

October 17, 1984
(NMP2L 0204)

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:

On August 31, 1983, Niagara Mohawk submitted a final report in accordance with the provisions of 10CFR50.55(e) documenting the identification by Stone & Webster Engineering Corporation of Field Quality Control Inspectors who had performed inspections in areas for which they were not formally certified. The investigation, which resulted in the identification of this concern, was initiated in response to the findings identified in Nuclear Regulatory Commission Inspection Report No. 82-13. A followup investigation, which involved a review of inspections dating back as far as September 1981, has now been completed. The results of this investigation are contained in the attached report.

As you will note, the investigation has established that the identified deficiencies, had they remained undiscovered, would not have affected the safe operation of the plant. Preventive actions are identified in our letter of June 30, 1983.

Very truly yours,

C. V. Mangano

C. V. Mangano
Vice President

Nuclear Engineering & Licensing

TL:ja
Attachment
xc: Project File (2)

R. Gramm, NRC Resident Inspector

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

Supplemental Report for a Problem
Concerning Uncertified Field Quality Control Inspectors

The initial list of uncertified inspectors was identified in a Niagara Mohawk Power Corporation investigation conducted in response to the findings identified in Nuclear Regulatory Commission Inspection Report 82-13. The corrective actions to this problem are discussed in the June 30, 1983 Niagara Mohawk response to the "Notice of Violation and Proposed Imposition of Civil Penalty" (which was transmitted to Niagara Mohawk from the Administrator of Region I on April 26, 1983).

This report describes additional uncertified FQC inspectors that were not reported in the final 10CFR50.55(e) report submitted August 31, 1983.

1. Description of the Problem

An inspector was identified as having performed rigging and handling inspections for which he was not certified, as evidenced by the initials in blocks 66-68 of Inspection Report Nos. M1009322, M1009350 and M1009351 dated December 1, 7 and 7, 1981, respectively.

Analysis of Safety Implications

These three inspections were performed in the presence of a certified Level II inspector as a method of on-the-job training, which is substantiated by a written statement received from the certified inspector.

Although the signing of the formal inspection reports by an individual receiving on-the-job training is a deficiency, a certified Level II inspector was present during the inspections; therefore, this condition would not adversely affect the safe operation of the plant.

2. Description of the Problem

An inspector was identified as having performed receipt inspections for which he was not certified. A total of nine inspections were performed that involved 583 items and are documented on the following inspection reports:

<u>Inspection Report Number</u>	<u>Specification</u>	<u>Date Issued</u>
M1001806	P304V	12/19/81
I1001768	P800A	12/12/81
I1001745	JA	12/5/81
I1001740	JA	12/5/81
I1001742	P800A	12/5/81
I1001743	P800A	12/5/81
I1001744	P800A	12/5/81
I1001746	P800A	12/5/81
I1001741	P800A	12/5/81

Analysis of Safety Implications

All of the items documented on these inspection reports had been released from the supplier's shop after inspection by a Procurement Quality Assurance representative of Stone & Webster Engineering Corporation or General Electric. The inspections that were performed consisted of six attributes:

- a. Documentation
- b. Shipping Damage
- c. Cleanliness
- d. Protective Covers/Seals
- e. Assigned Storage Levels
- f. Identification

The above inspections performed by the inspector document that 158 items were unsatisfactory, of which 152 items were subsequently reworked and reinspected by a certified inspector, and the remaining six items were upgraded to a nonconforming status and documented in Nonconformance & Disposition Report No. 3250.

The inspector had approximately 9-1/2 years of inspection experience prior to performing these inspections. He had been certified as a Level II inspector with Stone & Webster Engineering Corporation since June 1978 in the mechanical discipline. Additionally, the inspector had received training in the area of these inspections, which included eight hours of on-the-job training.

Although the inspector was not certified in receipt inspections, he was certified as a Level II inspector in the contract monitoring discipline on August 1, 1981. The duties performed by the inspector in this discipline included surveillance of the contractor's receiving activities, as evidenced on Type C Inspection Report No. MIG00041 dated August 24, 1981.

In order to obtain additional assurance of the subject inspections, a certified Level II inspector performed a review of 151 of the items previously documented on the Inspection Reports identified above utilizing the same attributes. The results of the review were satisfactory.

