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50-410

REC: CARLSON R T
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NIAGARA MOHAWK PWR

DOCDATE: 02/21/78
DATE RCVD: 02/27/78

DOCTYPE: LETTER NOTARIZED: NO

COPIES RECEIVED

SUBJECT:

LTR 1 ENCL 1

FORWARDING FINAL CONSLUCIONS DESCRIBING POSSIBLE BREAKDOWN IN THE
GRAVER TANK & MANUFACTURING CO"S. SHOP QUALITY ASSURANCE
PROGRAM... WITH CORRECTIVE ACTIONS.

PLANT NAME: NINE MILE POINT - UNIT 2

REVIEWER INITIAL: XJM
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***** DISTRIBUTION OF THIS MATERIAL IS AS FOLLOWS *****

CONSTRUCTION DEFICIENCY REPORT (10CFR50.55(E).
(DISTRIBUTION CODE B004)

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DISTRIBUTION: LTR 40 ENCL 28
SIZE: 1P+2P

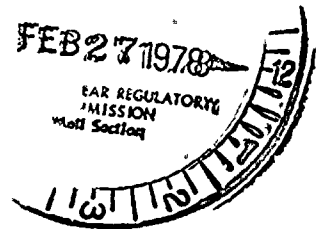
CONTROL NBR: 780580057

***** THE END *****

February 21, 1978

Office of Inspection and Enforcement
Region I
Attention: Mr. R. T. Carlson, Chief
Reactor Construction and Engineering
Support Branch
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Re: Nine Mile Point Unit 2
Docket No. 50-410



Dear Mr. Carlson:

On January 20, 1978, your staff was advised of a possible breakdown in the Graver Tank & Manufacturing Company's shop Quality Assurance Program. This condition involved shop fabrication of electrical penetrations for Nine Mile Point Unit 2.

Based on the further investigation and evaluation of this matter, Stone and Webster and Niagara Mohawk Power Corporation determined that the deficiency did not warrant being reported.

The final report which describes these conclusions in accordance with Section 50.55(e) of the Commission's regulations is attached.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

Gerald K. Rhode, Vice President
System Project Management

PEF/szd

Attachment

780580057

Xc: ✓ Mr. Ernst Volgenau
Inspection & Enforcement Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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I. DESCRIPTION OF DEFICIENCY

During a shop inspection of Graver Tank and Manufacturing Company's East Chicago, Indiana facility, the final documentation package for ten electrical penetrations was presented to the Stone & Webster Procurement Quality Control Inspector for review. This documentation indicated that all required fabrication work, inspections, and tests had been performed on the penetrations, and they were ready to be released for shipment. Upon proceeding to the work area for a visual inspection of the penetrations, the inspector discovered that shop personnel were still welding on two of the penetrations. This in conjunction with the fact that 23 unsatisfactory findings in inspections by our architect engineer, Stone & Webster, of Graver Tank during a long period of time, led to reporting this condition under 50.55(e) as a significant breakdown in Graver Tank and Manufacturing Company's Quality Assurance Program.

II. ANALYSIS OF SAFETY IMPLICATIONS

Investigation of this deficiency revealed that the work being done on the two penetrations was repair work as the result of an extra Halogen Test. This test was performed because Graver determined that the particular welds which are normally tested in the field would be inaccessible at that time if repairs were necessary. Therefore, the welds for all ten penetrations were Halogen tested and two were found to require repair. A traveler was initiated for the repair work which shows that it was performed under the control of the shop Quality Assurance Program. However, Graver failed to remove the two penetrations from the list of items being presented to the inspector for final inspection.

A review of the remaining 22 unsatisfactory findings reveals that they were the result of routine shop inspections over a long period of time. Since a shop inspection program is expected to discover and correct unsatisfactory findings, these findings are not indicative of a significant breakdown in Graver's Quality Assurance Program. These items have been satisfactorily resolved, and the last eleven shop inspections at Graver have resulted in no unsatisfactory findings.

Since these items had passed normal shop requirements, and had a traveler for the additional repair work, this condition did not have any adverse safety effects.

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III. CORRECTIVE ACTION

On January 21, 1978, a meeting was held at Graver Tank & Manufacturing Company's East Chicago, Indiana, facility to review and discuss the problems which lead to reporting a potential 10CFR50.55(e) deficiency. In attendance were Graver management personnel, Stone & Webster Procurement Quality Control management, and a Niagara Mohawk Power Corporation Quality Assurance representative. As a result of this meeting, the following corrective action has been taken:

- 1) Graver has instituted the practice of 100% final inspection prior to submittal to Stone & Webster Procurement Quality Control for shipment.
- 2) Graver has set aside an area in the shop as the final inspection area. If feasible, material will not be presented for final inspection until it is moved to this area.
- 3) An additional person will be employed by Graver, whose function will be to review all documentation for correctness and completeness prior to submittal to Stone & Webster Procurement Quality Control.
- 4) Graver will institute a Quality Assurance function of continuously monitoring shop work and procedure adherence.
- 5) Stone & Webster and Graver will institute an interface procedure for handling and controlling the Shop Inspection Discrepancy Reports.

In addition to the above, Stone & Webster will increase coverage of Graver shop work by a resident Procurement Quality Control Shop Inspector. Stone & Webster and Niagara Mohawk Power Corporation will be advised periodically on the progress and effectiveness of Graver Quality Assurance shop activities.

RECEIVED DOCUMENT
CONTROL DESK

1978 FEB 24 PM 2 29

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