



NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

November 30, 1982

Mr. R.W. Starostecki, Director
U.S. Nuclear Regulatory Commission
Region I
Division of Project and Resident Programs
631 Park Avenue
King of Prussia, PA 19406

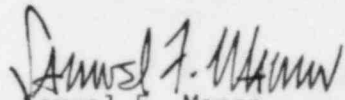
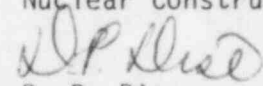
RE: Nine Mile Point Unit 2
Docket No. 50-410

Dear Mr. Starostecki:

Your Inspection Report No. 50-410/82-11 dated October 18, 1982, identified two apparent violations resulting from an inspection conducted at the Nine Mile Point Unit 2 Construction Site. Niagara Mohawk's response is enclosed.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION


Samuel F. Manno
Vice President
Nuclear Construction

D. P. Dise
Vice President
Quality Assurance

xc: Mr. R. D. Schulz, Resident Inspector

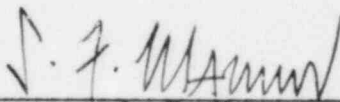
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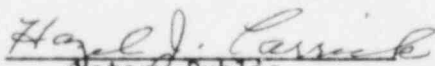
S. F. MANNO, being duly sworn says:

I am Vice President - Nuclear Construction of Niagara Mohawk Power Corporation. I have read the foregoing letter and attachment, and the information contained in the letter and attachment is true to the best of my knowledge, information and belief.


S. F. Manno

Sworn to before me on

this 30th day of November, 1982


Notary Public

HAZEL J. CARRICK

Notary Public in the State of New York

Qualified in Onon. Co. No. 4524460

My Commission Expires March 30, 1984

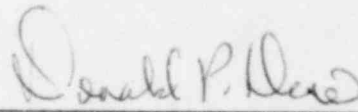
STATE OF NEW YORK

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COUNTY OF ~~OTSEGO~~
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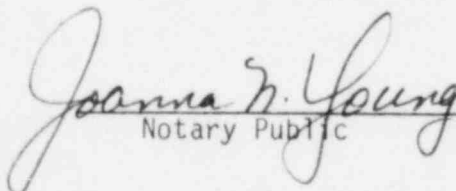
D. P. DISE, being duly sworn says:

I am Vice President - Quality Assurance of Niagara Mohawk Power Corporation. I have read the foregoing letter and attachment, and the information contained in the letter and attachment is true to the best of my knowledge, information and belief.


D. P. Dise

Sworn to before me on

this 30th day of November, 1982


Notary Public 3-30-83
#4508924

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT UNIT 2
DOCKET NO. 50-410

Response to Notice of Violations
Attached to NRC Inspection Report
No. 50-410/82-11

The first apparent violation was identified as follows:

- a. 10CFR50, Appendix B, Criterion V states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures...."

ITT Grinnell Industrial Piping, Inc., Quality Assurance Manual, Section 4, Process Control, states in part that the field engineer shall describe the work to be performed in the field planner, and, if a change or revision is required, the change or revision will be described in the original planner.

Contrary to the above, ITT Grinnell field personnel cut 5/8 of an inch off spent fuel pool spool piece NM-7-270X, including a beveled end, without authorization documented in the field planner or instructions for the cut and re-bevel.

This is a Severity Level V Violation (Supplement II).

The following is submitted in response to this item of nonconformance:

ITT Grinnell generated Corrective Action Report (CAR) No. 513, which placed the subject spool piece on hold and provided a description of what had occurred. CAR 513 also delineated the required actions necessary to correct the conditions and prevent recurrence.

Subsequently, ITT Grinnell initiated Deviation Report (DR) No. 3001, which has been dispositioned giving specific direction required to correct the subject deviations.

A letter dated September 1, 1982, was sent to all ITT Grinnell engineering personnel defining the 1 inch erection tolerances. In addition, ITT Grinnell has conducted several training sessions to prevent recurrence of this item.

