



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

November 9, 1984  
(NMP2L 0232)

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

Re: Nine Mile Point - Unit 2  
Docket No. 50-410

Dear Mr. Starostecki:

Enclosed is our detailed response to the Notice of Violation dated October 10, 1984 and the accompanying Inspection Report No. 50-410/84-13.

Very truly yours,

C. V. Mangan  
Vice President  
Nuclear Engineering and Licensing

CVM/GG/dd

Enclosure

xc: R. A. Gramm, NRC Resident Inspector  
Project File (#0447H)

8411200089 841109  
PDR ADOCK 05000410  
Q PDR

I E01  
1/1

NIAGARA MOHAWK POWER CORPORATION  
NINE MILE POINT - UNIT 2  
DOCKET NO. 50-410

Response to Notice of Violation  
attached to NRC Inspection Report No. 50-410/84-13

Violation 1:

10CFR50, Appendix B, Criterion X and XV, and the Nine Mile Point, Unit 2 PSAR, Sections 17.D.3.11 and 17.D.3.16, require that an inspection program be implemented to verify the conformance of hardware installations to design requirements and further that instances of nonconforming conditions shall be identified for evaluation and disposition in accordance with established procedures. Stone and Webster Engineering Corporation procedure QS 15.1 defines the nonconformance and disposition report to be the appropriate vehicle to document situations in which engineering evaluation and disposition is required.

Contrary to the above, the licensee was informed on September 6, 1984, that inadequate vendor inspection had been conducted on the ASME Service Water strainers 4A through 4F as the strainer top bolts were not fully engaged in accordance with ASME ND-4711 and the component N-2 data reports. The nonconforming condition had been identified to Stone and Webster Engineering Corporation and an erroneous disposition had been provided by engineering on an interoffice correspondence in lieu of the requisite nonconformance and disposition report.

This is a Severity Level IV Violation (Supplement II0).

The following is submitted in response to this violation:

ASME Section ND-4711 states "the threads of all bolts or studs shall be engaged in accordance with the design." The Service Water Self-Cleaning Strainer design assumed full thread engagement for the cover bolting. Full thread engagement could not be achieved with the bolts installed on the strainers.

The documentation checklist accompanying Zurn Industries design drawing I-770207-A Rev. C identifies the cover bolts as 7/8-9X5 1/4" HHCS SA193 B7. The bolts supplied with the strainers were in accordance with the documentation checklist. The N-2 data report, however, conflicts with the documentation checklist in that 5 1/2" long bolts were identified.

Zurn's Quality Assurance Program, the Authorized Nuclear Inspector and Stone & Webster's Procurement Quality Assurance failed to identify that the installed bolting material could not provide full thread engagement. In addition, the discrepancy between the N-2 data report and the design document was not identified.

The lack of full thread engagement was brought to the attention of Stone & Webster Site Engineering Group by ITT Grinnell. At that time, the Stone & Webster field engineer conducted a review of design documents available on site for construction and responded to ITT Grinnell with an interoffice correspondence. As noted above, the bolts in question were in accordance with the design document, and consequently the condition was not recognized as nonconforming.

#### Corrective and Preventive Action

Nonconformance and Disposition Report No. 8974 has been issued to document the discrepancy between the N-2 data report and the strainer cover bolts as well as the lack of full thread engagement. The Nonconformance & Disposition Report has been dispositioned "accept-as-is" for the lack of thread engagement based on revised design calculations which show that the thread engagement achieved is satisfactory for the specified service. The N-2 data report will be revised to reflect the acceptable bolts.

Stone & Webster Procurement Quality Assurance will add an inspection attribute to inspection plans for mechanical equipment to require verification of thread engagement. Stone & Webster Field Quality Control has revised the inspection plan for mechanical equipment installation to include an attribute for fabrication verification.

#### Schedule

Full compliance will be achieved by January 1, 1985.

#### Violation 2

The Notice of Violation specifically indicates that no written response is required at this time due to Niagara Mohawk's extensive corrective actions during the conduct of Inspection No. 84-13.