

NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

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SYRACUSE, N.Y. 13202

GERALD K. RHODE
SENIOR VICE PRESIDENT

January 25, 1983

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

Subject: Docket No. 50-410
Systematic Assessment of
Licensee Performance
Nine Mile Point Unit 2

This letter provides our comments on your November 24, 1982 assessment of Nine Mile Point Unit 2 construction activities. In general, we consider this assessment to be objective and the recommendations to be constructive. The following comments for each functional area of your assessment are being forwarded to provide a more complete view of the subject:

1. Soils and Foundation
No comment.
2. Containment and Other Safety-Related Structures
No comment.
3. Piping Systems and Supports
No comment.
4. Safety-Related Components

Niagara Mohawk Power Corporation's Quality Assurance Department has increased surveillance of Reactor Controls, Inc. activities. The Quality Review Group will be assessing root-cause analysis to reduce and eliminate, if possible, the risk of re-inspection and re-work activities.

83-02

With regard to Preventative Maintenance, as noted in the Systematic Assessment of Licensees Performance Report, the Preventative Maintenance Contract has recently been reassigned to Stone & Webster Engineering Corporation. Stone & Webster Engineering Corporation has assigned an experienced Preventative Maintenance Manager to oversee a qualified and trained staff responsible for implementing the Preventative Maintenance portions of the storage and maintenance specification. Applicable site procedures have been strengthened to clearly define the responsibilities of the Preventative Maintenance Manager, the Materials Manager and the site contractors for proper implementation of this specification.

Both the Preventative Maintenance group and Stone & Webster Engineering Corporation Field Quality Control have conducted baseline inspections of stored equipment. Deficiencies identified are being resolved through rework or Engineering disposition.

Niagara Mohawk has also increased its oversight efforts in Preventative Maintenance through joint Quality Assurance/Construction review of the specification and daily monitoring of Stone & Webster Engineering Corporation's Preventative Maintenance activities.

5. Support Systems

Storage and housekeeping have received increasing attention at Nine Mile Point Unit 2. With the Preventative Maintenance program being conducted by Stone & Webster Engineering Corporation, an area inspection concept by Construction personnel has been implemented. Unsatisfactory conditions are reported to the responsible Stone & Webster Engineering Corporation discipline supervisors for corrective action.

Stone & Webster Engineering Corporation is in the process of revising site procedures to enhance responsiveness to these types of identified unsatisfactory conditions.

6. Electrical Power Supply

No comment.

7. Quality Assurance

The Niagara Mohawk Power Corporation Quality Assurance organization has been strengthened and reorganized. The Quality Assurance organization is now under a Vice President - Quality Assurance, and there are currently 39 personnel on site, 19 off site, and additional site personnel are expected to be added in 1983.

8. Licensing

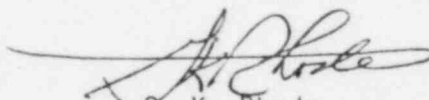
The following current licensing activities are considered sufficiently significant to be added to this section:

- a. Niagara Mohawk Power Corporation submittal of revetment ditch design
- b. Niagara Mohawk Power Corporation submittal of EPG ball valve topical report

9. Instrumentation and Control

No comment.

Very truly yours,



G. K. Rhode
Senior Vice President

GKR/TL:ja
cc: NRC Resident Inspector
M. Houghey, NRC Bethesda