The second apparent violation was identified as follows:

- b. 10CFR50, Appendix B, Criterion II states in part, "The quality assurance program shall provide control over activities affecting the quality of the identified structures, systems and components to an extent consistent with their importance to safety. Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, such as adequate cleanness; and assurance that all prerequisites for the given activity have been satisfied".

10CFR50, Appendix B, Criterion XVI states in part that measures shall be established to assure that conditions adverse to quality such as deviations and nonconformances are promptly identified and corrected.

The Nine Mile Point Nuclear Station Unit 2 PSAR, Appendix D adopts Stone and Webster Engineering Corporation (SWEC) Specifications. SWEC Specification NMP2-7201, Field Storage, Handling and Issuance of Welding and Brazing Materials, Revision 1, states in part, "Storage ovens which contain mild steel or low alloy steel covered electrodes shall be maintained at $300^{\circ}\text{F} \pm 50^{\circ}\text{F}$. All other covered electrodes shall be stored at $200^{\circ}\text{F} \pm 50^{\circ}\text{F}$."

Contrary to the above:

1. The inspector discovered through a record review that on May 18, 1982, the temperature of rod oven 4 was 148°F , which violated the specification temperature parameters of NMP2-7201 for E308-16, 1/8 inch electrodes.
2. The discrepancy was neither identified as being nonconforming nor was corrective action taken.
3. Quality control had no documented evidence that the E308-16 electrodes stored in oven 4 and used on the spent fuel storage pool liner were maintained in the oven at acceptable temperatures from April 7, 1982 to June 17, 1982.
4. Calibrated thermometers are not required to be attached to the rod ovens to assure temperature maintenance.
5. The rod ovens do not require periodic calibration to assure accurate thermostat control.
6. The quality assurance program requires only monitoring the ovens once during the month, which does not assure temperature maintenance.

This is a Severity Level IV Violation (Supplement II).

The following is submitted in response to this item of nonconformance:

SWEC Field Quality Control (FQC) had performed an inspection on rod oven 4 on May 18, 1982 and discovered that the oven temperature was 148°F, which violated the requirements of Specification No. NMP2-7201. As immediate corrective action, the contractor indicated the oven temperature was adjusted to comply with specification requirements; however, this action was not documented.

The failure to identify the weld rod stored in oven 4 and the violation of Specification NMP2-7201 on a Nonconformance and Disposition Report (N&D) was the result of an error by the FQC inspector.

Corrective actions performed are as follows:

1. A review of suspected electrodes issued from the station which includes oven 4 from April 7, 1982 to June 17, 1982 determined that the electrodes were used on the spent fuel pool liner. This time period bracketed the interval when oven 4 was suspected to be out of tolerance.
2. Nonconformance and Disposition Report No. 3731 was issued to document that oven 4 violated the requirements of NMP2-7201.
3. The spent fuel pool liner welds were non-destructively examined and found satisfactory and therefore determined not to have been affected by the out of tolerance storage of the weld rods.
4. As the result of this investigation, a change in the administration of the weld rod control system was made to increase the project's ability to identify and track the weld rod materials.

Actions taken which are intended to preclude reoccurrence of this problem are as follows:

1. The SWEC FQC Inspector who performed this inspection, as well as the other SWEC FQC personnel responsible for performing inspections of weld material control, have received retraining on the requirements relating to weld material control and the proper means of documenting this type of inspection in accordance with the SWEC Quality Assurance Program.
2. Even though the SWEC Quality Assurance Program and Specification No. NMP2-7201 does not require that the weld storage oven have either a calibrated thermometer or a calibrated thermostat to assure temperature maintenance, the project has installed a calibrated thermometer in each weld storage oven. Consistent with the SWEC QA Program, SWEC FQC will continue to monitor and document these oven temperatures in the oven control log, at a minimum, once a month.