Although a deficiency existed in that the inspector was not formally certified to perform the identified inspections, based on the above explanation (which includes a partial review of the inspector's findings), it would not have adversely affected the safe operation of the plant.

3. Description of the Problem

An inspector generated one cadwelding inspection report (No. S1017294) on October 31, 1981, for which he was not certified.

Analysis of Safety Implications

The inspector completed the required readings on August 1, 1981 and had received 58 hours of on-the-job training (for cadwelding) prior to October 31, 1981. The inspection involved verifying the sleeve type, identification, bar centering marks, check for voids and slag and cadwelder qualification. Considering the basic inspection attributes for cadwelding and the fact that he was a certified Level I inspector (August 12, 1981) in concrete placement and had received 58 hours of on-the-job training in cadwelding, this deficiency would not have adversely affected the safe operation of the plant.

4. Description of the Problem

An inspector generated one testing of concrete inspection report (No. S1016442) on September 28, 1981, in which his initials appear in blocks 66-68. The inspector was not certified in testing of concrete.

Analysis of Safety Implications

Although the inspector was not certified in testing of concrete, the Inspection Report was cosigned by a certified Level II inspector, and a statement was provided that when performing the laboratory work, he was under direct supervision; therefore, this deficiency would not have adversely affected the safe operation of the plant.

5. Description of the Problem

An inspector performed two inspections, one for vermiculite (No. S1017018) on October 20, 1981, and one for concrete placement (No. S1017520) on November 11, 1981, in which his initials appear in blocks 66-68. The inspector was not certified in these areas.

Analysis of the Safety Implications

Both inspection reports were cosigned by a certified Level II inspector, and a statement was provided that, when performing the inspections, the inspector in question was under direct supervision; therefore, this deficiency would not have adversely affected the safe operation of the plant.

6. Description of the Problem

An inspector generated three receiving inspection reports (Nos. M1001412, M1001396 and M1001484) on September 29, 25 and October 14, 1981, respectively, for which he was not certified. His certification was to perform receipt inspections of "source-inspected equipment/material," i.e., Stone & Webster Engineering Corporation Procurement Quality Assurance inspected items and not General Electric source-inspected equipment/material.

Analysis of Safety Implications

Both of these activities are covered by Stone & Webster Quality Assurance Inspection Plan No. N20QAD77FA001 under "materials/equipment source inspected," and require inspection of identical generic attributes.

The major difference between these two inspection activities is the documentation received.

The documentation for the identified inspection reports was re-reviewed and found acceptable on December 29, 1983.

Based on the re-review of the documentation, this deficiency would not have adversely affected the safe operation of the plant.

7. Description of the Problem

An inspection supervisor generated one in-process coatings inspection report (No. S1016660) on September 15, 1981, one day prior to his certification at Nine Mile Point Unit 2.

Analysis of Safety Implications

The inspection supervisor performed an inspection one day prior to his formal certification which does constitute a deficiency; however, based on his experience and prior certification in coatings at another plant (the inspection supervisor was previously certified Level II in coatings on March 20, 1981 at another plant), the deficiency would not have adversely affected the safe operation of the plant.

8. Description of the Problem

A senior inspector generated one studwelding inspection report (No. S1016751) on October 10, 1981, for which he was not certified.

Analysis of Safety Implications

The senior inspector has been AWS certified since November 1979; part of this certification is Section 4, Part F, on studwelding. In addition to his AWS certification, he has been a certified Level II structural inspector since January 24, 1977. This certification included studwelding as it pertained to structural steel erection.

Based on the senior inspector's prior experience and certifications, this deficiency would not have adversely affected the safe operation of the plant.

9. Description of the Problem

An inspector generated one prequalification studwelding inspection report (No. S1016142) on September 14, 1981, one coatings inspection report (No. S1017182) on October 26, 1981 and one application inspection report (No. S1017181) on October 26, 1981, for which he was not certified.

Analysis of Safety Implications

In the case of Inspection Report No. S1016142, the inspector had received ten hours of on-the-job training and had been a certified Level II inspector in the civil/structural discipline since November 10, 1980. In addition, the inspector had accumulated six years, eight months experience as an inspector/technician for Pittsburgh Testing Laboratories in civil/structural, for which he was certified Level I in that

discipline in April 1979. Based on the inspector's experience, his Level II certification in civil/structural, the nature of basic inspection attributes performed (equipment setup, stud cleanliness, operator qualification, base metal preparation, preproduction testing, preheat, arc shields and a bend test), this deficiency would not have adversely affected the safe operation of the plant.

