NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

NMP-4623

June 3, 1982

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Re: Docket No. 50-220
Inspection Report No. 82-01

Dear Mr. Starostecki

This refers to the routine safety inspection conducted by Mr. S. Hudson of your office on January 1 to February 7, 1982, at Nine Mile Point, Unit 1, Scriba, New York, of activities authorized by NRC License No. DPR 63 and to the discussions of your findings held by Mr. S. Hudson with Mr. T. Roman of our staff at the conclusion of the inspection.

ITEM A 10 CFR 50, Appendix B, states in part, "VI. Document Control - Measure shall be established to control the issuance of documents such as instructions, procedures and drawings, including changes which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy ..."

Contrary to the above, examination of drawings and procedures demonstrated that measures were not effective in that the installation of the drywell to torus differential pressure instrumentation and its isolation valves were not reflected in the documents listed below:

--- P&ID #C-18014-C "Reactor Containment Inert Gas Purge and Fill System", Revision 15, dated December 6, 1980.

--- ISP-IC-21, "Pre-Startup Valve Lineup Check", Revision 4, dated June 29, 1981.

--- ISP-IC-23, "Integrated Leak Rate Test of the Primary Containment", Revision 9, dated June 8, 1981.

RESPONSE The following corrective steps have been taken to correct the identified violation:

1. P&ID #C-18014-C, "Reactor Containment Inert Gas Purge and Fill System", has been submitted for revision to update the drawing so it reflects the actual condition of the installed instrumentation and isolation valves.

2. Procedure ISP-IC-21, "Pre-Startup Valve Lineup Check", is in the process of being revised and will be approved prior to the next startup.

3. Procedure ISP-IC-23, "Integrated Leak Rate Test of the Primary Containment" has been revised and currently reflects the correct status of the instrumentation and isolation valves.

In addition to the above listed actions, in January, 1982, Niagara Mohawk Power Corporation established a new, full-time position on the Nine Mile Point staff whose sole responsibility is Coordination of Modifications. This will ensure that adequate reviews are made of instructions, procedures and drawings with respect to updating them due to modification changes.

As requested in Paragraph 4 of your May 7, 1982 letter, the following is a list of the steps Niagara Mohawk Power Corporation is taking to correct the identified infractions and unresolved items:

1. Infraction 79-21-05. CRD Valve Lineup.
As per discussions with NRC Inspector Mr. Doerflien, the CRD Valve Lineup is acceptable as is.

2. Infraction 79-21-04. P&ID drawings not as-built.

   a. Dwg. C-18007-C, Reactor Core Spray - A Drawing Change Request has been submitted to correct the location of drain valve CRS-734.

   b. Dwg. C-18012-C, Sh. 2, Reactor Containment Spray - A Drawing Change Request has been submitted adding 2 drain valves on the Rx. side of each of the Containment Spray Discharge Valves 80-15 and 80-16, 80-35 and 80-36.

   c. Dwg. C-18017-C, Emergency Cooling System - A Drawing Change Request has been submitted adding a second drain valve on the Rx. side of valves 39-09 and 39-10.

3. Infraction 79-21-07. Valves not labeled as required.

   a. Emergency Condenser Makeup from Fire System Valves #FS-44 and #FS-45 have been correctly labeled.

3. Infraction 79-21-07. Valves not labeled as required. (Continued)

   b. Procedure N1-OP-13 has been revised, removing the incorrectly identified valves from the VCOL.

   c. 8 containment spray drain valves are correctly labeled.

   d. Procedure N1-OP-14 will be revised to include the 8 containment spray drain valves on the VCOL.

4. Unresolved Item 79-21-08. Revise valve lineup procedures.

   a. Diesel Generators - The position of DGA-34 as listed in the VCOL has been determined to be acceptable as per discussion with NRC Inspector Doerflien.

   b. Core Spray System - The position of PCV's #81-85 and #81-86 as listed in the VCOL has been determined to be acceptable as per discussions with NRC Inspector Doerflien.

   c. Containment Spray System - Procedure N1-OP-14, "Containment Spray System" has been revised and currently lists the power supply for valve #80-21 in Table II.

      The Containment Spray flow rate control valves position on the VCOL has been determined to be acceptable as per discussions with NRC Inspector Doerflien.

   d. Reactor Shutdown Cooling - Procedure N1-OP-4 "Shutdown Cooling System" has been revised and currently lists valve SC-757 in the VCOL.

   e. Control Rod Drive - The hose identified in the Inspection Report has been removed and a cap has been installed.

   f. Liquid Poison System - Procedure N1-OP-12 "Liquid Poison System" has been revised and currently lists the power supply for heat tracing in Table II.

In addition to the above, Niagara Mohawk Power Corporation is also implementing a two phase program to prevent the recurrence of these problems. Phase I entails a complete review of the normal Operating Procedures to verify (1) Correctness of content, (2) Completeness of content, (3) Clarity of content, and (4) Procedure format. Phase II entails a complete Field Check and review of the normal Operating Procedures by the shift operating personnel. This review will encompass: (1) Correctness of content, (2) Completeness of content, (3) Clarity of content, (4) Valve lineup completeness

including field labelling of all valves listed in the valve lineup, (5) Power Supply data correctness. The information collected in Phases I and II will be incorporated into proposed revisions of the Operating Procedures and reviewed for approval by the Site Operations Review Committee.

Very truly yours

Thomas E. Lempges

Thomas E. Lempges
Vice President, Nuclear Generation

TEL/HB/jm