

APPENDIX A

NOTICE OF VIOLATION

Niagara Mohawk Power Corporation
Nine Mile Point Unit 2

Docket No. 50-410
License No. CPPR-112

As a result of the inspection conducted on June 18-July 27, 1984 and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984 (49 FR 8583), the following violations were identified:

1. 10 CFR 50 Appendix B, Criterion V and the Nine Mile Point, Unit 2 PSAR, Section 17.D.3.6., require that activities affecting quality be prescribed by and accomplished in accordance with the appropriate instructions, procedures, or drawings. Stone and Webster Engineering Corporation (SWEC) Specification P301X details specific requirements for the installation of the Omni Restraints and provides for SWEC approval of ITT Grinnell procedures which control restraint erection and QC verification of the erection process. ITT Grinnell Procedure P301X-ITT-G1 delineates the Omni Restraint installation process and Procedure FOCR 4.2-34 specifies Quality Control Hold Points to be verified during this restraint installation process.

Contrary to the above, as of July 25, 1984, an activity affecting the quality of the Omni Restraints was not accomplished in accordance with the appropriate procedures, in that certain shim material was cut without the P301X-ITT-G1 procedurally required report to engineering of side gap dimensions and without the FOCR 4.2-34 procedurally required hold point verification steps.

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

2. 10 CFR 50 Appendix B, Criterion III and the Nine Mile Point, Unit 2 PSAR, Section 17.D.3.4, require that design changes be subject to design control measures, which include assurances that the design bases are correctly translated into specifications, drawings, procedures, and instructions and that materials, parts, equipment, and processes are suitable for their application to the design. Stone and Webster Engineering Corporation (SWEC) is authorized to implement design changes through various means, to include direct revision of a specification or drawing or issuance of an Engineering and Design Coordination Report (E&DCR). Properly controlled and issued E&DCR's list those design documents affected by the design change.

Contrary to the above, as of July 27, 1984, the established SWEC design change control measures failed, in three separate cases, to provide the correct translation of design information into specifications or drawings, in that:

- 1) E&DCR F01632A was issued without revising the affected specification, resulting in conflicting information provided to the installer.
- 2) E&DCR F11411 issued incomplete drawing revision details, resulting in a final installed field configuration, contrary to design.

- 3) Drawings EV-41A & EV-60A, in conjunction with Specification P283B, failed to provide all applicable material requirements, resulting in the installation of bolting material which had not been reviewed for suitability in the design process.

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

Pursuant to the provisions of 10 CFR 2.201, Niagara Mohawk Power Corporation is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement of explanation in reply including: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending time.