

NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK300 ERIE BOULEVARD, WEST
SYRACUSE, N. Y. 13202

April 21, 1983

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

RE: Docket No. 50-220
Inspection Report #83-02

Dear Mr. Martin

This refers to the routine, safety inspection conducted by Mr. S. Hudson of your office on February 1 to 28, 1983, at Nine Mile Point Unit #1, Scriba, New York, of activities authorized by NRC License No. DPR-63 and to the discussions of your findings held by Mr. S. Hudson with Mr. T. Roman of our staff at the conclusion of the inspection.

ITEM A

10 CFR 50, Appendix B, Criteria V, "Instructions, Procedures and Drawings" and the Quality Assurance Program dated July 30, 1979, Section 5.2 require that instructions or procedures for activities affecting quality shall include appropriate quantitative or qualitative acceptance criteria.

Contrary to the above, on February 25, 1983, the procedure for the installation of flanges on the recirculation piping decontamination connections did not contain appropriate acceptance criteria for gasket material, torquing sequence, or torque value.

RESPONSE

Procedure MP 44.1 was written for the use of trained site Maintenance personnel, and therefore, ANSI 18.7 - 1972 applies. This standard classifies gasket replacement and tightening flanges to stop leaks as those types of jobs that may be done without a step-by-step procedure if the job is within the skills normally possessed by

RESPONSE (continued)

qualified personnel. The NRC accepts this as stated in a letter from J.L. Skolds, Region II, dated August 18, 1978.

In addition, Piping Code B31.1, Sec. 135.2.1 and Sec. 135.2.2 along with ASME III NB4720 do not indicate that specifics such as gasket material, torquing value or torquing sequence must be proceduralized. Both only instruct (quoting ASME III) that, "In bolting flanged joints, the contact faces of the flanges shall bear uniformly on the gasket and the gasket shall be properly compressed in accordance with the design principals applicable to the type of gasket used. All flanged joints shall be made up with relatively uniform bolt stress." "Relatively uniform bolt stress" implies torquing values are not required.

Further, the "quantitative or qualitative acceptance criteria" for a blank flange is leakage. These flanges will be inspected during the primary system hydrostatic test prior to plant startup.

Therefore, "quantitative or qualitative acceptance criteria" does exist. Since the proper gasket material was used, and the applicable codes do not require torquing sequence or torque values to be proceduralized; and since the ANSI Standard and the NRC accept that a skilled craftsman can torque without step by step procedures, Niagara Mohawk was not deficient in this area.

Newport News Ind. Construction Co. installed decon tap flanges on the five recirculation loops per a safety related work request from Niagara Mohawk Power Corp. NNI's contract for the replacement of the recirculation piping, and their quality assurance program does not address the use of NMPC work requests in their system. Consequently, NNI construction is not familiar with or trained in the use of Administrative Procedure No. APN-13, "Procedure For Control of Station Corrective Repair and Maintenance", and there was no notification of NMPC QA per APN-13, Sec. 4.5.1 when work was performed.

NNI QA and construction have been told not to perform non-controlled Work Instruction work and NMPC Engineering will only direct work to NNI through the use of a contract change and safety related work will be done per the NNI QA program.

The decontamination tap flanges have also been reinstalled using NNI's QA program with a complete installation procedure and with NMPC QA hold/witness points.

ITEM B

10 CFR 50, Appendix B, Criteria XVII, "Quality Assurance Records" and the Quality Assurance Program dated July 30, 1979, Section 17.6 require that records of inspections and tests shall include the acceptability of the results.

Contrary to the above, on February 18, 1983, no record of the review for acceptability of the piping spring hanger inspection performed in April 1981 exists.

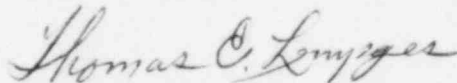
RESPONSE

The following corrective action has been taken to rectify the deficiency in our inspection records:

NMP#1's visual examination procedure includes logging of the required and actual setting values for hangers. It has been incorporated into this procedure that if these values are not the same, and therefore, unacceptable, "this condition shall be reported to the plant owners Engineering Department, and disposition shall be documented on the applicable data sheets."

Due to these actions, Niagara Mohawk Power Corporation is presently in full compliance.

Very truly yours



Thomas E. Lempges
Vice President
Nuclear Generation

TEL/RGR/jm