



August 29, 1984
(NMP2L 0147)

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: NINE MILE POINT UNIT 2
DOCKET NO. 50-410
CLARIFICATION OF CAT 83-18 VIOLATION RESPONSE

Dear Mr. DeYoung:

Niagara Mohawk Power Corporation met with Nuclear Regulatory Commission representatives (NRC) on July 16, 1984 to discuss five issues for which the NRC desired additional details and/or clarification regarding the responses provided in Niagara Mohawk's May 4, 1984 letter.

The attached information summarizes the conference discussions and provides requested details beyond those provided in the meeting. It is our understanding that the NRC representatives were satisfied with the information provided at the meeting, and that the issues could be considered closed, pending receipt and acceptance of the information included herein.

Very truly yours,

C. V. Mangan
Vice President
Nuclear Engineering and Licensing

CVM/GG/pbd
Attachment

Project File (2)

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CAT Response Clarifications
Based on July 16, 1984 Meeting

On July 16, 1984, representatives of the Nuclear Regulatory Commission (NRC) met with Niagara Mohawk (NMPC) and Stone and Webster (SWEC) to discuss selected responses provided in NMPC's May 4, 1984 letter to the NRC. The following, summarizes, by topic, the conference discussions and provides requested details beyond those provided in the meeting.

1. Response to Violation A, Example 2

Additional testing was performed to provide supplemental information for the NRC concern regarding prequalification of drilled in anchors in 1000 psi design mix concrete. Three 3/4" diameter and three 1" diameter bolts were installed in 3000 psi design mix concrete. The six bolts were installed to the specification requirements and tension tested to a test load four times the allowable design load. Each bolt was shown to exhibit a capacity up to the test load, providing confirmation of compliance to the I.E. Bulletin 79-02 required design safety margin of 4 to 1. These tests were performed subsequent to the tests reported upon in the May 4, 1984 letter, which were performed on 12 installed bolts tensioned to design loads.

2. Response to Violation F, Example 4

Niagara Mohawk's May 4, 1984 response to the CAT enforcement letter referred to additional testing and engineering analysis to verify that shielding requirements have been satisfied. The following provides additional details concerning this work.

A review of concrete test reports prior to December, 1983, for all concrete placements in shielding areas was performed. An estimated 5000 placements were reviewed using the conservative assumption that the dried unit weight is 3 pounds less than the fresh unit weight. Using this conservative assumption it was determined that approximately 1% of these placements may have densities at or marginally below 135 pounds per cubic foot. These placements were reviewed by the SWEC Radiation Protection Group and no impact on radiation shielding requirements was found. This evaluation provides additional assurance that the in-place concrete provides adequate shielding.

3. Response to Violation E, Example 1

Niagara Mohawk's May 4, 1984 response to the CAT enforcement letter states that component standard support material supplied in accordance with ASME Section III, Division I NA-3766.6 and code Case N-225 is not required to be physically marked for traceability after fabrication. The following provides additional information with regard to this NRC concern.

The pipe support assemblies supplied by the General Electric, Nuclear Energy Division, for the Reactor Coolant Recirculation System have invoked and complied with the requirements of ASME Section III, Division I NA-3766.6 and code Case N-225. The component standard support material, supplied for the Reactor Coolant Recirculation pipe support assemblies in question is covered by General Electric, Nuclear Energy Division, Product Quality Certification No. QQ854, which certifies that the component support manufacturer, Bergen-Paterson Pipe Support Corp., has fabricated all components under a controlled quality assurance program in accordance with the Procurement Quality Requirements including applicable Codes, Standards and Specifications. Page 6 of PQC QQ854 contains Bergen-Paterson's Certificate of Compliance for the component standard support assemblies in question. The Certificate of Compliance specifically states that the material supplied complies with ASME Section III, subsection NF, and code Case N-225. It should be noted that ASME Section III, code Case N-225 states "All component support documentation furnished under the provisions of this Case shall be marked with this Case number". Bergen-Paterson's Certificate of Compliance has been marked with code Case N-225.

Therefore, sufficient evidence exists to demonstrate that the component standard support material supplied meets overall ASME Section III and General Electric requirements and is acceptable as built.

4. Response to Violation B, Example 1

The Commission was advised by NMPC during the July 16, 1984 meeting that substantial effort has been made to improve the ITT radiography program beyond review of the specific radiographic concerns included in the NRC CAT Inspection Report. NMPC also discussed the specific actions and programmatic changes which have been implemented to thoroughly address radiographic concerns. Furthermore, a re-review of 100% of pre-1983 ITT Grinnell radiographs has been conducted by an independent team of SWEC NDT Division personnel. This additional action provides assurance that sufficient attention is being given to rectify radiographic concerns.

5. Response to Violation A, Example 1

A subsequent review of the approximately 5700 E&DCRs issued in the seven months ending December 31, 1983 has established that less than 10% of design change documents were issued due to an error or missing information on a prior change. This is substantially lower than the NRC estimate included in the CAT Inspection Report. NMPC recognizes the importance of minimizing multiple changes and has taken steps to improve Project performance. These steps are listed below:

- a. SWEC has required that when a change document is to be cancelled or superseded, the same initiator should initiate the change Document. This practice is expected to encourage an individual to be as accurate as possible on the initial change document to reduce his need for preparing superseding documentation.

- b. The practice of revising E&DCRs by other E&DCRs has been stopped (with the exception of PGCC E&DCRs) as of June 1, 1984. An E&DCR requiring revision must be completely replaced by a superseding E&DCR.
- c. The SWEC Engineering Assurance Division has conducted training of engineering personnel on the correct identification of "reason codes" and the importance of correct identification of the reason codes. This is expected to make the indicated reasons for changing E&DCRs more accurate for use in trending.
- d. Small bore pipe and electrical conduit drawings are in the process of being transferred to the site for maintenance and updating. Pre-installation walk-downs have also begun. These actions are expected to limit the number of change documents.
- e. NMPC has transferred the plant's model to the site to provide information to support coordination of construction activities.

As noted in the May 4, 1984 letter responding to Violation C, Examples 2 & 3, NMPC has also taken steps to improve the posting of change documents.

Finally, teams of NMPC and SWEC personnel interviewed Construction, Quality Control, and Testing personnel, who actually work with the change documents, to determine whether users had difficulty comprehending work instructions. While certain enhancements are being made as a result of this review, major problems were not found with utilization of change documents associated with Stone & Webster drawings.

NMPC believes that the measures taken will provide additional assurance that the working level documents are clear to their users.