

OCT 19 1984

Docket No. 50-410

Niagara Mohawk Power Corporation  
ATTN: Mr. B. G. Hooten  
Executive Director  
Nuclear Operations  
c/o Miss Catherine R. Seibert  
300 Erie Boulevard, West  
Syracuse, New York 13202

Gentlemen:

Subject: Inspection No. 50-410/84-08

This refers to your letter dated September 7, 1984, in response to our letter dated August 8, 1984, and to the telephone discussions on September 21 and 24, 1984, between Mr. C. Beckham, et al, of your staff and Messrs. J. P. Durr and H. Kerch of my staff.

In your response to Violation "A" of our August 8, 1984, letter, you stated that there is no code requirement to record acceptable discontinuities or indications. We direct your attention to ASME Code Interpretations III-1-78-07 and III-80-26. In this case, the ASME Code, Section III, is the governing Code and has jurisdictional authority over the piping. These interpretations both require that "all acceptable linear indications be recorded and dispositioned."

We understand that you have implemented additional radiographic film reviews of all ITT Grinnell shop and field radiographs taken before 1983 for the cited condition. Further, you will initiate a 100% review of all similar films taken between 1983 and January 1984. Lastly, all films taken after January 1984 will be sampled to assure continued compliance. These supplementary programs will begin on October 1, 1984.

As discussed in our telephone conversations, we have noted two technical errors on page 6 of your response to Violation "C" wherein the text should read:

- "It is not normal construction practice to perform additional thickness checks during erection ..."
- "Therefore, it is Niagara Mohawk's position that if there is no change in density on the radiograph, then the weld thickness is within design limits."

With the foregoing changes, we agree with the technical arguments. However, as noted, this leads to the conclusion that if acceptable pipe wall thickness is supplied by the manufacturer/fabricator and weld radiographic density is within the allowed minus 15, plus 30% requirement, then welds which are less than piping specification minimum wall requirements can be unknowingly accepted.

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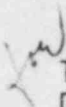
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This matter will be examined in greater detail by the NRC during our final review and resolution on the above findings.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:  
Stewart D. Ebnetter




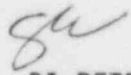
Thomas T. Martin, Director  
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