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CENGSM

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NINE MILE POINT
NUCLEAR STATION

January 31, 2014

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

ATTENTION: Document Control Desk

SUBJECT: Nine Mile Point Nuclear Station Unit 2
Renewed Facility Operating License No. NPF-69
Docket No. 50-410

Licensee Event Report 2013-005, Secondary Containment Inoperabilities Due to Differential Pressure Not Meeting Technical Specification Surveillance Requirement 3.6.4.1.1

In accordance with 10 CFR 50.73(a)(2)(v)(C), please find attached Licensee Event Report 2013-005, Secondary Containment Inoperabilities Due to Differential Pressure Not Meeting Technical Specification Surveillance Requirement 3.6.4.1.1.

There are no regulatory commitments in this submittal.

Should you have questions regarding the information in this submittal, please contact Everett (Chip) Perkins, Director Licensing, at (315) 349-5219.

Sincerely,

JJS/JBH

Attachment: Licensee Event Report 2013-005, Secondary Containment Inoperabilities Due to Differential Pressure Not Meeting Technical Specification Surveillance Requirement 3.6.4.1.1

cc: NRC Project Manager
NRC Resident Inspector
NRC Regional Administrator

Nine Mile Point Nuclear Station, LLC
P.O. Box 63, Lycoming, NY 13093

IE22
NRR

ATTACHMENT

LICENSEE EVENT REPORT 2013-005

**SECONDARY CONTAINMENT INOPERABILITIES DUE TO
DIFFERENTIAL PRESSURE NOT MEETING TECHNICAL
SPECIFICATION SURVEILLANCE REQUIREMENT 3.6.4.1.1**

**Nine Mile Point Nuclear Station, LLC
January 31, 2014**

LICENSEE EVENT REPORT (LER)
(See reverse for required number of digits/characters for each block)

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 not required to respond to, the information collection.

1. FACILITY NAME Nine Mile Point Unit 2	2. DOCKET NUMBER 05000410	3. PAGE 1 OF 5
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4. TITLE
Secondary Containment Inoperabilities Due to Differential Pressure Not Meeting Technical Specification Surveillance Requirement 3.6.4.1.1

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
12	11	2013	2013	005	00	1	31	2014	NA	NA
									FACILITY NAME	DOCKET NUMBER
									NA	NA

9. OPERATING MODE 1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§: (Check all that apply)									
10. POWER LEVEL 100	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)						
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)						
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)						
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)						
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)						
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)						
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)						
<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input checked="" type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER							
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A							

12. LICENSEE CONTACT FOR THIS LER

NAME Everett Perkins, Director - Licensing	TELEPHONE NUMBER (Include Area Code) (315) 349-5219
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX
A	NG	BLDG	NA	N	NA	NA	NA	NA	NA

14. SUPPLEMENTAL REPORT EXPECTED	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	NA	NA	NA

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On December 11, 2013 it was discovered that Nine Mile Point Unit 2 (NMP2) has not been reporting Secondary Containment inoperabilities to the Nuclear Regulatory Commission (NRC) in accordance with the administrative guidance in NUREG-1022 (Revision 3). This condition has occurred numerous times within the past three years when the Secondary Containment has been declared inoperable as a result of the Secondary Containment differential pressure (dP) dropping below the required Technical Specification (TS) minimum value of negative 0.25 inches water gauge. These historical events are reportable in accordance with 10 CFR 50.73(a)(2)(v)(C) as conditions that could have prevented the fulfillment of the safety function of a structure or system needed to control the release of radioactive material.

In each of these occurrences the safety function of the Secondary Containment remained available.

The apparent cause of these events is that training has not been effective in providing personnel the level of understanding required in order to consistently recognize when the failure of safety systems are reportable under 10 CFR 50.72(b)(3)(v)(C) and 50.73(a)(2)(v)(C).

Corrective actions include briefings and detailed training on 10 CFR 50.72(b)(3)(v)(C) and 50.73(a)(2)(v)(C) reporting requirements.

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

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Nine Mile Point Unit 2	05000410	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 5
		2013	005	00	

NARRATIVE

I. DESCRIPTION OF EVENT

A. PRE-EVENT PLANT CONDITIONS:

Prior to the event, Nine Mile Point Unit 2 (NMP2) was operating at rated reactor power.

B. EVENT:

On December 11, 2013 it was discovered that Nine Mile Point Unit 2 (NMP2) has not been reporting Secondary Containment inoperabilities to the Nuclear Regulatory Commission (NRC) in accordance with the administrative guidance in NUREG-1022 (Revision 3), and 10 CFR 50.72(b)(3)(v)(C) and 50.73(a)(2)(v)(C) as a condition that could have prevented the fulfillment of the safety function of a structure or system needed to control the release of radioactive material. This condition has occurred numerous times within the past three years when the Secondary Containment has been declared inoperable as a result of the Secondary Containment differential pressure (dP) dropping below the required Technical Specification (TS) minimum of negative 0.25 inches water gauge.

The direct causes of the Secondary Containment dP dropping below the required TS minimum value have been attributed predominantly due to changes in outdoor environmental conditions (changing wind direction and velocity) and secondarily due to changing of lineups or equipment failures associated with the normal non-safety related Reactor Building Ventilation System. In each case the required TS Limiting Condition for Operation (LCO) action was entered and subsequently exited once the Secondary Containment dP was restored to above the required TS minimum value. In all cases the TS required completion time was not exceeded.

