Mark D. Flaherty Plant General Manager

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a joint venture of	
Constellation Energy	So edf

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October 5, 2011

U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

ATTENTION: Document Control Desk

SUBJECT: Nine Mile Point Nuclear Station Unit No. 2; Docket No. 50-410

> Licensee Event Report 2011-002, Reactor Shutdown due to Reactor Coolant System Unidentified Leakage Above Technical Specification Limits

In accordance with 10 CFR 50.73(a)(2)(i)(A), please find attached Licensee Event Report 2011-002, Reactor Shutdown due to Reactor Coolant System Unidentified Leakage Above Technical Specification Limits.

There are no regulatory commitments in this submittal.

Should you have questions regarding the information in this submittal, please contact John J. Dosa, Director Licensing, at (315) 349-5219.

Very truly yours,

Palke ALK FLAHERTY

MDF/RJC

Attachment: Licensee Event Report 2011-002, Reactor Shutdown due to Reactor Coolant System Unidentified Leakage Above Technical Specification Limits

cc:

NRC Project Manager NRC Resident Inspector NRC Regional Administrator

JEdd, NIRA

ATTACHMENT

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LICENSEE EVENT REPORT 2011-002

REACTOR SHUTDOWN DUE TO UNIDENTIFIED REACTOR COOLANT SYSTEM LEAKAGE ABOVE TECHNICAL SPECIFICATION LIMITS

NRC FORM 366 (10-2010)			U.S. NUCLEAR REGULATORY COMMISSION				APPROVED BY OMB: NO. 3150-0104 EXPIRES: 10/31/2013								
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)					5 5 1 1 1	Estimated burden per response to comply with this mandatory collection request 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is no required to respond to, the information collection.									
1. FACILIT								2			ER 3	. PAGE			
Nine M 4. TITLE	Alle Po	oint Unit	2						020	00410			1 of 5		
	ctor Shi	utdown	Due to	Reactor Co	olant	System	Uniden	tified L	eakag	e Above]	Fechnical S	specification	n Limits	;	
5. E\	VENT DA	ATE	6.	LER NUMBER	2	7. R	EPORT D	ATE			OTHER FA	CILITIES INVO			
	DAY			SEQUENTIAL	REV				FACILI	TY NAME			DOCKET N	UMBER	
MONTH	DAY	YEAR	YEAR	NUMBER	NO.	MONTH	DAY	YEAR			None		NA		
08	06	2011	2011	002	00	10	05	2011	1 FACILITY NAME None			DOCKET NUMBER			
9. OPERA	TING M	ODE	11. THIS	S REPORT IS	SUBN	AITTED PU	JRSUANT	TO THE	REQU	IREMENTS	OF 10 CFR§:	(Check all th	at apply)		
	1			2201(b)		20.2203(a)(3)(i)							73(a)(2)(vii)		
	1	l		2201(d) 2203(a)(1)		20.2203(a)(3)(ii) 20.2203(a)(4)							0.73(a)(2)(viii)(A) 0.73(a)(2)(viii)(B)		
10. POWE				203(a)(1) 203(a)(2)(i)		$ \boxed{\begin{array}{c} 20.2203(a)(4)} \\ \hline{} 50.36(c)(1)(i)(A) \\ \hline{} 50.73(a)(2)(ii)(B) \\ \hline{} 50.73(a)(2)(ii) \\ \hline{} 50.73(a)(ii) \\ \hline{} 50.73$									
		- !		2203(a)(2)(ii)		50.36(c)(1)(ii)(A)			$\Box 50.73(a)(2)(iv)(A)$			$\Box 50.73(a)(2)(x) \Box 73.71(a)(4)$			
	100			2203(a)(2)(iii) 2203(a)(2)(iv)			50.36(c)(2) 50.46(a)(3)		☐ 50.73(a)(2)(v)(A) ☐ 50.73(a)(2)(v)(B)			☐ 73.71(a)(4) ☐ 73.71(a)(5)			
				2203(a)(2)(v) 🛛 50.73(a)(2)()(i)(A)	50.73(a)(2)(v)(C)							
			20.2	2203(a)(2)(vi)		50	0.73(a)(2)((i)(B)	I	□ 50.73(a)	(2)(v)(D)	Specif or in N	y in Abstrac RC Form 3	t below 66A	
			<u> </u>		1	12. LICENS	SEE CON	TACT FC	RTHIS	S LER					
NAME											TELE	PHONE NUMBER	(Include Are	a Code)	
John J.	Dosa, J	Director	Licens	ing							(3	15) 349-521	9		
			13. CON	MPLETE ONE	LINE	FOR EAC	н сомрс		AILURI	E DESCRIB	ED IN THIS R	EPORT			
CAUS	SE	SYSTEM	Сомро	NENT MAN FACTU		REPOR TO E	RTABLE EPIX	CA	USE	SYSTEM	COMPONENT	MANU- FACTURER		ORTABLE O EPIX	
x		AD	VL	V Ancl Darl		>	Y								
		14.	SUPPLE	EMENTAL REI	PORT	EXPECTE	ED				KPECTED	MONTH	DAY	YEAR	
🗌 YES	; (If yes, +	complete	15. EXPE	ECTED SUBMI	issio	N DATE)			c		MISSION DATE	NA	NA	NA	
ABSTRAC	CT (Limit	to 1400 sj	paces, i.e	e., approximate	əly 15	single-spa	ced typew	ritten line	es)						
At 015	52 on A	ugust 6	, 2011,	the contain	ment	gaseous	s radiatic	on moni	tors w	vent into a	larm and it	was identi:	fied that	Reactor	
				entified leak			easing.	At 020	5, a T	echnical S	Specificatio				
	10		• •		1	.1	11.	·	DOC	· · · ·	~ 11 1	1 1 /	11 26		

