



NIAGARA MOHAWK POWER CORPORATION / 300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202 / TELEPHONE (315) 474-1511

September 7, 1984  
(NMP2L 0154)

Mr. R. W. Starostecki, Director  
Region I  
Division of Project and Resident Programs  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Nine Mile Point Unit 2  
Docket No. 50-410

Dear Mr. Starostecki:

Enclosed is our detailed response to the Notice of Violation date August 6, 1984 and the accompanying Inspection Report No. 50-410/84-09.

Very truly yours,

C. V. Mangan  
Vice President  
Nuclear Engineering & Licensing

CVM/GG/pbd  
Enclosure

xc: R. A. Gramm, Resident Inspector  
Project File (#0136H)

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NIAGARA MOHAWK POWER CORPORATION  
NINE MILE POINT UNIT #2  
DOCKET No. 50-4100

Response to Notice of Violation  
Attached to NRC Inspection Report  
No. 50-410/84-09

The first violation was identified as follows:

Violation 1:

10 CFR 50, Appendix B, Criterion XVI and the Nine Mile Point, Unit 2 PSAR state that conditions adverse to quality shall be analyzed for root cause identification and for recommendation of corrective actions to preclude the recurrence of the adverse conditions. Stone and Webster Engineering Corporation procedure QCI-16.01 "Short Term Trend Analysis" established a system to analyze and correct adverse trends identified during first line inspection activities.

Contrary to the above, on June 15, 1984, the licensee was informed that review of Stone and Webster Engineering Corporation data contained within monthly Field Quality Control reports indicate that adverse trends identified during first line inspection activity have not been adequately corrected to prevent recurrence. Excessive inspection reject rates within the electrical; Heating Ventilating and Air Conditioning; preventive maintenance and equipment storage areas were documented to have been recurring over a seventeen month period.

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

The following is submitted in response to this violation:

Niagara Mohawk believes that the principal basis of this violation is the lack of pertinent data to judge the effectiveness of corrective action related to our short term trending program. Niagara Mohawk has determined that the trending program, as defined by procedure QCI-16.01, has two weaknesses. First, there is no clear definition of what constitutes a negative or positive trend. Secondly, there are not adequate requirements for documentation of the trends identified for analysis and their subsequent disposition.

As a result of these deficiencies, it appears that the inspector has used the data in the Field Quality Control Monthly Report to conclude that our corrective actions are not adequate. Niagara Mohawk believes that judgements of program effectiveness based on the Field Quality Control Monthly report may be misleading. Commodity reject rates contained in this report provide a general overview of process control which is not limited to initial fabrication. This report is not used as part of the Field Quality Control trending program since actual commodity reject rates are distorted because:

- a. Data resulting from inspection of incomplete installation are included in the report;
- b. Data resulting from reinspection of previously accepted initial fabrication are included in the report;

- c. Some storage and housekeeping deficiencies are reported with their associated commodity; and
- d. Some percentages may be based on less than statistically significant data.

Niagara Mohawk believes that proper judgement of the effectiveness of the corrective action program to reduce reject rates requires a comparison between past and recent performance over several months. On this basis, Niagara Mohawk believes its program has been effective in reducing reject rates. For example, our evaluation, comparing the last 8 months of 1983 with the first 7 months of 1984, shows that electrical cable terminations reject rates declined from 27% in 1983 to 15% in 1984; electrical exposed raceway reject rates declined from 23% in 1983 to 8% in 1984; and electrical cable pull reject rates declined from 16% in 1983 to 12% in 1984. The only electrical work activity identified in the inspection report that has not improved in 1984 has been electrical equipment installation, and the reject rate for this activity reflects the planned incomplete status of many installations rather than process deficiencies.

#### Corrective and Preventative Actions

Procedure QCI-16.01 will be revised to include a definition of trending and to require documentation of trends identified for analysis and resulting disposition.

Niagara Mohawk will re-evaluate the effectiveness of the trending program using the revised procedure QCI-16.01.

Schedule

Procedure QCI-16.01 will be revised by October 12, 1984. The program re-evaluation will be performed by January 30, 1985.

Violation 2:

10 CFR 50, Appendix B. Criterion V and the Nine Mile Point, Unit 2 PSAR state that quality activities shall be performed in accordance with the appropriate documented procedures and drawings. Stone and Webster Engineering Corporation Specification E-21P "Electrical Penetrations" requires that electrical penetration assemblies receive non-destructive examination inspections by radiography and surface examination techniques. Chicago Bridge and Iron Co. (CB&I) drawing 434-1 further defines the requisite radiographic and magnetic particle examinations and states that CB&I is to perform the required non-destructive tests. Stone and Webster Engineering Corporation telex 12177/10239 instructs CB&I to perform all required examinations on the electrical penetrations.

Contrary to the above, on June 15, 1984, the licensee was informed that CB&I inspection records for electrical penetrations Z-201 through Z-210 document that CB&I did not perform the requisite magnetic particle

examination for the total weld connecting the twelve inch pipe to the weld neck flange, but had only examined weld repair areas.

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

The following is submitted in response to this violation:

Chicago Bridge & Iron as-built drawing No. 434 requires 100% magnetic particle and radiographic examination of welds. Chicago Bridge & Iron did perform the required radiographic examination but performed magnetic particle examination only on weld repair areas. This violated Chicago Bridge & Iron's Quality Assurance requirement to perform inspections/operations in accordance with approved drawings.

The non-destructive examinations required by code and specification were performed, however, since Graver Northeast had previously performed the required surface examinations.

#### Corrective Action

No corrective action is considered necessary since the non-destructive examinations required by code and specification have been performed satisfactorily.

#### Preventive Action

No further action is considered necessary since all work under the Chicago Bridge & Iron contract has been completed.