



April 24, 2000  
NMP1L 1512

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: Docket No. 50-220  
Licensee Event Report 00-01

Gentlemen:

In accordance with 10 CFR 50.73(a)(2)(i)(B), we are submitting Licensee Event Report 00-01, "Technical Specification Violation When Noble Gas Grab Sample Not Collected Within Time Frame Required by the Limiting Condition For Operation."

Sincerely,

A handwritten signature in black ink that reads "LA Hopkins".

Lawrence A. Hopkins  
Plant Manager - NMP1

LAH/KLE/cr  
Attachment

xc: Mr. H. J. Miller, NRC Regional Administrator  
Mr. G. K. Hunegs, Senior Resident Inspector  
Records Management

Handwritten initials "JE22" in black ink, located in the bottom right corner of the page.

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)

Nine Mile Point Unit 1

DOCKET NUMBER (2)

05000220

PAGE (3)

01 OF 05

TITLE (4) **Technical Specification Violation When Noble Gas Grab Sample Not Collected Within Time Frame Required By The Limiting Condition For Operation**

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE(7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
03	24	00	00	001	00	04	24	00	N/A	
									N/A	

OPERATING MODE (9)

1

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

POWER LEVEL (10)  100%	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(2)(v)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 73.71
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(e)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<i>(Specify in Abstract below and in Text, NRC Form 366A)</i>
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.36(e)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

Carl M. Senska, Manager Chemistry

TELEPHONE NUMBER

(315) 349-1066

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)

NO

EXPECTED SUBMISSION DATE (15)

MONTH

DAY

YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single space typewritten lines) (16)

On March 24, 2000, Nine Mile Point Unit 1(NMP1) was at 100% power with stack effluent monitoring instrumentation inoperable. NMP1 failed to comply with the Limiting Condition for Operation (LCO) specified in Technical Specification 3.6.14.b when a stack grab sample was not obtained within the required time frame of once per 12 hours. The stack grab sample was collected 38 minutes after the 12 hours expired.

The cause was that the impact on priority activities from integration of emergent tasks was not adequately assessed by the technician or supervision. Contributing to this event was the rearranging of tasks to accommodate emergent tasks and inadequate department job coordination.

Immediate corrective actions were to collect and analyze a stack grab sample and to have all dayshift chemistry technicians stop work, discuss the event and validate that the technicians understood the consequences of missing an LCO required action. Additional corrective actions taken include: increased the frequency of LCO required actions; provided guidelines and expectations for scheduling LCO actions and assessing changes to shift work scope; created a Chemistry Shift Scheduling Tool to house the administrative corrective actions and discussed the event with the remainder of chemistry technicians by 31 March 2000.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Nine Mile Point Unit 1	DOCKET NUMBER (2)  05000220	LER NUMBER (6)			PAGE (3)  02 OF 05
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		00 -	01 -	00	

TEXT (If more space is required, use additional NRC Form 366A's) (17)

**I. DESCRIPTION OF EVENT**

On March 24, 2000, Nine Mile Point Unit 1 (NMP1) was at 100% power with stack effluent monitoring instrumentation inoperable. NMP1 failed to comply with the Limiting Condition for Operation (LCO) specified in Technical Specification 3.6.14.b when a stack grab sample was not obtained within the required time frame of once per 12 hours. On March 24, 2000, a stack grab sample had to be collected by 1042 in order to comply with the LCO. However, the stack grab sample was not collected until 1120.

On March 13, 2000, the stack effluent monitoring instrumentation was removed from service for corrective maintenance. With the stack effluent monitoring instrumentation inoperable, Technical Specification Table 3.6.14-2 requires that a stack grab sample be taken once per 12 hours, that samples be continuously collected with auxiliary sampling equipment, that sample flow rate be estimated once per 8 hours and that stack flow be estimated. Shift chemistry technicians perform these actions. The sample flow rate estimation is referred to as a "sample flow check." The sample flow check is done once per 4 hours.

On March 24, 2000, at the 0600 to 1800 shift turnover, the off-going shift technician briefed the oncoming shift technician of the required LCO activities to be preformed during the upcoming shift. These activities were collecting a stack grab sample prior to 1042 and performing stack sample flow checks every 4 hours throughout the shift, beginning at 0640. Performing stack sample flow checks at an increased frequency of once per 4 hours provided 4 hours of margin to the expiration of the LCO required frequency of once per 8 hours. The stack grab samples were being collected once per 12 hours before the end of the 12-hour interval providing very little margin.

The shift technician had planned to collect the stack grab sample when he went to perform the 4-hour stack sample flow check due at 1040. The stack grab sample and the sample flow check are performed in the same general location. After the turnover, the shift technician attended the Operations shift brief in the control room and then began routine duties.

