

July 27, 1984
(NMP2L 0113)

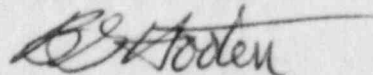
Mr. R. W. Starostecki, Director
U.S. Nuclear Regulatory Commission
Region I
Division of Project and Resident Programs
631 Park Avenue
King of Prussia, PA 19406

Subject: Nine Mile Point Unit 2
Docket No. 50-410
Status of Response to Notice of Violation

Dear Mr. Starostecki:

Our letter to the Nuclear Regulatory Commission dated May 4, 1984 responded to the Construction Appraisal Team inspection report and specified the corrective and preventive actions to be taken by Niagara Mohawk Power Corporation in response to that report. In accordance with our discussions with Region I, attached is the status of items identified by our ongoing verification and review process. We shall keep you informed of any further developments.

Very truly yours,



B. G. Hooten
Executive Director
Nuclear Operations

GG:ja
Attachments

xc: Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Project File (0030H)

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1. Violations A, E and F - All corrective and preventive actions with regard to these violations were implemented by June 15, 1984.
2. Violation B - All corrective and preventive actions with regard to this violation were implemented by June 15, 1984, except as clarified below:

- a. Example 1 (page B-3)

The pipe associated with shop weld 01-21-MSS-150-1-129 SWB was cut out prior to June 15. It was necessary to obtain replacement materials. The materials were not installed by the commitment date due to procurement problems. This material is expected to be shipped by August 3, 1984.

The radiography to correct the density deficiency associated with shop weld 57-1-ICS-142-2-2 SWA R/1 was completed by June 15, 1984. All associated documentation was closed by July 25, 1984.

The work required by DR 5588 associated with weld CSH-25-21-006 R/1 was completed and the final radiography accepted on June 28, 1984.

- b. Example 1 (page B-4)

Repairs associated with RHS-66-38-004 R/1 were completed by June 28, 1984. All associated documentation was closed by July 3, 1984.

- c. Example 1 (page B-7)

The re-radiography associated with the twelve additional welds which resulted from Niagara Mohawk review has now been completed. The final documentation for welds is being processed. This item will be closed in August 1984.

- d. Example 2 (page B-8)

Permanent identification of raceways which had been identified as unsatisfactory was completed and inspected by July 16, 1984.

(As a matter of information, subsequent field verification determined that some required barriers were not identified on drawings. Additional "L" status identification was required, and will be completed by August 15, 1984.)

- e. Example 2 (page B-9)

By June 15, 153 of the 188 personnel had been retrained regarding the use of the "L" status indicator. All required training was completed by June 22, 1984.

f. Example 2 (page B-10)

The FQC sample inspection of mechanical equipment field assembly bolting was completed by July 9, 1984. Electrical equipment field assembly bolting will be inspected by July 31, 1984.

g. Example 3 (page B-12)

RCI reported the welds were repaired and this item was closed by June 15, 1984. (As a matter of information subsequent review by the independent audit team discovered that undersize welds still existed in the Enterprise Control Rod Drive structural steel systems. This was further verified by Niagara Mohawk QA, and has been reported as a 10CFR50.55(e). This item will be closed in accordance with the requirements of 10CFR50.55(e)).

h. Example 3 (page B-13)

The rework of the pipe clamp and strut (support 72 VL) was completed by June 15, 1984 and documentation closed on July 20, 1984.

i. Example 3 (page B-14)

Support 19RX was evaluated, and it was determined that the support should be removed and replaced instead of being shimmed. The deficient support was removed prior to June 15, 1984.

j. Example 3, Preventative Actions (page B-14)

Over 90% of the approximately 1200 personnel were trained prior to June 15, 1984. Training sessions for the remaining personnel were completed by July 25, 1984.

k. Example 5 (page B-16)

ITT Grinnell's training and certification procedures were revised prior to June 15 to require the NDE Supervisor or designee to perform a surveillance over the initial liquid penetrant examination for each new employee. Memos documenting these surveillances were included in all current employee qualification records by July 20, 1984.

3. Violation C - All corrective and preventive actions with regard to this violation were implemented by June 15, 1984, except as clarified below:

a. Examples 2 and 3 (page C-3)

Prior to May 4, 1984, SWEC notified NMPC that based on a computer run, all 145 drawings had been revised. Subsequent verification showed 14 of these drawings had not been revised. These 14 drawings have now been revised.

b. Examples 2 and 3 (page C-5)

Contrary to our best effort, the backlog of QA Category I ACN's have not been eliminated. The project was committed to complete incorporation of the backlogged QA Category I ACNs by June 15, 1984. SWEC monitored progress on a monthly basis and recorded satisfactory progress from October 1983 through March 1984. Our monthly progress monitoring system was insufficient to provide early detection of slippage in the rate of incorporation of ACNs. As a result, our commitment date will slip to August 31, 1984. To prevent recurrence of such delays, Niagara Mohawk management is monitoring progress on a weekly basis and taking necessary action to assure completion by August 31.

4. Violation D - All corrective and preventive actions with regard to this violation were implemented by June 15, 1984, except for one item.

Generic Preventive Actions (page D-7)

The inspection plan for receiving inspection was revised to address workmanship concerns by July 20, 1984.

Based on NMPC QA follow up of this item, it was determined that the revision did not satisfy the intent of the commitment. Subsequently, NMPC QA directed SWEC to further address receiving inspection plans and implementation. This action will be completed by August 30, 1984.

5. Violation G - All corrective and preventive actions with regard to this violation were implemented by June 15, 1984, except as identified below:

a. Example 1 (page G-3 and G-4)

Type "C" Inspection Reports P2G00157, P3G00345 and P2G00135 are currently open and are scheduled for completion in August 1984. (As a matter of information, Type "C" Inspection Reports P3G00352, P3G00411, P3G00012, P3G00244, P3G00196 and P3G00096 were closed prior to May 4, 1984. Subsequent verification discovered that these reports were incorrectly closed. Corrective action has been completed on all these items, except Inspection Report P3G00196, which will be complete in August.)

b. Example 1 (page G-5)

The procedure for control of SWEC contractor monitoring and associated Type "C" Inspection Reports was revised and approved on July 19, 1984.

c. Example 4 (page G-9)

The review of previously issued Reactor Controls, Incorporated (RCI) surveillance reports to verify that potential nonconformances have been correctly documented was completed on June 22, 1984.

d. Example 7 (page G-11)

Of the 186 Niagara Mohawk QA open items identified during the CAT Inspection, two items remain open and will be closed by August 1, 1984.

6. Violation H - All corrective and preventive actions with regard to this violation were implemented by June 15, 1984, except for one item.

a. Example 1 (page H-2)

Subsequent verification has determined that Inspection Plan N2CE061AFA025 addressed only routing inspection. The inspection plan was revised by July 2, 1984 to adequately address all applicable specification requirements.