

APPENDIX A
NOTICE OF VIOLATION

Niagara Mohawk Power Corporation
Nine Mile Point Unit 1

Docket No. 50-220
License No. DPR-63

As a result of the NRC inspection conducted during the period April 4 - 8, 1988, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the particular violation is set forth below:

10 CFR 50, Appendix B, Criteria XI requires that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures. Further, it requires that test results be documented and evaluated to assure that test requirements have been satisfied.

The Nine Mile Point Site QA Topical Manual, invokes 10 CFR 50, Appendix B. Site procedures CBI-SI No. 1 Rev. 0 and NES-80A2433 Rev. 3 were established to perform nondestructive testing thickness measurements of class 1, 2, 3 and other piping.

Contrary to Criterion XI:

- (1) Site procedures CBI-SC No. 1 Rev. 0 and NES-8042433 Revision.3 do not establish adequate controls over the nondestructive testing process for making precision thickness measurements in that a grid location marking system is not utilized in order to establish repeatability and meaningful data for evaluation of thickness measurements.
- (2) Torus shell thickness measurements were taken, in some cases, to two decimal place accuracy when three decimal places were required for meaningful evaluation. Also, measurements were not taken in the same locations which rendered the data meaningless for comparison.

This is a Severity Level V violation. (Supplement I)

Pursuant to the provisions of 10 CFR 2.201, Niagara Mohawk Power Corporation is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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