Coolant System (RCS) unidentified leakage was increasing. At 0205, a Technical Specifications Condition was entered for RCS unidentified leakage increase above the specified limit. The RCS unidentified leakage peaked at 11.35 gpm, which resulted in an Unusual Event being declared due to reaching an Emergency Action Level (unidentified leakage greater than 10 gpm). At 0227, commenced lowering reactor power. Reactor power was reduced to 20% and, at 0941, the Reactor Protection System was manually actuated by placing the reactor mode switch in the Shutdown position. The unidentified leakage was due to a packing leak from the "A" RCS pump discharge blocking valve. The cause of the packing leak was determined to be vibration/turbulent flow that caused packing relaxation and failure. The valve packing was replaced, torqued and the gland follower nuts were secured in place. The packing for other similar valves was retorqued and the gland follower nuts were secured in place.

A Preventive Maintenance Surveillance Test (PMST) activity will be created to re-torque the packing for RCS pump blocking valves every two years. Additionally, a modification will be implemented to install a live loading design on the RCS pump blocking valves in an upcoming outage.

There have been two other similar LERs involving RCS valve packing leakage: Nine Mile Point Unit 1 LER-2006-001 and Nine Mile Point Unit 2 LER-2001-007.

				UCLEAR RE	EGULAT	ORY CC	MMISS
	EE EVENT RE	•	ER)				
1. FACILITY NAME	2. DOCKET		LER NUMBER			3. PAG	θE
Nine Mile Point Unit 2	05000410	YEAR SEQUENTIAL NUMBER		REVISION NUMBER	2	OF	5
		2011	002	00			
RRATIVE							
I. DESCRIPTION OF EVENT							
A. PRE-EVENT PLANT CONDITIONS:							
Prior to this event, Nine Mile Point Unit 2 (1 inoperable systems affecting this event.	NMP2) was oper	ating and st	able at 100 p	ercent pov	ver witl	h no	
B. EVENT:							
Reactor Coolant System (RCS) unidentified Condition B was entered for an RCS uniden within the previous 24 hours). With either th unidentified leakage increase not identified 3 within 12 hours and in Mode 4 within 36 h unidentified leakage exceeded the 5 gpm un leakage peaked at 11.35 gpm, which resulted Action Limit (unidentified leakage greater th Reactor Protection System (RPS) was manu position, scramming the plant. The Unusual	tified leakage in he unidentified I within 4 hours, 7 nours. At 0227, identified leakag 1 in Unusual Evo nan 10 gpm). Re ally actuated by	crease not v eakage not 'S 3.4.5 Cop power reduce limit of T ent being de eactor powe placing the	vithin limit (i. reduced to windition C required to commerce S 3.4.5. At 0 relared due to r was reduced reactor mode	ncrease gr ithin limit uires the p nced. At ()317, RCS reaching d to 20% a	eater th or the s lant to 241, R uniden an Eme and, at (an 2 g source be in N CS atified ergency 0941, t	pm of the Mode
Following the initial drywell entry, it was de Reactor Coolant Pump "A" discharge blocki			the leakage v	vas from f	ailed pa	acking	on
There was no impact on Nine Mile Point Un	it 1 (NMP1) fro	m this even	t.				
C. INOPERABLE STRUCTURES, COMPONI	ENTS OR SYS						
	, on 0101	TEMS THA	T CONTRIE	UTED TO) THE	EVEN	T:
There were no inoperable components or sys				UTED TO	O THE	EVEN	T:
There were no inoperable components or sys D. DATES AND APPROXIMATE TIMES OF	stems that contri	buted to this	s event.				·
	tems that contri	buted to this	s event. (note: all tin	nes are on	August	: 6, 201	1):
 D. DATES AND APPROXIMATE TIMES OF 0152 - Containment gaseous radiation monit 	MAJOR OCCU itors went into al	outed to this RRENCES arm and RC ed for RCS	s event. (note: all tin CS unidentific unidentified	nes are on ed leakage	August was no	6, 201	1): be
 D. DATES AND APPROXIMATE TIMES OF 0152 - Containment gaseous radiation moning increasing. 0205 - Technical Specification 3.4.5 Conditional Specification (2005) 	MAJOR OCCU itors went into al	outed to this RRENCES arm and RC ed for RCS	s event. (note: all tin CS unidentific unidentified	nes are on ed leakage	August was no	6, 201	1): be
 D. DATES AND APPROXIMATE TIMES OF 0152 - Containment gaseous radiation moning increasing. 0205 - Technical Specification 3.4.5 Condition the limit of less than or equal to 2 groups of th	MAJOR OCCU itors went into all iton B was enter om within the pr	outed to this RRENCES arm and RC ed for RCS evious 24 h	s event. (note: all tin CS unidentified unidentified ours.	nes are on ed leakage leakage in	August was no crease i	6, 201	1): be
 D. DATES AND APPROXIMATE TIMES OF 0152 - Containment gaseous radiation monincreasing. 0205 - Technical Specification 3.4.5 Condition the limit of less than or equal to 2 gp 0227 - Power reduction commenced. 	MAJOR OCCU MAJOR OCCU itors went into all tion B was enter- om within the pr ded the 5 gpm u	outed to this RRENCES arm and RC ed for RCS evious 24 h	s event. (note: all tin CS unidentified unidentified ours.	nes are on ed leakage leakage in	August was no crease i	6, 201	1): be

