



October 27, 2000
NMP1L 1548

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

RE: Docket No. 50-220
Licensee Event Report 00-03

Gentlemen:

In accordance with 10 CFR 50.73(a)(2)(iv), we are submitting Licensee Event Report 00-03, "Reactor Trip on Low Reactor Water Level While Placing the Reactor Water Cleanup System in Service."

Very truly yours,

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

Lawrence A. Hopkins
Plant Manager - NMP1

LAH/CES/cld
Attachment

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

IED2

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 04

TITLE (4) Reactor Trip on Low Reactor Water Level While Placing the Reactor Water Cleanup System In Service

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)
09	27	00	00	03	00	10	27	00	N/A	
									N/A	

OPERATING MODE (9)

5

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

POWER LEVEL (10) 0%	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(2)(v)	<input 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 checked="" 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)	<small>(Specify in Abstract below and in Text, NRC Form 366A)</small>
	<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
David F. Topley, Manager Operations Unit 1	(315) 349 - 1752

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

YES (If yes, complete EXPECTED SUBMISSION DATE)

NO

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

On September 27, 2000 at 0123 hours, while the plant was shutdown, Nine Mile Point Unit 1 experienced a reactor trip. The operators were placing the reactor water cleanup system in service when the reactor tripped on low reactor water level. When the reactor water cleanup system was placed in service, voids in the reactor water cleanup system were filled with reactor water resulting in the reactor water level decreasing to the reactor trip setpoint.

The cause of the reactor trip was a low reactor water level condition due to inadequate filling and venting of the reactor water cleanup system prior to placing the system in service.

The corrective actions will be to revise the procedure used for filling and venting the reactor water cleanup system and reinforce and monitor Operations management expectations regarding the acceptance of inappropriate system operating characteristics and adequacy of contingency planning.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATIONESTIMATED 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 04
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		00	- 03	- 00		

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

I. DESCRIPTION OF EVENT

On September 27, 2000 at 0123 hours, while the plant was shutdown, Nine Mile Point Unit 1 experienced a reactor trip. The operators were placing the reactor water cleanup system in service when the reactor tripped on low reactor water level. When the reactor water cleanup system was placed in service, voids in the reactor water cleanup system were filled with reactor water resulting in the reactor water level decreasing to the reactor trip setpoint of 53 inches.

During the initial three minutes after restoring the reactor water cleanup system, reactor level dropped from approximately 66 to 49.5 inches. In the following four minutes, operators stabilized reactor water level at approximately 55 inches. A standby reactor water cleanup filter that was drained and isolated prior to placing the reactor water cleanup system in service was found filled after the reactor trip. The standby reactor water cleanup filter isolation valves leaked allowing reactor water to fill the drained standby filter and associated piping. The volume of the drained standby filter and associated piping is approximately the same volume as the reactor water level reduction experienced when the reactor water cleanup system was placed in service.

During this event, operators were controlling reactor water level with the control rod drive system. Historically when placing the reactor water cleanup in service, operators have used systems (i.e. condensate system) that have greater makeup capability than the control rod drive system. Previously, during this evolution, with the additional makeup capability, the operators noted an approximately 4-inch reactor water level drop. The operators did not question the reason for the drop in reactor water level and treated it as an expected system response. As a result, the operators did not consider the system being used to control reactor water level as an important factor in determining the amount the reactor level would drop.

II. CAUSE OF EVENT

The cause of the reactor trip was a low reactor water level condition due to inadequate filling and venting of the reactor water cleanup system prior to placing the system in service. Historically, operators were aware of reactor water level decreasing approximately four inches when the reactor water cleanup system was placed in service, but did not recognize this system response as a problem needing resolution. As a result, a significant unexpected level change occurred because of the operator's decision to use the control rod drive system as the sole system to control reactor water level.

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

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Nine Mile Point Unit 1	05000220	00	03	00	03 OF 04

TEXT (If more space is required, use additional NRC Form 306A's) (17)

III. ANALYSIS OF EVENT

The reactor trip is reportable in accordance with 10 CFR 50.73(a)(2)(iv), any event or condition that resulted in a manual or automatic actuation of any engineered safety feature, including the reactor protection system.

The plant was shutdown and all control rods were fully inserted prior to the reactor trip signal. Reactor water level dropped to approximately 49.5 inches and was stabilized at approximately 55 inches in approximately 7 minutes. All Emergency Core Cooling Systems were operable and in standby throughout this event.

Niagara Mohawk Power Corporation performed a probabilistic risk analysis of this event and calculated a core damage probability of 1.0E-7/year.

Based on the information provided above, there were no adverse safety consequences as a result of this event. The reactor trip and recovery posed no threat to the health and safety of the general public or plant personnel.

IV. CORRECTIVE ACTIONS

1. The Operations Department reinforced the expectations for the adequacy of contingency planning during pre-evolution briefings and establishing and maintaining reactor water level control bands.
2. The Operations Manager will reinforce and monitor expectations regarding operator's accepting inappropriate system operating characteristics and the adequacy of contingency planning with appropriate Operation staff members by November 30, 2000.
3. Procedure N1-OP-3, "Reactor Cleanup System," will be revised to fill and vent the standby reactor water cleanup filter and piping by November 30, 2000.
4. Operators will be surveyed in a variety of situations (i.e. simulator, classroom, crew discussions, etc.) to identify any additional inappropriate but commonly known system operating characteristics. This action will be completed by November 30, 2000.

V. ADDITIONAL INFORMATION

- A. Failed components: None
- B. Previous similar Events: None

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		00	03	00	

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 license event report:

COMPONENT	IEEE 803A FUNCTION	IEEE 805 SYSTEM ID
Emergency Core Cooling Systems	N/A	BL, BM
Control Rods	ROD	AA
Reactor Water Cleanup System	N/A	CE
Filter	FLT	CE
Piping	N/A	CE
Control Rod Drive System	N/A	AA
Condensate System	N/A	SD