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

February 11, 1986 (NMP2L 0607)

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 January 10, 1986 and accompanying Inspection Report 85-36.

Very truly yours,

Comarcar

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C. V. Mangad Senior Vice President

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Enclosure xc: Director of Inspection and Enforcement U.S. Nuclear Regulatory Commission Washington, DC 20555

R. A. Gramm, Resident Inspector

Project File (2)

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

Response to Notice of Violation Attached to NRC Inspection Report No. 50-410/85-36

Violation:

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As a result of the inspection conducted October 21, 1985 to November 26, 1985 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 violation was identified.

10 CFR 50, Appendix B, Criterion X and the Nine Mile Point Unit 2 PSAR, Appendix D.3 require that inspections be performed to verify installation conformance to design drawings. Electro-Mechanics drawings 42450G and 42453 depict the Remote Shutdown Panel Assembly details. The drawings specify one-half inch bolts for the Unistrut connections.

Contrary to the above, on November 12, 1985, Remote Shutdown Panel 2CES*PNL405 was found not in conformance with drawings 42450G and 42453 as undersized bolting hardware had been installed for the Unistrut connections, and the undersized bolts had been accepted by Stone & Webster Procurement Quality Assurance.

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

Response:

In addition to the cited condition identified in Inspection Report 85-36, a Niagara Mohawk investigation identified additional instances of undersized bolting hardware on Remote Shutdown Panel 2CES*PNL405.

Niagara Mohawk believes that the undersized bolting hardware is isolated to Electro-Mechanics and can be attributed to a combination of incorrect vendor detail drawings, vendor fabrication error and misinterpretation of fabrication drawing details.

A review of drawings for all QA Category I Electro-Mechanics panels and limit switches with slotted holes defined was conducted to determine if similar conditions could exist. This review identified an additional 12 pieces of equipment that have the potential for use of undersized bolting hardware.

Corrective Actions:

The four (4) undersized bolts in panel 2CES*PNL405 were replaced with 1/2" bolts, per Nonconformance and Disposition Report 14428. Additionally, the remaining bolting hardware for panel 2CES*PNL405 was inspected on Inspection Report E6A4C⁴67 and found to be satisfactory.

The remaining 12 pieces of equipment will be examined for similar conditions.

Schedule:

Full compliance will be achieved by March 1, 1986.