

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-410/85-01

Docket No. 50-410

License No. CPPR-112 Priority -- Category B

Licensee: Niagara Mohawk Power Corporation

300 Erie Boulevard West

Syracuse, New York 13202

Facility Name: Nine Mile Point Nuclear Station Unit 2

Inspection At: Scriba, New York

Inspection Conducted: January 15-18, 1985

Inspectors: L. Briggs 2/22/85
L. Briggs, Lead Reactor Engineer date
S. Hudson 2/22/85
S. Hudson, Senior Resident Inspector date
Nine Mile Point Unit 1

Approved by: L. Bettenhausen 2/25/85
L. Bettenhausen, Chief, Test Programs date
Section

Inspection Summary: Inspection on January 15-18, 1985 (Report No. 50-410/85-01)

Areas Inspected: Routine, unannounced inspection by one region based and one senior resident inspector (45 hours) of the preoperational test program, QA/QC interface with the preoperational test program, preoperational test program implementation and plant tours.

Results: No violations were identified.

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DETAILS

1. Persons Contacted

- *R. Abbott, Station Superintendent
- *G. Afflerbach, Startup Manager
- *W. Baker, Special Projects
- *P. Belhumeur, Startup QA Manager
- *B. Bulger, Startup and Test - Project Advisory Engineer (SWEC)
J. Gallagher, Site Engineering Group, Licensing Engineer
- *S. Geier, Nuclear Compliance and Verification Engineer (SWEC)
C. Millian, Lead Senior Nuclear Compliance and Verification Engineer
- *J. Orlando, Supervisor Test Activities, Startup QA
- *D. Palmer, Manager, QA Nuclear
- *M. Ray, Manager, Special Project
- *C. Terry, Project QA Manager (SWEC)
- *J. White, Special Projects

Other NRC Personnel Present

- *R. Gramm, Senior Resident Inspector, Nine Mile Point Unit 2
- *S. Hudson, Senior Resident Inspector, Nine Mile Point Unit 1
- *R. Wheeler, Resident Inspector, Nine Mile Point Unit 2

*Denotes those present at the exit meeting conducted on January 18, 1985.

2. Preoperational Test Program Review

2.1 Scope

The inspector began initial review of the licensee's preoperational test program to verify conformance with licensee commitments contained in the Final Safety Analysis Report (FSAR), Chapter 14 and Regulatory Guide (RG) 1.68, Initial Test Programs for Water Cooled Nuclear Power Plants. Specifically, the review was conducted to verify that formal administrative measures had been established to control the conduct of preoperational testing including:

- A description of the preoperational test program and assignment of responsibilities;
- A method to control turnover of systems from the constructor to the startup department;
- A listing of preoperational tests of systems addressed in RG 1.68;

- A formal method to control preoperational test procedure format, content, review and approval and changes to procedures;
- A formal method to control interruption of testing and retest requirements;
- A formal method to control calibration and issuance of measuring and test (M & T) equipment;
- A method to control lifted leads, jumpers, safety tagging and temporary modification; and
- Delineation of start-up QA/QC responsibilities.

2.2 Findings

The nineteen Startup Administrative Procedures (SAP) listed in Attachment A were reviewed. The inspector found that, for those procedures reviewed, the commitments identified in Paragraph 2.1 above were met.

The inspector also performed a preliminary comparison of the Pre-operational Test (POT) Procedures identified in Table 14.2-1 of the FSAR to the guidance of RG 1.68, Revision 2. At present, the licensee is proposing certain FSAR revisions that will affect the preoperational test program. A detailed comparison will be conducted during a future inspection when the full extent of any changes are known. The preliminary review indicated that the licensee was currently meeting the guidance of RG 1.68.

The inspector noted during the review that there was no written SAP to address the preventive maintenance program that would be conducted by the startup department after a system was turned over to them from the constructor. When questioned, the licensee stated that a SAP was being drafted to address the startup preventive maintenance (PM) program. During the interim period, the constructor will continue the PM program on any equipment released or turned over. This item is further discussed in Paragraph 5 of this report.

3. Preoperational Test Procedure Review and Verification

During this inspection the licensee reviewed and approved four pre-operational test procedures for performance. Those procedures were not yet available for NRC review. This area will be reviewed throughout the preoperational test program during routine inspections. The inspector had no further questions at this time.

4. QA/QC Interface with Preoperational Test Program

The inspector reviewed four recent startup Quality Assurance Surveillance Reports (QASR) regarding different activities of the licensee's startup group. The following QASR's were reviewed:

