



NIAGARA MOHAWK POWER CORPORATION / 300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202 / TELEPHONE (315) 474-1511

April 26, 1984
(NMP2L 0041)

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. 50-410/84-02 dated March 23, 1984 identified one 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,

C. V. Mangan
Vice President
Nuclear Engineering & Licensing

CVM/TL:ja
Enclosure
xc: Mr. R. Gramm, Resident Inspector

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

Response to Notice of Violation
Attached to NRC Inspection Report 84-02

The apparent violation was identified as follows:

As a result of the inspection conducted on February 7 and 9, 1984, and in accordance with the NRC Enforcement Policy (10CFR2, Appendix C) published in the Federal Register on March 9, 1982 (47FR9987), the following violation was identified:

10CFR50, Appendix B, Criterion VI, requires "...that measures shall ensure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed by authorized personnel..." Stone & Webster nonconformance and disposition report (N&DR) specified in Quality Standard (QS-15.1) Revision B, dated December 20, 1983, lists the N&DR form to be used for this site with a detailed procedure for filling in the various blocks of the N&DR form.

Contrary to the above, as of February 9, 1984, and at least since April 6, 1983, the N&DR form being used at this site is not the document listed in the QS-15.1 standard. Also, the instruction for filling out the N&DR form in QS-15.1 is not compatible with the N&DR form presently being used by Stone & Webster's Quality Control organization.

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

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

Stone & Webster Engineering Corporation's Quality Standard No. QS-15.1, Revision A, Change 2 was the only approved Quality Standard in effect between February 10, 1982 and January 15, 1984, for reporting Stone & Webster nonconformances on the Nine Mile Point Unit 2 Project. During the period in question, Nonconformance and Disposition Report form NM-001 was used on the project. (In accordance with QS-5.1, Revision E, an Advanced Project Change Notice (APCN) was issued to allow the use of the project-specific form NM-001.) This form was implemented in response to Nuclear Regulatory Commission Inspection Report 81-10, unresolved item 81-10-01.

On January 16, 1984, Revision B, Change 1 of QS-15.1 became effective. However, because this revision to the Stone & Webster Engineering Corporation corporate Quality Standard (QS) was issued prior to Niagara Mohawk management approval, the new form was not immediately implemented.

This is an isolated incident of not implementing a revision to a procedure in a timely manner.

On February 8, 1984, instructions were issued by the Stone & Webster Engineering Corporation Project Quality Assurance Manager that effective February 10, 1984, the new form (5040.235) contained in QS-15.1, Revision B, Change 1 would be used in processing nonconformances at the site.

In the future, an Advance Project Change Notice (APCN) will be issued identifying specific project considerations to delay implementation of a revised Quality Standard (QS).