

February 21, 1986  
(NMP2L 0624)

Mr. R. W. Starostecki, Director  
U.S. Nuclear Regulatory Commission  
Region I  
Division of Reactor Projects  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Starostecki:

Subject: Nine Mile Point Unit 2  
Docket No. 50-410  
Status of Response to Notice of Violation

In Niagara Mohawk's May 4, 1984 response to examples C.2, C.3 and G.2 of Inspection Report No. 83-18, Niagara Mohawk committed to incorporate Advance Change Notices (ACN's) into affected documents within 60 days after issuance. Procedure changes were initially made as committed. However, in order to improve efficiency and control, several revisions have been subsequently made to the procedures governing ACN's as follows:

1. The "60 days from the date of issuance" rule was revised to "60 days from the end of the month in which the ACN was initiated".

Reason: A computerized list of open ACN's is issued to each discipline on the first day of each month. This change was made to allow engineers adequate time to incorporate or approve the ACN's.

2. Approval of ACN's can be documented using an "ACN Approval Cover Sheet".

Reason: The ACN Approval Cover Sheet documents all necessary approvals and brings the ACN to the same level of approval as an Engineering and Design Coordination Report (E&DCR). ACN's which have been approved with an ACN Approval Cover Sheet are incorporated into affected documents using the same incorporation criteria that apply to E&DCR's.

3. ACN's that fall under the ASME N-5 Stress Reconciliation Program are approved in accordance with the N-5 schedule rather than the 60 days rule.

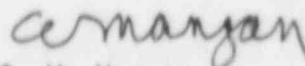
Reason: ACN's are reviewed and approved during Stress Reconciliation in order to complete the ASME N-5 certification. In many cases, depending on the N-5 schedule, this approval may occur much earlier than required by the 60 days rule. However, for those cases where the N-5 review occurs after the 60 days, an unnecessary duplicate effort would be required.

These changes in procedures have been made in accordance with our program requirements to improve the effectiveness and efficiency of our program and to enhance the controls on ACN's.

Presently, the project is in the final stages of construction. At this point in the construction, other changes in the review and approval of ACN's are being made in order to support the construction schedule for completion and turnover of systems for testing. Stone and Webster has implemented an ACN Approval Completion Plan Schedule that prioritizes the ACN review and approval to support the following:

- o ACN's associated with ASME N-5 Stress Reconciliation Program have the highest priority and will be reviewed and approved in accordance with the N-5 Program schedule as described in item 3 above.
- o ACN's associated with the other Category I systems have the second priority and will be reviewed and approved at least 30 days prior to Fuel Load but not necessarily in accordance with the "60 day" rule.
- o ACN's associated with Category II/I systems will be reviewed and approved prior to Fuel Load but not necessarily in accordance with the "60 day" rule.

Very truly yours,



C. V. Mangan  
Senior Vice President

CVM/TL/cia  
(1418H)

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

R. A. Gramm, NRC Senior Resident Inspector  
NMPC Project File (2)