

July 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, PA 19406

Re: Nine Mile Point Unit 1
Docket No. 50-220
Inspection Report 84-09

Dear Mr. Martin:

As requested, this letter responds to the routine safety inspection conducted by E. T. Shaub of your staff from May 29 to June 1, 1984 at Nine Mile Point Unit 1, Scriba, New York, and our corporate office, Syracuse, New York. The inspection report noted one area of noncompliance. Our response to this item is as follows:

Item A

Technical Specification 6.5.2.8.C requires that once per six months, audits be performed under the cognizance of the SRAB (Safety Review and Audit Board) encompassing the results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operations that affect nuclear safety.

Contrary to the above, the SRAB Deficiency Audit dated February 13, 1984 performed to satisfy this Technical Specification, only addressed deficiencies identified in other SRAB audits. The audit did not address nonconformances, audit and surveillance findings, occurrence reports and LER's, and the corrective maintenance system.

Response

The semi-annual Deficiency Audit has been expanded to cover quality assurance nonconformances by way of reviewing the quality assurance audits performed since the previous Deficiency Audit.

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By review of the Safety Review and Audit Board Quality Assurance, Maintenance and Testing Audit, the Deficiency Audit also covers audit and surveillance findings. However, a sample will be reviewed (as the word "audit" implies) and not all audit and surveillance findings.

Occurrence Reports and Licensee Event Reports are reviewed by the Site Operations Review Committee. Documentation of these reviews is delineated in the Site Operations Review Committee (SORC) minutes. The Safety Review and Audit Board (SRAB) reviews Site Operations Review Committee minutes, including results of SORC action on Occurrence Reports. The Safety Review and Audit Board also reviews Licensee Event Reports and their associated Occurrence Reports. In our opinion, there is no need to review these twice by including them in the scope of the semi-annual Deficiency Audits.

By reviewing the Quality Assurance, Maintenance and Testing Audit, the Deficiency Audit covers our corrective maintenance system (i.e., Work Requests). However, this will be a sampling method as the audit and surveillance findings review discussed above.

The expanded scope of the deficiency audit also includes review of any nonconformances resulting from the Quality Assurance audits of Work Requests.

Further, the Site Staff Operations Assessment organization evaluates plant operations for safety. This organization reviews the following (as discussed in Site Administrative Procedure APN-3A):

1. Engineering evaluation of the operating history of the plant (equipment failures, design problems, operations errors, etc.) and Licensee Event Reports from other plants of similar design, with suitable dissemination of the results of such evaluations to other members of the plant staff
2. Engineering evaluation of plant conditions required for maintenance and testing
3. Engineering evaluation of the adequacy of utility policy for maintenance, testing, equipment procurement, etc.
4. Engineering evaluation of continuing adequacy of plant operations quality assurance
5. Engineering evaluation of adequacy of plant emergency and operating procedures.

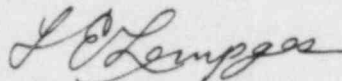
The SORC conducts a special bi-monthly meeting to review the results of these assessments. This review is documented in the SORC minutes which are reviewed by SRAB.

Finally, SRAB reviews NRC Inspection Reports and the action/response to them.

We plan a proposed change in the Technical Specifications to delete the word "all" in Section 6.5.2.8.C. The word "audit" implies not 100% but a sampling review. "All" is an inappropriate adjective describing audits. Revision 2 to the General Electric Boiling Water Reactor (BWR) Technical Specifications (NUREG 0123) is consistent with this change.

We believe with the proposed change in the Technical Specification and expanded scope of the Deficiency Audit, we will be in compliance with Section 6.5.2.8.C of our Technical Specifications.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'T. E. Lempges', written in dark ink.

T. E. Lempges
Vice President
Nuclear Generation

TEL/LMM:ja