



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

November 15, 1984
(NMP2L 0242)

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:

Enclosed is a final report in accordance with 10CFR50.55(e) for the problem concerning installation of Quality Assurance Category I bolted flanged piping joints without a documented procedure. This problem was reported via tel-con to S. Collins of your staff on July 23, 1984. An interim report was submitted via our letter dated August 23, 1984.

Very truly yours,

C. V. Mangan
Vice President
Nuclear Engineering and Licensing

CVM/GG/dd

Enclosure

xc: Director of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555

R. A. Gramm, NRC Resident Inspector

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

Final Report for a Problem
Concerning Bolted Flanged Piping Joints
(55(e)-84-28)

Description of the Problem

The problem concerns the installation of Quality Assurance Category I bolted flanged piping joints by ITT Grinnell without a documented procedure. 10CFR50, Appendix B, Criterion V states, in part, that the activities affecting quality shall be prescribed by documented instructions and procedures. ITT Grinnell Bolting Procedure No. FQC 4.2-25-4 was approved on May 24, 1984. Prior to this procedure, no formal procedure existed establishing requirements for installation and inspection of bolted Category I flanged piping joints.

Analysis of Safety Implications

A detailed analysis of safety implications was not performed to determine the effect of performing Category I work without a documented procedure. ITT Grinnell is an ASME III certificate holder and installer and is required to meet applicable ASME Code and specification requirements. However, a possibility existed that the performance of Category I work without a documented procedure could have increased the possibility of non-conformance with ASME III and hence could have adversely affected the safety of operations of the plant. To preclude this possibility, the corrective actions outlined below have been or will be taken.

Corrective Actions

1. ITT Grinnell has informed Stone and Webster that it has taken or will take the following corrective and preventive actions:
 - a. Bolting Procedure No. FQC-4.2-25 was revised on July 11, 1984, to delineate inspection attributes for previously bolted joints.
 - b. Since May 24, 1984, all new bolted joints have been installed in accordance with FQC-4.2-25. ITT Grinnell Quality assurance performed a surveillance on September 14, 1984, to verify compliance.

- c. The service water lines have been walked down by Quality Control personnel in order to identify previously bolted joints that required rework. This was done prior to release for hydro testing. Engineering has issued new planner packages for joints requiring rework and the rework has been accomplished in accordance with the requirements of FQC-4.2-25, Revision 5. Quality Assurance performed a review of service water documentation on September 14, 1984, to verify that previously accepted bolted joints now have the proper documentation to indicate that FQC-4.2-25 has been implemented properly.
 - d. Rework of the remaining previously bolted joints will be done in accordance with the Boundary Identification Package turnover schedule.
2. Stone and Webster Quality Assurance is revising the existing surveillance check list to include the bolting criteria in its surveillances. This will be completed by December 15, 1984.