

August 28, 1984

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Re: Nine Mile Point Unit 1  
Docket No. 50-220  
Inspection Report 50-220/84-09

Dear Mr. Martin:

From May 29 through June 1, 1984, E. T. Shaub conducted a routine safety inspection at Nine Mile Point Unit 1, resulting in Inspection Report 50-220/84-09. That inspection identified one violation regarding Technical Specification 6.5.2.8.C. which calls for a semiannual Deficiency Audit to be conducted under the cognizance of the Safety Review and Audit Board. Our letter of July 20, 1984 responded to that inspection report.

Our response pointed out that the Safety Review and Audit Board Deficiency Audits will be expanded. During discussions between our respective staffs, your staff requested additional information specifying how our Deficiency Audit will be expanded.

In response to this request, the Deficiency Audits will be expanded to include sampling the documentation associated with the following four items:

1. Quality Assurance Procedure 16.40 "Control in Use of Nonconformance Reports;"
2. Quality Assurance Procedure 18.10 "Internal Audits" Section 5.6 "Audit Findings" and 5.7 "Follow-Up;"
3. Quality Assurance Procedure 10.21 "Performance, Reporting and Followup of Surveillance Activities for Operations" Section 5.8 "Corrective Action and Follow-Up;" and
4. Administrative Procedure No. 13 "Procedure for Control of Station Corrective Repair and Maintenance."

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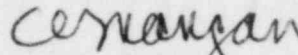
These additions to the scope of the audits will begin with the next scheduled semiannual Safety Review and Audit Board Deficiency Audit.

Our previous letter also indicated that the Nine Mile Point Unit 1 Safety Review and Audit Board reviews Licensing Event Reports and their associated Occurrence Reports. Moreover, the Safety Review and Audit Board reviews our Site Operations Review Committee Meeting Minutes. Since the Site Operations Review Committee reviews Occurrence Reports, our Safety Review and Audit Board indirectly reviews Occurrence Reports. Therefore, we do not intend to include reviewing these reports again in the Deficiency Audit.

In addition to the improvements to the Deficiency Audit, we have also submitted a Technical Specification Amendment Application (August 7, 1984) deleting the word "all" from Technical Specification 6.5.2.8.C. The Specification would, therefore, more accurately describe the audit methods of the Board, if this proposed amendment were approved.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION



C. V. Mangan  
Vice President

Nuclear Engineering and Licensing

DAC/bd

REC'D 31 AUG 30 1984  
Nuclear Engineering