

SAMUEL F. MANNO
VICE PRESIDENT
NUCLEAR CONSTRUCTION

April 26, 1983

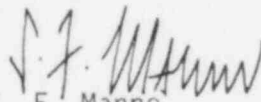
Mr. R. W. Starostecki, Director
U.S. Nuclear Regulatory Commission
Region I
Division of Project and Resident Programs
631 Park Avenue
King of Prussia, PA 19406

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

Dear Mr. Starostecki:

Your Inspection Report No. 50-410/83-02 dated March 28, 1983, identified an apparent violation resulting from an inspection conducted at the Nine Mile Point Unit 2 construction site. Niagara Mohawk's response is enclosed.

Very truly yours,



S. F. Manno
Vice President
Nuclear Construction

SFM/TL:ja
xc: R. D. Schulz, Resident Inspector

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

Response to Notice of Violation
Attached to NRC Inspection
Report No. 50-410/83-02

The apparent violation was identified as follows:

- A. 10CFR50, Appendix B, Criterion V, states in part that activities affecting quality shall be prescribed by documented instructions and procedures.

10CFR50, Appendix B, Criterion VI, states in part that documents are distributed to and used at the location where the prescribed activity is performed.

ITT Grinnell Industrial Piping, Inc., Quality Assurance Manual, Section 4, Process Control, states in part that field engineering shall describe the work to be performed in the process planner and construction shall be responsible for performing work in accordance with the planner.

Contrary to the above:

1. On March 7, 1983, a site-fabricated pipe spreader was being used on the inside of a 12-in. nominal residual heat removal pipe, identified on Isometric No. 66-49 as spool piece No. NM-66-331X, and heat was being applied in order to correct ovality deviations; however, instructions for the work were not provided in the process planner nor were procedures documented that prescribed the activities.
2. On March 8, 1983, grinding was being performed for inservice inspection surface condition on a 12-in. nominal high-pressure core spray pipe identified on Isometric No. 25-10 at field weld No. 001, using an incorrect process planner for performing the grinding activity.

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

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

1. The first part of the violation pertains to a weld fit up of a pipe joint (ISO 66-49 FW002). The fit up was being accomplished by the use of an internal pipe spreader (i.e., screw spider) rather than by grinding as specified in Engineering Directive No. F10.1B.IP-1828. ITT Grinnell Construction was provided with documented procedures (via engineering directive) in the process planner for the fit up and grinding of the weld. The cause of the violation is that ITT Grinnell craftsmen opted to utilize a spreader in lieu of grinding to correct ovality. This was done without change to the engineering directive, since use of a spreader was believed by the craftsmen to be an acceptable, commonly used option.

After this condition was identified by the Nuclear Regulatory Commission Resident Inspector, ITT Grinnell issued a stop work directive for all construction activity associated with ISO 66-49 FW002.

ITT Grinnell will take the following actions to prevent recurrence of this condition:

ITT Grinnell will issue written instructions to all supervisory construction personnel to the effect that where the specific engineering directives or procedures for the control of a process have been incorporated into the planner package, which directs work, compliance to the directives or procedures is mandatory; alternate methods/construction procedures shall not be employed without written approval from ITT Grinnell field engineering. Any deviations may result in disciplinary action. This will be completed by June 15, 1983. These instructions will be included in training for new supervisory personnel.

2. The cause of the second part of the violation is that an ITT Grinnell construction supervisor issued an incorrect process planner to the craftsmen.

The work in question was stopped by ITT Grinnell at the request of the Nuclear Regulatory Commission Resident Inspector. The correct process planner was obtained before restarting the work.

In order to prevent recurrence of the condition, the affected superintendent and foremen in charge of inservice inspection grinding craftsmen will receive additional training with regard to the importance of ensuring that the correct planner is at the work site. This training will be completed by May 1, 1983.