In the case of Inspection Report No. S1017182, the coatings inspection report was a finish coat for beam ends which has the surface preparation record and the coatings record attached and cosigned by a certified Level II inspection supervisor for that inspection.

Inspection Report No. S1017181 was generated on the same day as the Inspection Report noted above and was an in-process inspection performed at the paint shop for miscellaneous electrical supports. Based on the type of inspections performed and the Inspector's Level II certification as an inspector in the civil/structural discipline, the deficiencies would not have adversely affected the safe operation of the plant.

10. Description of the Problem

Four inspectors were identified as having performed storage inspections for which they were not certified. A total of six inspections were performed and documented as follows:

<u>Inspector</u>	<u>Inspection Report No.</u>	<u>Date Issued</u>
Inspector A	P1009230	10/29/81
	P1009279	11/16/81
Inspector B	W1009312	11/25/81
	W1009299	11/20/81
Inspector C	M1009373	12/18/81
Inspector D	M1009145	9/18/81

Analysis of Safety Implications

Further evaluation of the certifications of the four individuals has revealed the following:

- a. Although Inspector A and Inspector B were not certified in storage inspections, both were certified as Level II inspectors in contract monitoring prior to the performance of the inspections. This certification allows the inspector to perform surveillance of contractors' work activities to ensure compliance to their quality assurance program and verify compliance to specification requirements.
- b. At the time of Inspector C's and Inspector D's inspections, they were certified as Level II and Level I, respectively, in the mechanical discipline, in which they were working. The inspections that were performed by both inspectors were of equipment/materials which would fall within their area of assigned responsibility for installation.

In view of the above, it is our conclusion that the inspectors in question had sufficient training and/or experience to perform their inspections and are considered qualified but not formally certified; therefore, this deficiency would not have adversely affected the safe operation of the plant.

11. Description of the Problem

An inspector performed inspections of stud welding operations for which he was not certified. These inspections were documented in Inspection Report Nos. E2006689 and E2006690 on March 29 and January 16, 1982, respectively. The work documented on these inspection reports could not be reinspected due to inaccessibility and was subsequently documented on Nonconformance and Disposition Reports Nos. 4969 and 5315.

Analysis of Safety Implications

Both Nonconformance and Disposition Reports were dispositioned accept-as-is on the basis that the inspector was a certified ANSI Level II inspector for AWS D1.1 visual weld inspections and inspection of this work by Construction was also documented as satisfactory.

Although the inspector was not formally certified for the inspections performed, based on the above, this deficiency would not have adversely affected the safe operation of the plant.

12. Description of the Problem

An inspector performed inspections (Nos. E2006058 and E2006078) dated February 19, 1982 of stud welding and support welds for which he was not certified.

Analysis of Safety Implications

The work in question has since been reinspected by a certified inspector. Within the scope of the reinspections of the previous work, two inspection reports (Nos. S3043785 and S3043929) document satisfactory results. One inspection report (No. S3043771) identified three unsatisfactory welds. An engineering evaluation has since determined that the welds would not have resulted in an overstressing. The welds have been reworked. Therefore, if this problem were to have remained uncorrected, it would not have adversely affected the safe operation of the plant.

13a. Description of the Problem

Two inspectors performed an equipment installation inspection (No. E2009646) on September 16, 1982 for which they were not certified.

Analysis of Safety Implications

The work was reinspected in February 1983 by a certified inspector and was found satisfactory. The inspections were documented on Inspection Reports Nos. E3005282, E3005289 and E3005359.

Although these two inspectors were not formally certified for the inspection performed, based on the reinspections, this deficiency would not have adversely affected the safe operation of the plant.

13b. Description of the Problem

An inspector also performed one equipment installation inspection (No. E2009474) on September 9, 1982 for which he was not certified. The report was cosigned by a certified Level II inspector.

Analysis of Safety Implications

This work has since been reinspected by a properly certified inspector and has been found to be satisfactory. The reinspection results were documented on Inspection Report No. E3006485.

Although the inspector was not formally certified for the inspection, based on the reinspection, this deficiency would not have adversely affected the safe operation of the plant.