

SEP 03 1986

MEMORANDUM FOR: Sam Collins, Chief, Projects Branch No. 2
FROM: Lee Bettenhausen, Chief, Operations Branch
SUBJECT: NINE MILE POINT UNIT 2 READINESS REPORT DRAFT

We have the following inputs for the subject draft report:

° Section 3.0, Preop Testing

3.2 Inspection Program History and Findings

The preoperational test inspection program began in January 1985. The program was conducted by both resident and region-based specialist inspectors. Inspections conducted to verify management controls and procedures, including quality assurance programs, have not identified any significant programmatic weaknesses. Inspection of test procedures, test performance and test results has progressed consistent with the applicant's scheduled activities.

NRC preoperational test procedure review and test observation are essentially complete. Review of the applicant's test results, resolution of test deficiencies and retesting continues at this time.

NRC review of selected test procedures indicates adequate testing of system functions and logic. The performance of preoperational tests has been generally acceptable. The few examples found in which the preoperational acceptance criteria were inconsistent with licensing commitments were corrected. The test engineers were found knowledgeable of their systems and the administrative test controls.

3.4 Quality Assurance for Testing

Startup Quality Assurance and Quality Control personnel performed both monitoring and auditing functions during preoperational testing. The presence of startup QA/QC throughout the preoperational test procedure review, test performance and test results review processes has been evident and adequate.

Testing Summary and Conclusions

Region I's inspections of the Nine Mile Point Unit 2 preoperational test program included programmatic reviews, test procedure reviews, test witnessing and test results evaluation. The technical adequacy of test procedures has been acceptable and the personnel performing tests have been well qualified. NRC review has determined that the

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test results review and approval process and the applicant's resolution of test exceptions and deficiencies have been well documented and supported.

Note: The number of NRC reviewed preop tests shown in the draft report should be changed from 7 to 19.

° Section 4.0, Preparations for Operations

Preparations for Operations

The Region I review of the applicant's preparations for operations included inspections of procedure preparation, review, and approval as well as implementation where possible. Management control of the process and safety committee actions were also evaluated.

Specific inspections between April and July 1986 reviewed plant administrative, operating, maintenance, and emergency procedures. The licensee has prioritized the preparation process and has written those procedures needed for modes 5 and 6 first. Most procedures had been prepared, reviewed, and approved as interim operating procedures. The applicant's plans were to field test the procedures and after additional review, convert them to plant procedures.

Inspection results indicate two additional areas where the applicant is continuing to finalize their programs: 1) preventive maintenance scheduling for electrical instrumentation, and 2) completing the master surveillance scheduling program.

The applicant's actions to date and plans for completion appear adequate for initial station operations.

° Section 4.3, Quality Assurance for Operations

The implementing QA procedures were developed from existing Unit 1 procedures which complied with ANSI N45.2 and its daughter standards. These implementation procedures reference ANSI N45.2 and its daughter standard and generally exceeded the requirements of the licensee's QA Topical report. The applicant, upon issuance of the QA Topical report, initiated a consistency review of implementing procedures against the QA Topical. Several inconsistencies in references were identified by both the licensee and the NRC.

Currently, the applicant is reviewing and updating the implementing procedures to incorporate references to the QA Topical and NQA-1 Industry Standard. The applicant's current schedule is to complete this effort prior to commercial operation.

• Section 4.9, Startup Test Program

The applicant has prepared drafts of all startup tests and has approved 75 of 121. The applicant recognized that some inconsistencies may exist between the startup procedures and approved operating procedures so that a second review of the startup test procedures for consistency and workability will occur prior to use. Inspection findings also supported a need for a second review.

The applicant has proposed some reductions of their test program (based on the Hope Creek program) but the magnitude of the reduction proposals are far less than approved for Hope Creek.

The administrative controls for the implementation of the startup test program have been revised based on inspection findings and represent adequate controls to implement the program.

The staffing levels of the startup program are adequate to implement the program. Training of personnel including operators and test personnel will be performed prior to beginning the program.

Original Signed By:
Lee H. Bettenhausen

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