- QASR 2S-0008-84, Verification of Preliminary Testing of Miscellaneous Floor Drains system Piping, Valves and Pumps, completed December 7, 1984. Testing was conducted under generic procedure MP.GENE.001, Revision 3. The QA inspector witnessed several portions of the testing. No deficiencies were identified.
- QASR 2S-0018-84, Preliminary Load Testing of Emergency DC Distribution Charger 2BYS*CHGR 2A1, completed December 21, 1984. Testing was conducted under generic procedure EE.GENE.004, Revision 3. The charger tested satisfactorily with no identified deficiencies.
- QASR 2S-0019-84, Verification of Preliminary Testing of Normal AC Distribution (600 VAC), Transformer and Regulator 2SCI-Pnl., completed on December 27, 1984. Testing was conducted using generic procedures EG.GENE.001, Revision 3, EE.GENE.006, Revision 3 and ED.GENE.008, Revision 2. All tests were conducted satisfactorily with no identified deficiencies.
- QASR 2S-0001-85, System Walkdown of Makeup Water Treatment System, completed on January 8, 1985. The walkdown was conducted under Startup Administrative Procedure (SAP) N2-SAP-107B, System Turnover, Revision 0. The makeup water treatment system is the first system to undergo the turnover process at the facility. During the QA walkdown 32 deficiencies were noted that had not been identified on the Master Tracking System (MTS) list as required by N2-SAP-107B. Most items concerned permanent component identification tags and five temporary modifications not listed on the MTS. The QA walkdown also identified two strainer drain valves that were not installed and not identified on the MTS. The QA inspector issued Corrective Action Request (CAR) SU-85-001 to correct the identified deficiencies. Corrective action was in progress at the end of this NRC inspection on January 18, 1985 and will be reviewed during future inspection.

No violations were identified.

5.0 Preoperational Test Program Implementation

The licensee's Startup Administrative Procedure N2SAP-107A, System Release, Revision 0, dated 12/11/84 provides the administrative controls by which systems or portions of systems as defined by the boundary identification package are released from SWEC construction organization to NMQC Startup and Test for pre-operational testing.

5.1 Findings

The inspector reviewed release packages A-100.A03 for the standby diesel generator air system and A-100.A01 for the standby diesel generator EGI to verify the implementation of SAP-107A. Two of the items that are required to be reviewed prior to system release are outstanding SWEC danger tags and outstanding temporary modifications. Although the release package for the diesel air system included a signed statement that there were no outstanding SWEC danger tags, it did not contain the same type of negative declaration regarding temporary modifications. Discussions with the system startup engineer indicate that a check for temporary modifications had been conducted and that none were installed. The licensee stated that future release packages would contain a statement regarding the status of temporary modifications and SWEC danger tags. This positive action will help ensure that these items are reviewed. Both release packages were found to meet the licensee's administrative controls.

The inspector learned that the licensee intended to have SWEC continue to perform preventative maintenance (PM) on the equipment after it has been released to NMPC. The PM program is the approved program that was used during the construction phase. The licensee is preparing a Startup Administrative Procedure to address PM's after the systems are turned over to NMPC. The inspector verified that the SWEC personnel responsible for the PM program are aware that they are to continue their activities.

No violations were identified.

6. Plant Tours

The inspector, accompanied by the Senior Resident Inspector, toured the facility to become familiar with plant design and location of various structures and components. The inspector observed work in progress, housekeeping and cleanliness control and the status of construction activities.

No violations were identified.

7. Entrance and Exit Interview

A management meeting was held at the beginning of the inspection on January 15, 1985 to discuss the NRC's preoperational test program and policy. During the meeting the inspector discussed the topics that had been previously covered during the August 7, 1984 meeting with the licensee at the NRC Region I office. The meeting was beneficial to the licensee and the inspector in resolving several questions and establishing working relationships for the preoperational test program.

A subsequent management meeting was held at the conclusion of the inspection on January 18, 1984 to discuss the inspection scope and findings as detailed in this report (see Paragraph 1 for attendees). No written information was provided to the licensee at any time during the inspection.

Attachment A

Startup Administrative Procedures Reviewed

<u>PROCEDURE NUMBER</u>	<u>PROCEDURE TITLE</u>	<u>REV. No.</u>	<u>APPROVAL DATE</u>
N2-SAP-6	Qualification and Certification of Test Personnel	1	02/06/84
N2-SAP-100	Start-up and Test Program Description and Organization	2	12/10/84
N2-SAP-102	Joint Test Group	1	12/10/84
N2-SAP-103	Quality Assurance and Control	0	12/18/84
N2-SAP-105	Test Index	0	12/10/84
N2-SAP-106A	Test Procedure Format	1	11/26/84
N2-SAP-106B	Test Procedure Review, Approval and Revision	1	12/10/84
N2-SAP-106C	Conduct of Testing	0	12/11/84
N2-SAP-107A	System Release	0	12/11/84
N2-SAP-107B	System Turnover	0	12/11/84
N2-SAP-109	Qualification and Certification of Startup and Test Personnel	0	12/11/84
N2-SAP-110	Training of Start-up and Test Personnel	0	12/10/84
N2-SAP-113	Safety Tagging and Markups	0	12/11/84
N2-SAP-115	Control of Measuring and Test Equipment	0	12/11/84
N2-SAP-118	Temporary Modifications	0	12/11/84
N2-SAP-121A	Deficiency Reporting System	0	12/12/84
N2-SAP-121B	Deficiency Tracking System	0	12/11/84
N2-SAP-127	System Test Matrix	0	12/10/84
N2-SAP-129	Boundary Identification Package	0	12/18/84