Nine Mile Point Unit 1 (NMP1) was unaffected by the occurrences of Secondary Containment inoperabilities at NMP2. While NMP1 Secondary Containment dP is impacted by similar changes in outdoor environmental conditions (changing wind direction and velocity) and the changing of lineups or equipment failures associated with the normal non-safety related Reactor Building Ventilation System, NMP1 does not have a TS Surveillance Requirement for Secondary Containment dP.

C. INOPERABLE STRUCTURES, COMPONENTS, OR SYSTEMS THAT CONTRIBUTED TO THE EVENT:

There were no other inoperable structures, components, or systems that contributed to the event.

D. DATES AND APPROXIMATE TIMES OF MAJOR OCCURRENCES:

Over the past three years there have been numerous occasions when the NMP2 Secondary Containment has been declared inoperable, when the station was in a condition requiring it to be operable, due to the Secondary Containment differential pressure dropping below the required Technical Specification (TS) minimum of negative 0.25 inches water gauge.

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E. OTHER SYSTEMS OR SECONDARY FUNCTIONS AFFECTED:

No other systems or secondary functions were affected.

F. METHOD OF DISCOVERY:

On December 11, 2013 during review of industry Operating Experience (OE) it was identified that NMP2 has not been reporting occurrences of Secondary Containment inoperability when the Secondary Containment differential pressure (dP) drops below the required Technical Specification (TS) minimum of negative 0.25 inches water gauge.

G. MAJOR OPERATOR ACTION:

No operator actions were required as a result of the identification of this condition.

H. SAFETY SYSTEM RESPONSES:

No operational conditions requiring the response of safety systems occurred as a result of this condition.

II. CAUSE OF EVENT:

The apparent cause of these occurrences is that training has not been effective in providing operations personnel the level of understanding required in order to consistently recognize when the failure of safety systems are reportable under 10 CFR 50.72(b)(3)(v)(C) and 50.73(a)(2)(v)(C).

This event has been entered into the Nine Mile Point Nuclear Station corrective action program as condition report number CR-2013-010111.

III. ANALYSIS OF THE EVENT:

This event is reportable in accordance with 10 CFR 50.73(a)(2)(v)(C) as any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to control the release of radioactive material.

There were no actual nuclear safety consequences associated with this event. The times when Secondary Containment was declared inoperable in the past three years, when required to be operable, were due to Secondary Containment differential pressure dropping below the required TS minimum value of negative 0.25 inches water gauge.

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The direct causes of the Secondary Containment dP dropping below the required TS minimum value have been attributed predominantly due to changes in outdoor environmental conditions (changing wind direction and velocity) and secondarily due to changing of lineups or equipment failures associated with the normal non-safety related Reactor Building Ventilation System. In each case the required TS Limiting Condition for Operation (LCO) action was entered and subsequently exited once the Secondary Containment dP was restored to above the required TS minimum value. In all cases the TS required completion time was not exceeded.

In all cases, the Secondary Containment structural integrity, the ability to automatically isolate the non-safety related Reactor Building Ventilation System, and the Standby Gas Treatment System operability were not impacted. As a result, the ability of the Secondary Containment to perform its safety function was not impacted.

Based on the above discussion, it is concluded that the safety significance of this event is 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) Indicators.

IV. CORRECTIVE ACTIONS:

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

In each of the occurrences within the past three years the Secondary Containment was declared operable following the restoration of the Secondary Containment differential pressure to at least the required TS minimum value.

B. ACTION TAKEN OR PLANNED TO PREVENT RECURRENCE:

1. Senior Reactor Operators have been provided a briefing on the guidance in NUREG-1022 (Revision 3) associated with 10 CFR 50.72(b)(3)(v)(C) and 50.73(a)(2)(v)(C) reporting requirements relative to Secondary Containment inoperability.
2. Detailed training on 10 CFR 50.72(b)(3)(v)(C) and 50.73(a)(2)(v)(C) reporting requirements will be conducted for Senior Reactor Operators and Licensed Operator Training Instructors.

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V. ADDITIONAL INFORMATION:

A. FAILED COMPONENTS:

There were no other failed components that contributed to this event.

B. PREVIOUS LERs ON SIMILAR EVENTS:

Nine Mile Point (NMP) has had previous LERs associated with not initially identifying reportable conditions under 10 CFR 50.72(b)(3)(v) and 10 CFR 50.73(a)(2)(v). Specifically at Nine Mile Point 1 (NMP1) LER 2012-003 was issued when Shutdown Cooling Primary Containment Isolation Valves were de-energized in an open position effectively defeating the isolation safety function. At NMP2, LER 2011-004 was issued when during trouble-shooting, Reactor Water Cleanup System delta-flow Isolation Instrumentation was defeated.

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

<u>COMPONENT</u>	<u>IEEE 803 FUNCTION IDENTIFIER</u>	<u>IEEE 805 SYSTEM IDENTIFICATION</u>
Reactor Building (BWR)	BLDG	NG
Reactor Building Ventilation System	PDIC	VA

D. SPECIAL COMMENTS:

None