Two emergent tasks were added to the shift technician's daily schedule prior to his performing the 1040 stack sample flow check, and the 1042 stack grab sample. One task which was usually done on Sunday, would need to be done during the 0600 to 1800 shift on Friday (March 24, 2000). During shift rounds, the shift technician became aware of a second task that would need attention during the shift. The shift technician reasoned there was time to perform the second task prior to the required 4-hour sample flow check due at 1040 and 12-hour stack grab sample due at 1042. The impact of the emergent tasks on other shift activities was not discussed with either the supervisor or the chief chemistry technician.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Nine Mile Point Unit 1	DOCKET NUMBER (2)  05000220	LER NUMBER (6)			PAGE (3)  03 OF 05
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		00	- 01	- 00	

TEXT (If more space is required, use additional NRC Form 366A's) (17)

**I. DESCRIPTION OF EVENT (Cont'd)**

The second task was completed at approximately 1015. The shift technician performed some preparatory work in the lab and then proceeded to perform the 4-hour sample flow check. After performing the 4-hour sample flow check, the shift technician left the area, without collecting the 12-hour stack grab sample. Once back in the lab, the shift technician realized that the 12-hour stack grab sample had been missed. The shift technician then returned to the sampling location and collected the sample at 1120. The shift technician's supervisor and the control room were informed that the stack grab sample had not been collected within the required time frame.

**II. CAUSE OF EVENT**

The cause was that the impact on priority activities from integration of emergent tasks was not adequately assessed by the technician or supervision.

Contributing to this event was inadequate department job coordination. Guidance for scheduling LCO required activities was not sufficient to ensure these activities are completed within the LCO specified time frame. Instead of being scheduled at an interval that would have provided some margin, the stack grab sample was planned to be collected only minutes before the LCO time frame would expire.

**III. ANALYSIS OF EVENT**

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications." Technical Specification 3.6.14.b refers to Table 3.6.14-2, "RADIOACTIVE GASEOUS PROCESS AND EFFLUENT MONITORING INSTRUMENTATION," which specifies the radioactive gaseous process and effluent monitoring instrumentation that is required to be operable, and specifies the minimum number of channels operable and describes the actions to be taken when the number of operable channels is below the minimum value. With the Noble Gas Activity Monitor inoperable, Technical Specification Table 3.6.14-2 states in part, that "effluent releases via this pathway may continue provided grab samples are taken once per 12 hours and these samples are analyzed for gross activity within 24 hours." The failure to collect a stack grab sample within the specified time frame without stopping releases is a violation of Technical Specification 3.6.14.b. Sample collection occurred 38 minutes after the expiration of the 12-hour LCO and analysis results were within expected limits. A probabilistic risk analysis of the impact of the missed stack grab sample concluded the event was non-risk significant. Additionally, for the grab sample that was missed, the Improved Technical Specifications would have allowed extending the LCO time frame by 25%. Based on the above, this event did not pose a threat to the health and safety of the public or plant personnel.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Nine Mile Point Unit 1	DOCKET NUMBER (2)  05000220	LER NUMBER (6)			PAGE (3)  04 OF 05
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		00	- 01	- 00	

TEXT (If more space is required, use additional NRC Form 366A's) (17)

**IV. CORRECTIVE ACTIONS**

1. The stack grab sample was collected and analyzed.
2. All dayshift chemistry activities were stopped until a discussion, with all day shift chemistry technicians, of the missed LCO sample was completed. The discussion was to ensure that technicians understood the consequences of missing an LCO required action. The remainder of chemistry technicians was addressed by 31 March 2000.
3. To provide additional margin, the frequency of performance of LCO required actions was increased. Guidelines and expectations for scheduling LCO actions and assessing changes to shift work scope were improved. These guidelines and expectations are captured in a Chemistry Shift Scheduling Tool which has been implemented and placed in the Chemistry Manual. Technicians have been briefed on its use. The tool requires using a form to record the expected start times and duration of shift activities. This provides the shift technician with a visual representation of time requirements for shift activities. As work scope changes, the shift technician consults the scheduling tool to assess the impact on LCO and Technical Specification required activities.
4. Operations, Instrumentation & Controls Maintenance, Radwaste Operations, Security and Radiation Protection Calibration at Nine Mile Point Units 1 and 2 evaluated their programs/processes for susceptibility to similar events. The evaluations concluded that barriers are in place to prevent a similar occurrence.

**V. ADDITIONAL INFORMATION**

A. Failed components: none

B. Previous similar events:

Licensee Event Report 96-07, "Misinterpretation of Technical Specification Action Time Intervals Results in Technical Specification Violation" reported Technical Specification violations resulting from incorrectly applying the 25 percent extension allowed for surveillance requirements to LCO required actions. The event is similar in that LCO time frames were exceeded; however the cause is different. Therefore the corrective actions from Licensee Event Report 96-07 would not have prevented this occurrence.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Nine Mile Point Unit 1	05000220	00	- 01	- 00	05 OF 05

TEXT (If more space is required, use additional NRC Form 366A's) (17)

V. **ADDITIONAL INFORMATION** (Cont'd)

C. Identification of components referred to in this Licensee Event Report:

Component	IEEE 803A Function	IEEE 805 System ID
Stack Effluent Monitoring System	NA	IL
Auxiliary Sampling System	NA	IL
Stack Noble Gas Monitor	MON	IL