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June 12, 2000
NMP2L 1970

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Docket No. 50-410
Licensee Event Report 00-11

Gentlemen:

In accordance with 10 CFR 50.73 (a)(2)(i)(B), we are submitting Licensee Event Report 00-11, "Missed Technical Specification for Primary Containment Integrity Due to a Failure to Revise a Surveillance Procedure After Issuing an Engineering Change Notice."

Very truly yours,

A handwritten signature in cursive script, appearing to read "Richard B. Abbott".

Richard B. Abbott
Vice President, Nuclear Engineering

RBA/CES/tmk
Attachment

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

Handwritten initials "IE22" in a stylized, cursive font.

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 2

DOCKET NUMBER (2)

05000410

PAGE (3)

01 OF 04

TITLE (4)

Missed Technical Specification for Primary Containment Integrity Due to a Failure to Revise a Surveillance Procedure After Issuing an Engineering Change Notice

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)
05	12	00	00	11	00	06	12	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)(1) <input type="checkbox"/> 20.2203(a)(2)(i) <input type="checkbox"/> 20.2203(a)(2)(ii) <input type="checkbox"/> 20.2203(a)(2)(iii) <input type="checkbox"/> 20.2203(a)(2)(iv)		<input type="checkbox"/> 20.2203(a)(2)(v) <input type="checkbox"/> 20.2203(a)(3)(i) <input type="checkbox"/> 20.2203(a)(3)(ii) <input type="checkbox"/> 20.2203(a)(4) <input type="checkbox"/> 50.36(c)(1) <input type="checkbox"/> 50.36(c)(2)		<input checked="" type="checkbox"/> 50.73(a)(2)(i) <input type="checkbox"/> 50.73(a)(2)(ii) <input type="checkbox"/> 50.73(a)(2)(iii) <input type="checkbox"/> 50.73(a)(2)(iv) <input type="checkbox"/> 50.73(a)(2)(v) <input type="checkbox"/> 50.73(a)(2)(vii)		<input type="checkbox"/> 50.73(a)(2)(viii) <input type="checkbox"/> 50.73(a)(2)(x) <input type="checkbox"/> 73.71 <input type="checkbox"/> OTHER <small>(Specify in Abstract below and in Text, NRC Form 366A)</small>	
LICENSEE CONTACT FOR THIS LER (12)										
NAME						TELEPHONE NUMBER				
Stephen Geier - Manager Unit 2 Engineering						(315) 349-7887				
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)						EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)						<input checked="" type="checkbox"/> NO				

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

On May 12, 2000, with the plant at 100 percent power, Niagara Mohawk Power Corporation identified that since initial plant startup, the Primary Containment Isolation Valve 2RHS*V192 was not being verified closed every 31 days as required by Technical Specification Surveillance Requirement 4.6.1.1.b. Not performing the surveillance requirement resulted in not meeting Technical Specification 3.6.1.1, which requires that primary containment integrity be restored within 1 hour or be in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours.

The cause was that an engineering change notice was not implemented into all affected documents (i.e., the surveillance procedure). An opportunity was missed to identify and correct the deficiency when Niagara Mohawk Power Corporation did not properly address a recommendation from a General Physics audit of containment penetrations.

Valve 2RHS*V192 was verified locked closed, and the surveillance procedure was revised to include the valve. Also, a General Physics audit of containment penetrations was reviewed for any other additional containment integrity issues.

NRC FORM 366A U.S. NUCLEAR REGULATORY COMMISSION <div style="text-align: center;"> LICENSEE EVENT REPORT (LER) TEXT CONTINUATION </div>		APPROVED OMB NO. 3150-0104 EXPIRES: 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 2	DOCKET NUMBER (2) 05000410	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="4">LER NUMBER (6)</th> <th>PAGE (3)</th> </tr> <tr> <th style="width: 15%;">YEAR</th> <th style="width: 5%;">-</th> <th style="width: 20%;">SEQUENTIAL NUMBER</th> <th style="width: 5%;">-</th> <th style="width: 15%;">REVISION NUMBER</th> </tr> <tr> <td style="text-align: center;">00</td> <td style="text-align: center;">-</td> <td style="text-align: center;">11</td> <td style="text-align: center;">-</td> <td style="text-align: center;">00</td> </tr> </table>	LER NUMBER (6)				PAGE (3)	YEAR	-	SEQUENTIAL NUMBER	-	REVISION NUMBER	00	-	11	-	00	02 OF 04
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