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		2011	002	00	3		3	

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D. DATES AND APPROXIMATE TIMES OF MAJOR OCCURRENCES (cont.):

0606 - Reactor power was reduced to 55% and feedwater pump "B" was removed from service.

- 0941 Reactor power was reduced to approximately 20% power and the reactor mode switch was placed in the Shutdown position.
- 1127 The Unusual Event was terminated due to being in Mode 3, Hot Shutdown. Emergency Action Level 2.1.1 only applies in Modes 1 and 2.

E. OTHER SYSTEMS OR SECONDARY FUNCTIONS AFFECTED:

None.

F. METHOD OF DISCOVERY:

At 0152 on August 6, 2011, Operations noted that the containment gaseous radiation monitors went into alarm and the RCS unidentified leakage was increasing.

G. MAJOR OPERATOR ACTION:

When it was noted that the RCS unidentified leakage was rising, TS 3.4.5 Condition B was entered for RCS unidentified leakage increase not within the limit of less than or equal to 2 gpm within the previous 24 hours. Reactor power was lowered. The RCS unidentified leakage peaked at 11.35 gpm at which time an Unusual Event was declared due to reaching an Emergency Action Limit (unidentified leakage greater than 10 gpm). Reactor power was reduced to 20% and the RPS was manually actuated by placing the reactor mode switch in the Shutdown position.

H. SAFETY SYSTEM RESPONSES:

All safety systems responded per design. The Reactor Core Isolation Cooling (RCIC) system was started for pressure control. When the reactor water level reached level 8, the steam admission valve closed per design. There was no loss of offsite power to the onsite emergency buses and the Emergency Core Cooling Systems (ECCS) were available, but not called upon to support the safe shutdown of the reactor.

II. CAUSE OF THE EVENT:

The cause of the event falls under NUREG-1022 cause code X (Other). The cause of the RCS unidentified leakage was determined to be vibration/flow turbulence that reduced the packing stress of the RCS pump discharge blocking valve, 2RCS*MOV18A (unanticipated interaction of system or components). It was determined from torque values taken after the event that vibration and flow turbulence had caused the packing to relax and fail on 2RCS*MOV18A.

Prior to 2002, there had been reactor coolant blocking valve packing leak issues at NMP2. A root cause analysis performed in 2001 determined that the problem was caused by loss of gland stress due to packing ring extrusion into the leak-off port. Vibration was not listed as a cause or contributor. Based on the subsequent satisfactory

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NARRATIVE

performance of the reactor cooling pump blocking valves, it was believed that the corrective actions from the 2001 analysis had been effective.

