



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

June 15, 1984
(NMP2L 0084)

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. 50-410/84-05 dated May 18, 1984, 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,

A handwritten signature in cursive script that reads 'C. V. Mangan'.

C. V. Mangan
Vice President

Nuclear Engineering & Licensing

TL:ja
Enclosure
xc: R. A. 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
No. 50-410/84-05

The alleged violation was identified as follows:

10CFR50, Appendix B, Criterion III and the Nine Mile Point Unit 2 PSAR require that applicable regulatory requirements and design basis are correctly translated into specifications and drawings. Regulatory Guide 1.29 compliance requires that nonsafety items be designed such that their potential seismic failure will not impair the operability of safety-related components.

Contrary to the above, on August 5, 1983 and February 15, 1984, the licensee was informed of two conditions involving control room partition walls and a crane over the emergency diesel generator which were designed as nonseismic items. The potential seismic failure of the aforementioned items could have detrimental effects upon plant safety-related components.

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

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

Root Cause

The root cause of the alleged violation is as follows:

1. Documentation was not generated prior to the issuance of Stone & Webster Engineering Corporation Project Procedure 84 ("Seismic Evaluation and Documentation of Non-Nuclear Safety-Related Components in Nuclear Safety-Related Areas," March 1983) to demonstrate the effects of the failure of a Category II or Category III item over a Category I item.
2. Project Procedure 84 did not require the generation of documentation to demonstrate the effects of the failure of a Category II or Category III item over a Category I item for items evaluated prior to its issuance.

Corrective Action

Control Room/Computer Room Partitions - A 10CFR50.55(e) final report was submitted to the NRC via our letter dated January 9, 1984. The drywall partitions have been redesigned to withstand seismic loads.

Diesel Generator Cranes - This item was reported to the NRC under 10CFR50.55(e). As stated in the interim report, submitted to you via our letter dated April 18, 1984, a final report will be submitted by October 15, 1984.

Preventive Action

1. Project Procedure 84 will be revised by June 30, 1984 to add requirements for backfitting previous seismic evaluations, and to expand on the list of type of Category II and Category III components that must be evaluated.
2. A re-review of Category I areas will be performed to ensure that the documentation required by Project Procedure 84 exists for items evaluated prior to the issuance of Project Procedure 84. This review will be completed by August 15, 1984.