U.S. NUCLEAR REGULATORY COMMISSION REGION I

Report No. 50-410/86-47

Docket No. 50-410

License No. CPPR-112

Licensee: Niagara Mohawk Power Corporation

300 Erie Boulevard, West

Syracuse, New York 13202

Facility Name: Nine Mile Point Unit 2

Inspection At: Scriba, NY

Inspection Conducted: August 4-8, 1986

Inspectors: Thrandhary, Lead Reactor Engineer

Aug 19, 1986 date

Approved by: C. Setrone for J. Johnson, Chief, Operational Programs Section, OB, DRS

Auc 19 1986 date

Inspection Summary: Inspection on August 4-8, 1986 (Inspection Report Number 50-410/86-47)

Areas Inspected: A routine unannounced inspection by one region-based inspector of the Technical Specification surveillance testing and calibration program; calibration of safety-related instruments; and the measuring and test equipment control program.

Results: No violations or deviations were identified.

8609030320 860822 PDR ADDCK 05000410 PDR Q

DETAILS

Sei de

1.0 Persons Contacted

Niagara Mohawk Power Corporation

C. G. Beckham, QA Engineering Supervisor

* R. B. Abbott, Station Superintendent

* M. J. Ray, NMP-2 Manager of Special Projects

* P. K. Wildee, QA Surveillance Supervisor

* G. D. Sanford, Assistant Station Shift Supervisor

* K. F. Roenick, Site Representative, NYPSC

* D. Myers, Supervisor, Planning and Scheduling

* B. R. Morrisson, Project Quality Engineering

* S. K. Agrawal, NMP-2 Special Projects

Stone and Webster Engineering Corporation

* S. Cook, Test Engineer

* C. L. Terry, Project QA Manager

* M. Sheldon, Project Administrative Manager

U.S. Nuclear Regulatory Commission

* W. A. Cook, Senior Resident Inspector

In addition to the above, the inspector contacted, and held discussions with other licensee personnel (including engineers, supervisors, and QA/QC personnel) during the course of this inspection.

* indicates those present at the exit meeting held on August 8, 1986.

2.0 Surveillance Testing and Calibration Control Program

The inspector reviewed documentation to ascertain whether the licensee had developed and effectively implemented programs for surveillance testing, calibration, and inspections required by section 4 of the plant Technical Specification (TS). The program for calibration of other safety-related instrumentation, not covered by TS, was also examined for adequacy and effectiveness. The inspector interviewed and held discussions with licensee personnel and cognizant plant management to assess their knowledge and understanding of the program requirements, and to review responsibilities assigned to various departments and sections of the licensee's organization.

2.1 Program Review

The inspector reviewed the licensee's management controls for Surveillance Test and Calibration (ST) program. The ST program is managed and controlled by a computer matrix system. The computer program has been specifically developed by a contractor for this site to store and track instrument calibration and surveillance test information. This information includes the last date of calibration or test, the date of the next scheduled surveillance, whether the scheduled frequency has been met, and the latest date by which the surveillance must be performed. It also indicates the responsible departments for such tests.

The inspector determined that access to the program is controlled by the project planning department. The project planner is responsible for entering data into the system. Each responsible department provides current ST information to the project planner on a weekly basis. Procedures are under development within the planning department to ensure the accuracy of data entered into the computer. The inspector reviewed a draft procedure (N2-PI-2.1) covering such activities. The procedure appeared adequate. Formal audits and spot checks are also performed by site QA department personnel to assure correctness and validity of this master schedule developed by the computer program.

2.2 Findings

Based on the above review, examination, and discussions with cognizant personnel, the inspector determined that:

- A master schedule for TS calibration and functional testing of instrumentation and systems was established; the schedule included frequency of each test/calibration and/or inspection, the responsibility for implementation, and the surveillance test/ calibration status of the item or system.
- The responsibility for maintaining and up-dating the schedule was established and assigned by procedure.
- 3. The current master schedule reflected the TS requirements for such tests and/or calibration, and
- The responsibilities for review and evaluation of data, reporting and controlling deficiencies, and ensuring the required surveillance test/calibration was satisfied had been established by procedures.

The inspector had no further questions in this area. No violations were identified.

3. <u>Calibration of Safety-Related Components Not Covered by Technical</u> <u>Specification</u>

The inspector reviewed the program description and examined records to determine if calibration requirements had been established for components associated with safety-related systems and/or functions, but that were not specified in the TS and if a master schedule had been developed that included calibration frequency, responsibility for implementation, and the calibration status of each component.

The inspector determined that a calibration program had been established for such safety-related components. A master schedule had been developed to show the responsibility, frequency, and the status of calibration for each safety-related component not covered by the Technical Specification, as well as to ensure adequate records were maintained.

No violations were identified.

4. Surveillance Procedure and Records

The inspector reviewed procedures and records to verify that surveillance of safety-related systems and components was being conducted in accordance with approved procedures as required by TS; and also if these procedures were adequate to accomplish the safety intent of the TS requirement, thus assuring operational safety of the plant.

The inspector randomly selected ten tests from completed surveillance tests to verify the adequacy of conformance to the above requirements. Documents reviewed are listed in section 9 of this report.

4.1 Findings

Based on the above review and examinations, the inspector determined that the procedures were adequate to direct and control surveillance testing. Procedures included required prerequisites and preparations for test; acceptance criteria; instructions and steps to assure that the system or components were restored to an operating condition after the test; and responsibilities for review and approval for the test data. Procedures appeared to meet the intent of the TS surveillance testing requirements.