This event was entered into the NMPNS corrective action program (Condition Reports CR-2011-007143 and CR-2011-007171).

III. ANALYSIS OF THE EVENT:

This event involved "The declaration of any of the Emergency Classes specified in the licensee's approved Emergency Plan" and "The initiation of any nuclear plant shutdown required by the plant's Technical Specifications." The notifications per 10 CFR 50.72(a)(1)(i) and 10 CFR 50.72(b)(2)(i) were completed on August 6, 2011, at 0405.

This event is reportable in accordance with 10 CFR 50.73 (a)(2)(i)(A), "The completion of any nuclear plant shutdown required by the plant's Technical Specifications."

There were no systems inoperable and no system failures related to this event. There were no actual safety consequences from this event. The leakage was from the blocking valve packing and was not indicative of RCS component wear. The leakage was contained within the drywell. The maximum leakage rate noted during this event was 11.35 gpm. Even if the packing had catastrophically failed, the leakage would still have been contained within the drywell and the plant would have been capable of reaching a safe shutdown condition. There were no system failures that prevented the safe shutdown of the plant. It is therefore concluded that even if a design basis accident had occurred concurrent with this event, all safety systems would have operated to safely mitigate the event. Based on the above considerations, the safety significance of this event is very low, and the event did not pose a threat to the health and safety of the public or plant personnel.

This event does not affect the NRC Regulatory Oversight Process (ROP) Index for Unplanned Scrams because the scram was taken as part of the normal shutdown procedure steps to meet the TS Required Action. This event increases the NRC Regulatory Oversight Process (ROP) Index for Unplanned Power Changes per 7000 Critical Hours from 0.8 to 1.62. The Green-to-White threshold value for this ROP indicator is greater than 6. As such, the event will not result in entry into the "Increased Regulatory (White) Response Band."

IV. CORRECTIVE ACTIONS:

A. ACTION TAKEN TO RETURN AFFECTED SYSTEMS TO PRE-EVENT NORMAL STATUS:

- 1. The packing on 2RCS*MOV18A was replaced, torqued, and the gland follower nuts were secured in place.
- 2. The packing for the following valves was re-torqued and gland follower nuts were secured in place: 2RCS*MOV18B, and similar RCS pump suction blocking valves 2RCS*MOV10A and 2RCS*MOV10B.

During start-up, during the 900 pound inspection, no leaks were found at any of the four RCS blocking valves.

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B. ACTION TAKEN OR PLANNED TO PREVENT RECURRENCE:

- 1. A Preventive Maintenance Surveillance Test (PMST) activity will be created to re-torque the packing for RCS pump suction and discharge blocking valves 2RCS*MOV18A(B) and 2RCS*MOV10A(B) every two years.
- 2. A modification will be implemented to install a live loading packing gland design on the Unit 2 pump discharge blocking valves, 2RCS*MOV18A(B), in an upcoming outage.

V. ADDITIONAL INFORMATION:

A. FAILED COMPONENTS:

None

B. PREVIOUS LERS ON SIMILAR EVENTS:

There are two LERs that are similar to this one:

- 1. NMP1 LER-2006-001. On June 10, 2006, NMPNS commenced a planned downpower to perform a drywell entry to determine the cause of increased drywell leakage. The source of the increased leakage was determined to be the reactor coolant system drain valve packing. The cause of the packing leak was installation of incorrect packing in March 1997. The packing that was installed did not have the same diameter as the inside diameter of the stuffing box. During the shutdown, NMPNS replaced the packing in the leaking RCS pump drain valve.
- 2. NMP2 LER-2001-007. On December 15, 2001, NMPNS identified drywell floor drain leakage approaching the maximum limits of TS 3.4.5 Condition B for unidentified drywell leakage. The cause of the unidentified leakage was determined to be failed packing in a reactor coolant system discharge blocking valve, 2RCS*MOV18A. The corrective actions included repacking the valve to stop the leakage and retorquing the remaining similar valves in the RCS to protect against leakage. The primary cause of the packing failure was determined to be packing ring extrusion into the leak off port.

C. THE ENERGY INDUSTRY IDENTIFICATION SYSTEM (EIIS) COMPONENT FUNCTION IDENTIFIER AND SYSTEM NAME OF EACH COMPONENT OR SYSTEM REFERRED TO IN THIS LER:

COMPONENT	IEEE 803	IEEE 805	PART
	COMPONENT IDENTIFIER	SYSTEM IDENTIFICATION	NUMBER
Reactor Coolant Blocking Va	lves V	AD	24x20x24-900
Reactor Protection System	NA	JC	

D. SPECIAL COMMENTS:

None