### Maintenance of Safety Related Equipment (See also CTI Section)

During this evaluation period there was one inspection related to the maintenance and storage of safety related equipment. The inspection established that maintenance was slow in correcting problems in the area.

A delay of three months was incurred in providing protective coverings for instrument rack No. 2CES\*RAK109. During this time, vapor capsules were attached to the rack although they were totally ineffective because of lack of an enclosure. Ambient temperature remained within the prescribed limits during most of this time. The causes of the delay were due to ineffective coordination of actions by several groups involved in the transfer of the rack from the warehouse to its installed location. Storage and protection in both locations is the responsibility of Stone and Webster while protection during transfer is the responsibility of Johnson Controls Inc. (JCI).

The above indicates that the interface controls between Stone Webster and Johnson Controls, Inc. requires increased licensee management involvement and oversight of contractor activities in the electrical and I&C area.

Conclusion: Category 1

#### Welding, Piping and Civil Structural Inspections

During this evaluation period there were three inspections in the area of welding, piping and concrete expansion anchor bolts. The various areas involved in these inspections included small and large bore pipe supports, welded structural steel, welding operations and concrete anchors.



A major concern in welding is the complexity of various welding programs due to the number of contractors each having a separate program. The lack of having a simple welding program has generated a variety of levels of effectiveness requiring an intensive inspection effort to review the current and post activities to assure acceptance with the site criteria.

ITT Grinnell (piping and supports) has recently increased the number of quality control qualified personnel trained to the site criteria. The quality accountability program developed by ITT provides continuous monitoring, trending and correction of nonconformances. Trends show a decrease in the rejection rate for mechanical installations and welding of pipe supports.

In the area of Civil/Structures the license has increased its quality assurance staff with qualified and trained personnel. Additional testing on concrete expansion anchor bolt and additional inspections of shop welded AWS structure steel are being performed.

Conclusion: Category 1

#### Preoperational Testing

During this evaluation period there was one inspection in the area of preoperational testing. Draft copies of the preoperational test procedures and the licensee program, defined with appropriate procedures contained in the start-up manual were inspected. The QA/QC involvement in the preoperational test program is being developed at the present time. The test program as well as system turnover criteria is in the process of being developed.

Conclusion: Category 1

#### NRC NDE Mobile Lab Inspection

The NDE mobile laboratory conducted independent measurements from May 14-25, 1984 on plant piping, welds, and anchor bolts. Three violations were issued (Inspection Report 50-410/84-08); two dealing with not recording all radiography information identified on the film and one dealing with the lack of acceptance data on drawings. During this inspection period a large number of personnel was changed and it was difficult to determine if there was adequate staffing to perform the required NDE program requirements at the site. The NDE program weakness was supported when it was determined that no NDE level III person was responsible for an overall site NDE program.

The lack of an assigned overall site NDE responsibility, for review and acceptance of radiographs, is not adequate to assure that the applicable ASME code requirements are being satisfied. The problem of missing and incorrect radiographic data, identical radiographs on file for two different welds, inadequate

procedures to control quality of work, and minimum pipe wall thicknesses not being identified are examples of the need for an overall level III responsibility for this site.

Conclusion: Category 3