The inspector also determined that the records maintained for these tests were adequate. They showed that the completed tests were reviewed for acceptability of results; met the testing frequency; and were in conformance with the TS requirements for the surveillance tests.

No violations were identified.

5. Quality Assurance Program for Measuring and Test Equipment

The inspector reviewed the licensee's QA program to ascertain if the program adequately provided administrative controls over measuring and test equipment (M&TE); and if the controls provided were in conformance with regulatory requirements, commitments, and industry standards.

The program review consisted of verification of licensee's commitments in the Final Safety Analysis Report (FSAR) for conformance with regulatory requirements, and review of procedures for adequacy. The inspector determined that the licensee's commitments in the FSAR were generally adequate to fulfill regulatory requirements. The procedures contained criteria and responsibilities for calibration frequency, methods for placing in cr removing equipment from service, and the calibration status of the equipment.

The procedures also included methods of documenting calibration history of equipment, including:

- Traceability to calibration source.
- As-found and as-calibrated data,
- Identification of standards used.
- Identification of calibration procedure used, and its traceability to a national standard.
- Date of calibration, and
- Name of person performing calibration.

The procedure also specified that M&TE equipment must have accuracy four times greater than the equipment which was being calibrated. A system, very similar to the master schedule used for TS calibration, was in use for controlling the calibration frequency and recall of equipment. Requirements for the history of use, and controls to prevent inadvertent use of equipment beyond calibration frequency were also established. The procedure also required an investigation and evaluation of data recorded by the M&TE prior to scheduled calibration if the M&T Equipment was found to be out of calibration. The inspector also questioned the responsible I&C supervisor to assess his knowledge and understanding of the program, and found him to be knowledgeable.

No violations were identified.

6. Quality Assurance (QA) Department Involvement in Surveillance/Calibration Program

The inspector examined documents, and held discussions with QA supervisors and cognizant personnel to assess the understanding of their responsibilities in this area, and their involvement in the implementation of this program.

Based on the above discussions and the examination of QA records, the inspector determined that the plant QA department performed planned structured program audits. Additionally, QA personnel perform surveillance inspections routinely. The surveillance inspections are not comprehensive, structured inspections, but are limited scope inspections covering individual items, activities or a small part of the program. These surveillance inspections are designed to verify the overall implementation of calibration and TS surveillance test program.

Based on the above examination and discussions, the inspector determined that Quality Assurance management and staff were aware of their responsibilities; the planned audits were comprehensive, and were well documented.

No violations were identified.

7. Actions on Previously Identified Items

(Closed) Violation 86-09-46: This violation involved the attachment of Class 1E rigid electrical conduits in non-seismic structure. The licensee has provided additional seismic bracing to resist seismic forces, thus protecting the integrity of the conduits in question. The additional structural bracing is an acceptable solution to the problem. This item is closed.

8. Management Meeting

At the conclusion of the inspection, the inspector met with licensee management (identified in paragraph 1 with an *), at which time the inspectors summarized the purpose, scope, and the findings of the inspection. The licensee acknowledged the inspectors' findings.

At no time during this inspection, did the inspector provide written material to the licensee.

9. Documents Reviewed/Audited

- Final Safety Analysis Report, Chapter 17
- NMP-2 Draft Technical Specification, Section 4
- -
- Procedure AP-1.0, Rev. 1, "Procedure for Admin. Control" Procedure AP-1.1, Rev. 2, "Composition and Responsibility of Site Organization"
- Procedure AP-1.2, Rev. 2, "Comp. and Respons. of Unit Organ."
- Procedure AP-2.0, Rev. 5, Production and Control of Procedures"
- Procedure AP-3.0, Rev. 0, "Assurance of Safety
- Procedure AP-3.4.1, Rev.O, "Administration of Technical and Safety Reviews"
- Procedure AP-8.0, Rev. 1, "Assurance of Equipment Integrity"

- Procedure AP-8.1, Rev. 2, "Preventive Maintenance"
- Procedure AP-8.2, Rev. 2, "Surveillance Testing and Inspection Program"
- Procedure AP-8.4, Rev.
 of Equipment Used in Tests and Inspection"
- Procedure QA 10.02, Rev. 0, "Preparation of QA Checklists"
- Procedure QAP 10.03, Rev. 1, "QA Department Surveillance Activity"

Documents Reviewed

QA Review Sheets

Surveillance #

N2-OSP-ADS-ROO1 N2-OSP-CCP-CS001 N2-OSP-CCP-0001 N2-0SP-CMS-0001 N2-OSP-CMS-ROO1 N2-OSP-CNT-M001 N2-USP-CNT-M003 N2-OSP-CNT-R003 N2-OSP-CSH-CS001 N2-OSP-CSH-M001 N2-OSP-CSH-Q001 N2-OSP-CSH-0002 N2-OSP-CSH-ROO1 N2-OSP-CSH-R002 N2-OSP-CSL-0001 N2-OSP-EFG-M001

N2-ISP-CSH-M002 N2-ISP-CSH-R101 N2-ISP-CSL-R101 N2-ISP-LDS-R103 N2-ISP-NMS-Q109 N2-ISP-NMS-W009 N2-ISP-OFG-R101 N2-ISP-OFG-SA001 N2-ISP-RDS-M001 N2-ISP-RDS-Q102 N2-ISP-RHS-R122 N2-ISP-SWP-R105 N2-ISP-TIP-R001 N2-ISP-ISC-M005