

NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

300 ERIE BOULEVARD WEST
SYRACUSE, N Y 13202

GERALD K. RHODE
SENIOR VICE PRESIDENT

February 15, 1984
(8057)

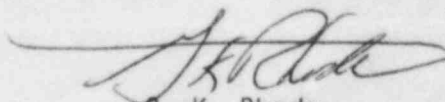
Mr. R. W. Starostecki, Director
U.S. Nuclear Regulatory Commission
Region I
Division of Project and Resident Programs
631 Park Avenue
King of Prussia, PA 19406

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

Dear Mr. Starostecki:

Your Inspection Report No. 83-16 dated December 30, 1983, identified an apparent violation and a deviation resulting from an inspection conducted at Nine Mile Point Unit 2 construction site. Niagara Mohawk's response is enclosed.

Very truly yours,



G. K. Rhode
Senior Vice President

GKR/TL:ja
Enclosure

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PDR ADOCK 05000410
Q PDR

look 2 welds
requested doc., was
presented Aug -023 and
ECN 001-003.

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

Response to Notice of Violation and
Notice of Deviation Attached to NRC
Inspection Report No. 83-16

The apparent violation was identified as follows:

10CFR50, Appendix B, Criteria X and XV, and the Nine Mile Point Unit 2 PSAR require that inspection be provided to assure the conformance of field installations to design drawings and that nonconforming items be promptly identified and dispositioned in accordance with documented procedures. Reactor Controls, Inc. (RCI) Procedure QAI-8-1 requires component supports to be installed in accordance with the design requirements, and Section II of the RCI QA manual states that a nonconformance will be identified via the issuance of a nonconformance report.

Contrary to the above, as of November 10, 1983, field welds for RCI supports depicted on Drawing No. NMP-023 had been accepted by quality control when the configuration of the welds were not in accordance with the design requirements. Upon notification of the nonconforming condition, RCI proceeded to issue an engineering change notice in lieu of the requisite nonconformance report.

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

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

It is Niagara Mohawk's conclusion that the identified field welds were in accordance with design requirements and that a nonconforming condition did not exist. The original weld configuration listed on Drawing No. NMP-023, Sheets 1 and 2, Revision 1, was modified via Engineering Change Notice No. 01-003. - when? The purpose of this change was to provide an alternate (and acceptable) welding configuration for hard to access areas. As a result of the Nuclear Regulatory Commission Inspector's concern that ambiguities existed between the two documents, Reactor Controls, Inc. issued Engineering Change Notice No. 01-055. This Engineering Change Notice was issued for clarification purposes only and not to accept a nonconforming condition as stated in the violation above. This Engineering Change Notice was cancelled (cancellation date December 21, 1983) because it has caused some confusion as to its intent and did not change the design requirements of Engineering Change Notice No. 01-003.

In order to demonstrate the identified welds were in accordance with design requirements, Stone & Webster Engineering Corporation and Reactor Controls, Inc. performed a reinspection of the field welds for Reactor Controls, Inc. supports depicted in Drawing No. NMP-023, Sheets 1 and 2, Revision 1. All welds were acceptable.

The deviation was identified as follows:

FSAR Chapter 1, Table 1.8-1 states that Niagara Mohawk Power Corporation complies with Regulatory Guide 1.94 which endorses ANSI N45.2-1974, Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete, Structural Steel, Soils and Foundations During the Construction Phase of Nuclear Power Plants. The ANSI states that high-strength bolts for steel construction will be installed and inspected in accordance with the AISC Manual of Steel Construction, Specification for Structural Joints Using ASTM A325 or A490 Bolts. Further, the AISC provides a nationally accepted standard code to define the acceptable design, installation and inspection of structural steel installations.

Contrary to the above, as of November 9, 1983, the control rod drive restraint beam assembly was observed to be designed and installed in variance with the AISC high-strength bolting specification for connections involving oversized holes.

The following is submitted in response to this deviation:

General Electric has identified the Control Rod Drive housing restraint beam as a noncode item. Therefore, the AISC is not applicable in its entirety to this component, and no deviation from the Final Safety Analysis Report commitments exists.

The design of the restraint beam does incorporate some requirements of AISC such as bolt torque values, as specified in General Electric design drawing 762E827. Similarly, portions of other standards, such as AWS and ASTM, are also used as a guide in the design of the restraint beam.

To provide additional assurance of the adequacy of the connections, washers will be installed. This action will be completed by June 30, 1984.