

May 12, 1982

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Re: Docket No. 50-220
Inspection Report No. 82-03

Dear Mr. Martin

This refers to the routine safety inspection conducted by Mr. G. Meyer of your office on March 1-5, 1982, of activities authorized by NRC License No. DPR-63 and to the discussions of your findings held by Mr. Meyer with Mr. T. Roman of our staff at the conclusion of the inspection.

ITEM A 10 CFR 50, Appendix B, Criterion XVI, states, "Measures shall be established to assure that conditions adverse to quality, such as ... nonconformances, are promptly identified and corrected."

The Quality Assurance program, as implemented in FSAR, Thirteenth Supplement, paragraph 16.2, states, "Conditions adverse to quality, such as deviations, nonconformances, ..., etc., are to be identified and appropriate corrective action is to be taken in accordance with established procedures."

Contrary to the above, the required corrective action programs did not ensure effective corrective action to licensee identified problems in the implementation of maintenance, as evidenced by the following examples:

- Step 5.6.10 of APN-13, "Procedure for Control of Station Corrective Repair and Maintenance", Rev. 1, March 10, 1980, specifies that Work Request (WR) forms shall have Quality Control (QC) verification signatures. Licensee Audit Report 80-19 dated December 1980 identified three examples of WR's with no QC verification signatures. On March 5, 1982, this condition adverse to quality was uncorrected in that WR 5331 dated March 14, 1981, did not have the required verification signature.

- Procedure APN-13 step 5.6.8 specifies that WR's are to indicate whether or not an operability test is required. Licensee Audit Report 80-19 dated December 1980 identified thirteen examples of WR's which had no indication of whether or not an operability test was required. On March 4, 1982, this condition adverse to quality was uncorrected in that nine examples of similar nonconformances in a sample of sixteen WR's completed in 1981, and sixteen similar nonconformances in a sample of 20 WR's completed in 1982, were identified.
- Step 5.6.11 of APN-13 specifies that the Station Shift Supervisor (SSS) must sign on the WR that the repaired equipment is accepted for service prior to placing the equipment back in operation. Licensee Audit Report 80-19 dated December, 1980, identified seven examples of WR's on which the repaired equipment was put back into service prior to or without the verification signature of the SSS. On March 4, 1982, this condition adverse to quality was uncorrected in that on WR 17109 dated November 20, 1981, the safety-related equipment was placed back into service on November 21, 1981, without the required SSS signoff on the WR. The signoff was not done until December 9, 1981.

RESPONSE

The Niagara Mohawk Power Corporation's Quality Assurance Program, as implemented in accordance with the FSAR, Thirteenth Supplement, Section XVI, is in full compliance with 10 CFR 50, Appendix B, Criterion XVI. The Thirteenth Supplement to Final Safety Analysis Report section 16.3 states:

"Malfunctions, deficiencies, or nonconformances are reported in accordance with procedures. The mechanics for implementing the deficiency and corrective action system are the responsibility of the Quality Assurance Department. This implementation is accomplished by means of established procedures which require:

- (a) That the reported condition is identified and evaluated with regard to the need for corrective action.
- (b) That the cause of the condition is determined and that prompt corrective action is implemented.
- (c) That determination of corrective action is made by cognizant and responsible personnel.

- (d) That follow-up action is taken to provide implementation, verification, and closure of the documentation by the appropriate Quality Assurance Department Supervisory personnel.

In compliance with the FSAR the Quality Assurance Department follows QA Procedure 16.40. The scope of QA Procedure 16.40 is:

"This procedure delineates the corrective action systems used by the Quality Assurance Department for reporting and following up on quality-related problems."

In accordance with QA Procedure 16.40, the Niagara Mohawk Power Corporation's response to the Work Request nonconformance was obtained. When the response date was passed, QA Department initiated section 5.4.3 (Unacceptable or Delinquent Responses). This resulted in an escalation, which was to inform the Vice President of Nuclear Generation.

The result of the escalation was that Niagara Mohawk Power Corporation was able to establish the completion date of June 1, 1982, for corrective action. The corrective action will be to revise APN-13 including the establishment of an independent inspection group. Upon issuance of the revised procedure, Niagara Mohawk Power Corporation will train affected station personnel in the revised procedure.

Very truly yours

Niagara Mohawk Power Corporation



D. P. Dise
Vice President Engineering

SG/jm