



August 9, 1984  
(NMP2L 0122)

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

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

Dear Mr. Starostecki:

Enclosed is a final report in accordance with 10CFR50.55(e) for the problem concerning Power Generation Control Complex separation (55(e)-84-14). This problem was reported via telecon to Mr. S. Collins of your staff on March 23, 1984. An interim report was submitted in a letter dated April 24, 1984.

Very truly yours,

C. V. Mangan  
Vice President

Nuclear Engineering & Licensing

TL:ja  
Enclosure  
xc: Director of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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

Final Report for a Problem  
Concerning PGCC Separation  
(55(e)-84-14)

Description of the Problem

Nonconformances in separation criteria have been identified by a Field Quality Control inspection of Power Generation Control Complex (PGCC) panels. These wiring separation nonconformances were not documented and justified by General Electric during the manufacturing process prior to shipment.

Investigation jointly undertaken by Stone & Webster Engineering and Field Quality Control personnel have identified deviations from the separation criteria in the following areas:

1. Separation between divisions of safety-related systems.
2. Separation between channels of channelized safety-related systems.
3. Separation between divisions and channels of safety-related systems.

Analysis of Safety Implications

The problem identified is a deviation from the separation requirements of Regulatory Guide 1.75. If the separation criteria were not met, a possibility exists that under certain conditions, the loss of devices in one division may result in adversely affecting the safety function of devices in the other division. Therefore, if this problem were to have remained uncorrected, it could have adversely affected the safety of operation of the plant.

Corrective Action

To correct the wiring separation nonconformances and to prevent future possible nonconformances in separation requirements, the following actions were undertaken:

1. Definition and clarification of General Electric's separation requirements for the three identified areas above. This task has been completed pending ongoing verification by Niagara Mohawk.
2. Incorporation of the separation requirements in the specification and drawings. General Electric presently is performing this task.
3. Justification by analysis of exceptions to the established separation criteria. General Electric is presently performing this task.
4. Rework of the panel wiring by Construction to meet the requirements identified in corrective action Items 1 and 2 above. Stone & Webster Engineering Corporation presently is performing this task.

The completion date for the above corrective actions is December 31, 1984.

Per a discussion between T. Loomis (NMP2 Licensing) and S. Collins of your staff on June 29, 1984, the above corrective actions ensure a completion of the corrective actions as stated in our final 50.55(e) report concerning separation criteria for the Power Generation Control Complex equipment dated October 28, 1983.

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