I. DESCRIPTION OF EVENT

In 1986, Engineering Change Notice RHS-084 was issued to change the position of Valve 2RHS*V192 from normally open to normally locked closed. This change made Valve 2RHS*V192 a containment isolation valve that is required to be verified closed once every 31 days (Technical Specification Surveillance Requirement 4.6.1.1.b). The associated drawing was changed to show the valve locked closed, but Procedure N2-OSP-CNT-M001, "Primary Containment Penetration Verification Test," was not revised to add Valve 2RHS*V192 to the list of valves required to be verified closed once every 31 days.

In November 1993, an audit of containment penetrations was conducted by General Physics. The audit contained a recommendation to add Valve 2RHS*V192 to Procedure N2-OSP-CNT-M001. However, Niagara Mohawk Power Corporation (NMPC) failed to implement this recommendation, because the valve was inadvertently missed during the implementation of corrective actions.

On May 12, 2000, with the plant at 100 percent power, NMPC identified that since initial plant startup, the Primary Containment Isolation Valve 2RHS*V192 was not being verified closed every 31 days as required by Technical Specification Surveillance Requirement 4.6.1.1.b. Not performing the surveillance requirement resulted in not meeting Technical Specification 3.6.1.1, which requires that primary containment integrity be restored within 1 hour or be in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours. After identifying the missed surveillance, the valve position was checked and found locked closed.

II. CAUSE OF EVENT

The cause was that NMPC did not revise all affected documents when Engineering Change Request RHS-084 was issued (i.e., surveillance procedure). An opportunity was missed to identify and correct the deficiency when NMPC did not properly address a recommendation from a General Physics audit on containment penetrations.

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III. ANALYSIS OF EVENT

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), which requires a report for any operation or condition prohibited by the plant's Technical Specifications. Technical Specification Surveillance Requirement 4.6.1.1.b requires that primary containment integrity shall be demonstrated, in part, by verifying, once every 31 days, all primary containment penetrations not capable of being closed by operable containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in position. Valve 2RHS*V192 is not an automatic isolation valve and the penetration path associated with Valve 2RHS*V192 must be closed during accident conditions. Since the valve was not verified closed once every 31 days and the action statement for Technical Specification 3.6.1.1 was not met, this is a Technical Specification violation.

The engineering change notice issued in 1986 required the valve to be locked closed. Since initial plant startup, the valve position has been verified closed in accordance with plant procedures after completion of local leak rate tests, during the integrated leak rate test, and during system valve line-ups following the refueling outages.

On May 12, 2000, when the valve position was checked, it was found locked closed. Based on plant procedures and finding the valve locked closed, there is reasonable assurance that Valve 2RHS*V192 has not been left open or unlocked when required by Technical Specification 3.6.1.1.

NMPC performed a probabilistic risk analysis for this condition and determined that it is non-risk significant.

Based on the information provided above, there were no adverse safety consequences as a result of this event. The missed Technical Specification Surveillance Requirement 4.6.1.1.b did not pose a threat to the health and safety of the general public or plant personnel.

IV. CORRECTIVE ACTIONS

1. NMPC verified that Valve 2RHS*V192 was locked closed.
2. NMPC revised Procedure N2-OSP-CNT-M001 to include Valve 2RHS*V192 as a locked closed valve whose position is to be verified once every 31 days.
3. NMPC reviewed the General Physics audit to determine if any additional containment integrity issues exist. Two potential issues were identified and will be evaluated by June 26, 2000.
4. The current design change control process has been significantly enhanced since 1986.

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V. ADDITIONAL INFORMATION

- A. Failed components: none
- B. Previous similar events:

Licensee Event Report 97-14 documents a Technical Specification violation due to a 1994 modification package that did not identify the need to revise the rod sequence control system test procedure. The corrective actions for Licensee Event Report 97-14 consisted of reviewing test procedures for the rod worth minimizer system and other system test procedures where actual plant configuration is used to prove functionality/operability during testing. The corrective action from Licensee Event Report 97-14 would not have identified the missing valve from Procedure N2-OSP-CNT-M001.

- C. Identification of components referred to in this license event report:

Components	IEEE 803A Function	IEEE 805 System ID
Primary Containment	N/A	NH
Valve	ISV	NH
Penetration	PEN	NH