



November 17, 2000
NMP2L 1997

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

RE: Docket No. 50-410
Licensee Event Report 00-15

Gentlemen:

In accordance with 10 CFR 50.73(a)(2)(i)(B), we are submitting Licensee Event Report 00-15, "Failure to Enter Technical Specification Action Statement at the Correct Point in an Electrical Breaker Switching Sequence, Results in Exceeding Action Statement Allowed Time Frame."

Very truly yours,

A handwritten signature in black ink, appearing to read "M. F. Peckham".

Michael F. Peckham
Plant Manager - NMP2

MFP/CES/kap
Attachment

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

IE22

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)

Failure to Enter Technical Specification Action Statement at the Correct Point in an Electrical Breaker Switching Sequence, Results in Exceeding Action Statement Allowed Time Frame

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)
10	19	00	00	15	00	11	17	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(c)(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(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Larry C. Newman, Manager Operations Unit 2	(315) 349-7372

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 October 19, 2000, at approximately 0130, Nine Mile Point Unit 2 initiated activities to remove 115 KV offsite power source, Line 6, from service for maintenance. Operators recognized that entry into the Action Statement of Technical Specification 3.8.1.1 was required. However, there was an incorrect understanding of which point in the evolution entry into the Action Statement would occur. This resulted in failing to enter the Action Statement at the appropriate point in the evolution which led to exceeding the time frame allowed for completion of the Action Statement requirements. Failing to meet the Action Statement requirements is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B).

The cause of the event was poor work practices in that the relevant documents were not used or followed correctly. A contributing cause was inadequate managerial oversight.

Corrective actions included procedure modifications and briefings of operations personnel.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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FACILITY NAME (1) Nine Mile Point Unit 2	DOCKET NUMBER (2) 05000410	LER NUMBER (6)			PAGE (3) 02 OF 04
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		00	- 15	- 00	

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

I. DESCRIPTION OF EVENT

On October 19, 2000, at approximately 0130, Nine Mile Point Unit 2 (NMP2) initiated activities to remove 115 KV offsite power source, Line 6, from service for maintenance. Two sources of 115 KV offsite power are available at NMP2, which are identified as Line 5 and Line 6. Line 6 normally supplies the 4.16 KV Division II Emergency Switchgear through Reserve Transformer B and Line 5 normally supplies the 4.16 KV Division I Emergency Switchgear through Reserve Transformer A. With an inoperable offsite source of power, entry into Action Statement a. of Technical Specification 3.8.1.1, is required. At approximately 0247, the Plant Monitoring Workstation indicated that Breaker 2ENS*SWG103-4, which connects Line 6 to the Division II Emergency Switchgear, was opened. At this point in the evolution, Action Statement a. of Technical Specification 3.8.1.1, which requires a check of the alignment of the remaining offsite power supplies be performed within one hour, should have been entered. At approximately 0335, Line 6 was removed as a power source to Reserve Transformer B and entry into Action Statement a. of Technical Specification 3.8.1.1 occurred. The required checks of the Action Statement were completed at approximately 0403.

On October 23, 2000, a review of the above-described evolution concluded that entry into the Action Statement of Technical Specification 3.8.1.1 had not occurred at the appropriate point in the evolution, the opening of Breaker 2ENS*SWG103-4. The Action Statement should have been entered at 0247, the alignment checks that are required should have been completed by 0347. The alignment checks were completed at approximately 0403, which exceeded the one hour allowed by Action Statement by approximately 16 minutes.

II. CAUSE OF EVENT

The cause of the event is poor work practices in that both the Work Order and the Precaution/Limitation section of the operating procedure clearly stated when the Line 6 supplied offsite power source should be declared inoperable during the switching sequence. The Work Order also contained a step for the Control Room Supervisor to review the plant impact during the brief. Failure to properly acknowledge the information contained in these documents led directly to the delay in declaring the Line 6 supplied offsite power source inoperable and the entry into the Technical Specification required Action Statement. The Assistant Station Shift Supervisor had an erroneous understanding of when the Line 6 supplied offsite power source was inoperable despite clear statements in the work order plant impact and the operating procedure precaution and limitation. The Assistant Station Shift Supervisor's review of these documents should have been sufficiently thorough, to identify the correct point for entering the Technical Specification Action Statement.

A contributing cause is the lack of adequate managerial oversight. Managerial oversight did not ensure implementation of special evolution controls that were in place to ensure that an adequate technical briefing

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

II. CAUSE OF EVENT (Cont'd)

was conducted, that turnovers transmitted all pertinent information, and that the special evolution was conducted in a manner to ensure compliance with Technical Specifications.

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." This occurred because the operators failed to recognize that entry into the Action Statement of Technical Specification 3.8.1.1 was required. Because the Action Statement was not entered at the appropriate point in the evolution, actions required by the Action Statement were not completed within the required time frame.

Although the breaker alignment checks required by the Action Statement were not completed within an hour, Line 5 was operable and supplying offsite power to the 4.16 KV Division I Emergency Switchgear. Additionally, satisfactory breaker alignment checks were completed within approximately 1 hour and 16 minutes after the plant entered a condition that required the checks, this was approximately 28 minutes after the operators entered the Action Statement. Prior to removing Line 6 for maintenance, a probabilistic risk assessment had been performed to evaluate the risk significance and to provide risk management recommendations. A probabilistic analysis review of the failure to enter the Action Statement of Technical Specification 3.8.1.1 or verify other power sources within one hour concluded that there was no significant impact on the previously performed risk assessment.

Based on the above, this event did not pose a threat to the health and safety of the public or site personnel.

IV. CORRECTIVE ACTIONS

1. Procedure N2-OP-72, "Standby and Emergency AC Distribution System," was modified to add notes prior to steps that render offsite power sources inoperable. The notes identify that performance of the subsequent step renders an offsite power source inoperable and refers to the appropriate Technical Specification.
2. The Assistant Station Shift Supervisor and Reactor Operators involved in this event will prepare a presentation of procedure compliance issues relating to this event. The presentation, as well as the details of this event, will be presented to all operators by December 22, 2000.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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

IV. CORRECTIVE ACTIONS

3. The Station Shift Supervisor and Assistant Station Shift Supervisor will be counseled on the importance of thorough pre-job briefs by December 1, 2000.
4. Operations Management will prepare an assessment of managerial oversight relating to this event and present the assessment to all Senior Reactor Operators by January 12, 2001.

V. ADDITIONAL INFORMATION

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

A Deviation/Event Report (DER) was written on March 30, 1999, describing weaknesses with the implementation of Technical Specification 3.8.1.1 with respect to offsite line availability. The event described in this DER was not a reportable condition. The corrective actions associated with this DER would not have prevented the condition described in LER 00-15, because of the poor work practices identified in LER 00-15.

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

Components	IEEE 803A Function	IEEE 805 System ID
Offsite Power	N/A	FK and EB
Switchgear	SWGR	EB
Breaker	BKR	EB
Transformer	XFMR	EB