

NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

300 ERIE BOULEVARD, WEST
SYRACUSE, N. Y. 13202

March 20, 1984

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. 50-290
Inspection Report 83-26
Niagara Mohawk Letter dated February 21, 1984

Dear Mr. Martin:

This refers to the routine Safety Inspection conducted by Mr. P. Clemons of your staff on November 7-10, 1983, at Nine Mile Point Unit #1, Scriba, New York of activities authorized by NRC License No. DPR-63.

Our response dated February 21, 1984 answered item A of Inspection Report 83-26 and requested 30 day extension on items B and C. Our responses to these items are as follows.

ITEM B

10 CFR 71.101(b) requires each license to establish a quality assurance program for packages. 10 CFR 71.101(f) states that a Commission approved quality assurance program that satisfies the applicable criteria of Appendix B of Part 50 of this chapter, and which is established, maintained and executed with regard to transport packages will be accepted as satisfying the requirements of paragraph (b) of this section.

Criteria II, Appendix B of Part 50 of the licensee's previously approved program requires that the licensee identify the structures, systems and components to be covered by the quality assurance program.

Contrary to the above, as of November 9, 1983, the licensee has not identified transport packages as a structure, system or component to be covered by the quality assurance program.

RESPONSE

By a letter dated June 2, 1981 from Niagara Mohawk Nuclear Quality Control Supervisor, Mr. David Palmer, to Niagara Mohawk General Superintendent of Nuclear Generation, Mr. Thomas Perkins, transportation packages were included in the Nine Mile Point Unit 1 Quality Assurance Program. Audit surveillance reports are on file proving Quality Assurance activity in this area. The point of contention surrounds the words used in the Quality Assurance program which stated:

"The identification of structures, systems, and components, which are covered by the Quality Assurance Program is contained in the Engineering Design Procedures."

This refers to Engineering Procedure EP-20, "Procedure for Classification of Materials and Components" and specifically its attachment, The Q List. This document will be revised at the next quarterly update to include transport packages as an item to be covered by the Quality Assurance Program.

ITEM C

10 CFR 71.101(d) states, "The licensee shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Contrary to the above, one licensee employee performing activities affecting quality has not been trained in D.O.T. and NRC regulatory requirements involved in the transfer, packaging and transport of radioactive material to assure that suitable proficiency was achieved and maintained.

RESPONSE

Reference the Quality Assurance site organization dated 2/29/84 (attached); the Niagara Mohawk rad-waste Quality Assurance Program is changed as follows, effective April 30, 1984:

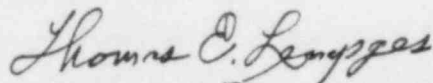
(A) Quality Control inspection will do:

1. Cask receipt inspection.
2. Monitor the torquing of cask bolts and "O" ring/gasket inspection.
3. Monitor the final rad-protection survey completion and placement of rad-waste placards on the truck.

(B) Site Quality Assurance will perform audit/surveillances on approximately 10% of total rad-waste shipments leaving the site (a site audit function).

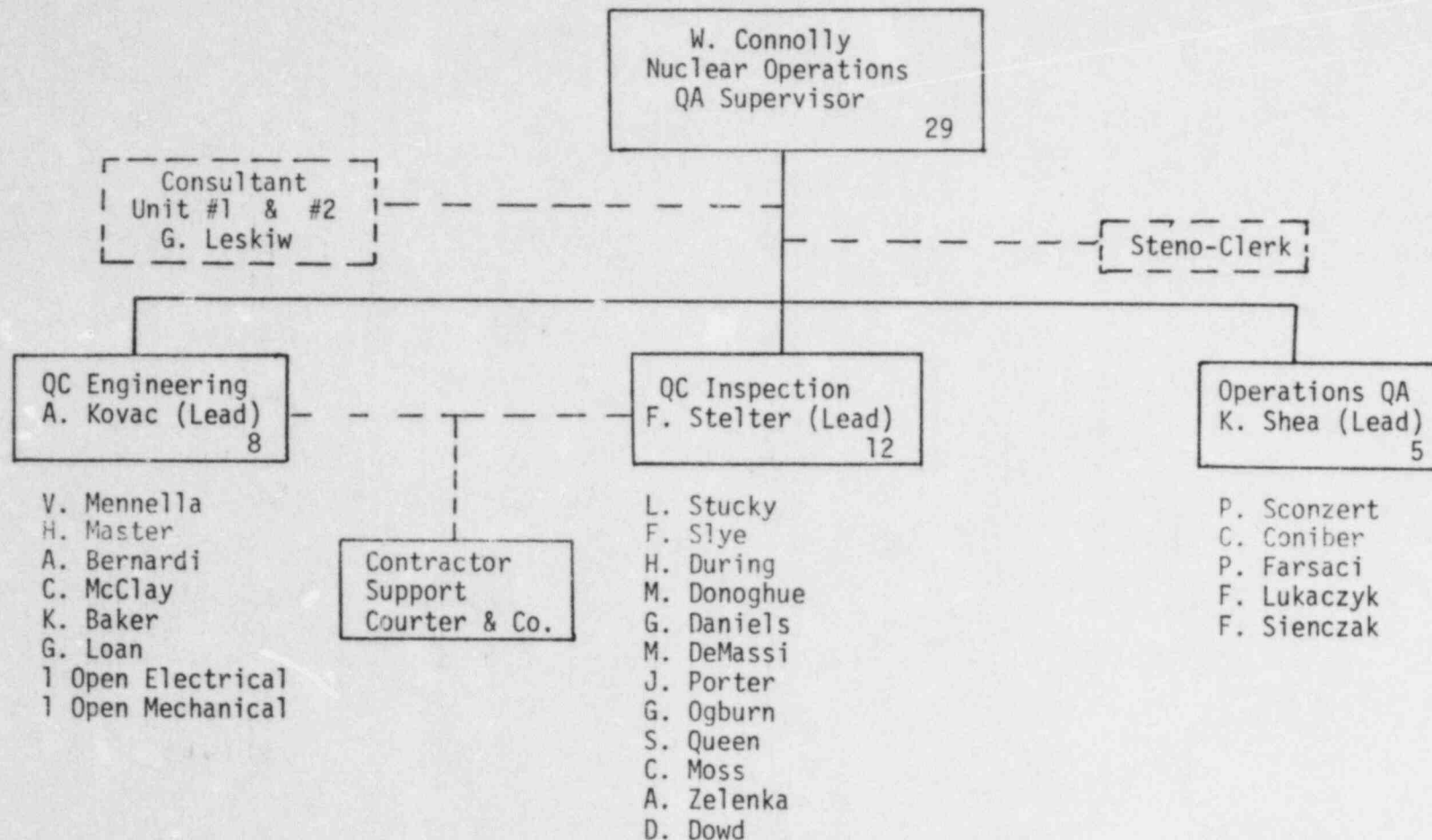
- (C) Corporate Quality Assurance will once a year (plus or minus a quarter of a year) perform an audit on the rad-waste Quality Assurance Program.
- (D) The Quality Control inspectors performing rad-waste inspections will have documented training in D.O.T. and NRC rad-waste regulatory requirements.
- (E) The Quality Assurance site auditors/surveillance personnel and the Corporate audit personnel will have appropriate N45.2.12 and N45.2.23 required training.

Very truly yours,



Thomas E. Lempges
Vice President
Nuclear Generation

TEL/RGR/lo



Proposed by William Connolly Date 2/29/84

Accepted by DR Palm Date 2/29/84