

May 30, 1984  
(NMP2L 0070)

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

Dear Mr. Starostecki:

RE: Nine Mile Point Unit 2  
Docket No. 50-410

Your Inspection Report No. 50-410/84-01 dated April 20, 1984, identified one apparent violation resulting from an inspection conducted at the Nine Mile Point Unit 2 construction site. Niagara Mohawk's response is enclosed.

Very truly yours,

*C. V. Mangan*  
C. V. Mangan  
Vice President  
Nuclear Engineering and Licensing

TL:lf

Enclosure

cc: Mr. R. Gramm, Resident Inspector

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

Response to Notice of Violation  
Attached to NRC Inspection Report  
No. 50-410/84-01

The first apparent violation was identified as follows:

1. 10CFR50, Appendix B, Criterion X and the Nine Mile Point Unit 2 PSAR require that inspection be provided to ensure the conformance of field installations to design drawings and procedures. ITT Grinnell procedures FQC-4.1-3-9 and FQC-4.2-14-9 require pipe support installations to be inspected to verify welding and mechanical attributes.

Contrary to the above, as of February 27, 1984, the following ITT Grinnell final-accepted pipe supports, BZ-19EA-3, BZ-19PN-3, BZ-19KZ-2 and BZ-11ST-1, were reinspected by the NRC and found to have nonconformances to the design criteria.

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

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

The root cause of these nonconformances has been addressed as part of the Niagara Mohawk response (dated May 4, 1984) to the Construction Appraisal Team (CAT) Notice of Violation, Item B.

The corrective actions taken for the specific examples cited above are as follows:

Support BZ-19EA-3: Deviation Report No. 5828 was written on February 24, 1984 to document the undersize weld. The area was prepped and rewelded. The Deviation Report was closed April 17, 1984.

Support BZ-19PN-3: Nonconformance and Disposition Report No. IG-2019 was written March 1, 1984, to document the absence of upset threads. The repair was completed and the Nonconformance and Disposition Report closed on May 3, 1984.

Support BZ-19KZ-2: Deviation Report No. 5830 was written on February 27, 1984, to document the fact that slag had adhered to the face of the weld in two areas. The slag was removed, the area inspected for defects, and the weld was repaired. The Deviation Report was closed April 20, 1984.

Support BZ-11ST-1: Deviation Report No. 5827 was written on February 24, 1984 to document the undersize weld D. The disposition was to prep the joint at D and add weld. However, the subject support was subsequently removed, scrapped and replaced due to reasons unrelated to the finding. This was documented in Deviation Report 5878.

The actions taken to prevent recurrence have been addressed as part of Niagara Mohawk's response (dated May 4, 1984) to the Construction Appraisal Team (CAT) Inspection Notice of Violation, Item B, Example 3.

The second apparent violation was identified, in part, as follows:

2. 10 CFR 50, Appendix B, Criterion V and the Nine Mile Point Unit 2 PSAR require that activities affecting quality are conducted in accordance with documented procedures. Niagara Mohawk Power Corporation procedure PPNM151 requires that employees report significant deficiencies to the licensing manager. Further, Stone & Webster Engineering Corporation procedure QS-16.2 requires a timely review of significant deficiencies.

Contrary to the above, as of February 10, 1984, NMPC site employees had not notified the licensing manager of a significant deficiency involving ITT Grinnell liquid penetrant examinations and SWEC had not conducted a timely review of a significant deficiency identified in ITT Grinnell letter ITT-LTR-4897. Further, no documentation exists to verify timely review of NMPC QA nonconformance reports as evidenced by NR-349 not having received a licensing review for reportability until one year and nine months after issuance.

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

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

Niagara Mohawk interprets the violation as follows:

1. Niagara Mohawk Power Corporation site employees did not notify the Licensing Manager of a potentially reportable problem in accordance with project procedures.
2. Stone & Webster Engineering Corporation's failure to perform a timely review of a potential problem identified in ITT Grinnell letter ITT-LTR-4897.
3. No documentation to verify a timely potential 50.55(e) review of Niagara Mohawk Power Corporation Quality Assurance nonconformance reports.

Niagara Mohawk concurs with the first portion of the violation in that Niagara Mohawk Power Corporation site employees did not notify the licensing manager of a potentially reportable problem in a timely manner. The Niagara Mohawk Project Procedure (NMPP) 151 delineates the evaluation and reporting of potentially significant deficiencies in accordance with 10CFR50.55(e).

Niagara Mohawk concurs with the second portion of the violation in that Stone & Webster Engineering Corporation Quality Assurance and ITT Grinnell personnel had not conducted a timely review of a potential problem identified in ITT Grinnell letter ITT-LTR-4897. Stone & Webster's Construction Site Instruction (CSI) 1.14 delineates the procedure for processing contractors' request for evaluation of significant deficiencies.

As corrective action, the problem concerning the ITT Grinnell liquid penetrant examinations was reported in accordance with 10CFR50.55(e) to the Nuclear Regulatory Commission Region I office on February 10, 1984.

The preventive actions are:

1. The Nine Mile Point Unit 2 Licensing Manager issued a memo (dated February 15, 1984) to Niagara Mohawk Nine Mile Point Unit 2 project personnel

reviewing their responsibility for evaluation of potentially reportable items and emphasizing the project procedures that govern the reportability of potentially reportable deficiencies in accordance with 10CFR50.55(e).

2. Niagara Mohawk directed Stone & Webster Engineering Corporation (letter dated February 29, 1984) to review and revise their procedures as necessary to improve the timeliness of reporting potential 50.55(e)'s. The review and procedure revisions have been completed.
3. Niagara Mohawk directed Stone & Webster (letter dated February 29, 1984) to issue a memo to Stone & Webster site project personnel and to site contractors reviewing their responsibility for identification and evaluation of potentially reportable problems. This action has been completed.
4. Niagara Mohawk has reviewed its procedure governing the reportability of potential 50.55(e)'s and is revising the procedure to improve identification of potentially reportable conditions. This action will be complete by July 31, 1984.

Additional actions taken to prevent recurrence have been addressed as part of Niagara Mohawk's response (dated May 4, 1984) to the Construction Appraisal Team (CAT) Notice of Violation, Item G, Example 7.

In response to the third portion of the violation, Niagara Mohawk procedures require its personnel to notify the Licensing Manager of any condition which could be considered reportable in accordance with 10CFR50.55(e). In order to provide the documentation to demonstrate a review for reportability in accordance with 10CFR50.55(e), Niagara Mohawk will perform a re-review of Niagara Mohawk Power Corporation Quality Assurance Non-conformance Reports. This action will be complete by September 28, 1984.

To prevent recurrence of this problem, the Niagara Mohawk Quality Assurance Nonconformance Report form for the Nine Mile Point Unit 2 project has been revised (and renamed Corrective Action Request) to include a preliminary review for reportability in accordance with 10CFR50.55(e). Procedures will be written to ensure a documented 50.55(e) review of Nonconformance Reports and Audit Finding Reports generated in the Syracuse office. This action will be completed by July 31, 1984.

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