

UNITED STATES
ATOMIC ENERGY COMMISSION
DIVISION OF COMPLIANCE
REGION I
970 BROAD STREET
NEWARK, NEW JERSEY 07102

AREA CODE: 201-
TELEPHONE: 645-

IN REPLY REFER TO:

AUG 10 1972

Niagara Mohawk Power Corporation
Attention: Mr. F. J. Schneider
Vice President - Operations
300 Erie Boulevard West
Syracuse, New York 13202

Docket No. 50-220

References: Your letter dated August 3, 1972
In response to our letter dated July 17, 1972

Gentlemen:

Thank you for your letter informing us of the action you have taken to correct the items of noncompliance which we brought to your attention following our recent inspection of your licensed program. Your corrective action will be verified during our next inspection of your program.

Paragraph 6.1.b.(1) of your Technical Specifications specifies that the organization of the Nine Mile Point Nuclear Station includes a Station Superintendent, an Assistant Station Superintendent, an Operations Supervisor and other key positions. With respect to your statement concerning Item 3 in your letter dated August 3, 1972 stating that the necessary papers requesting a Technical Specification change have been prepared and "...should be in the hands of DRL by August 11, 1972", we wish to reiterate our position that operation with the organization described in your letter of February 17, 1972 is considered to be in noncompliance with AEC regulations until your request for a change in your Technical Specifications is approved. This matter is under continuing review by this office.

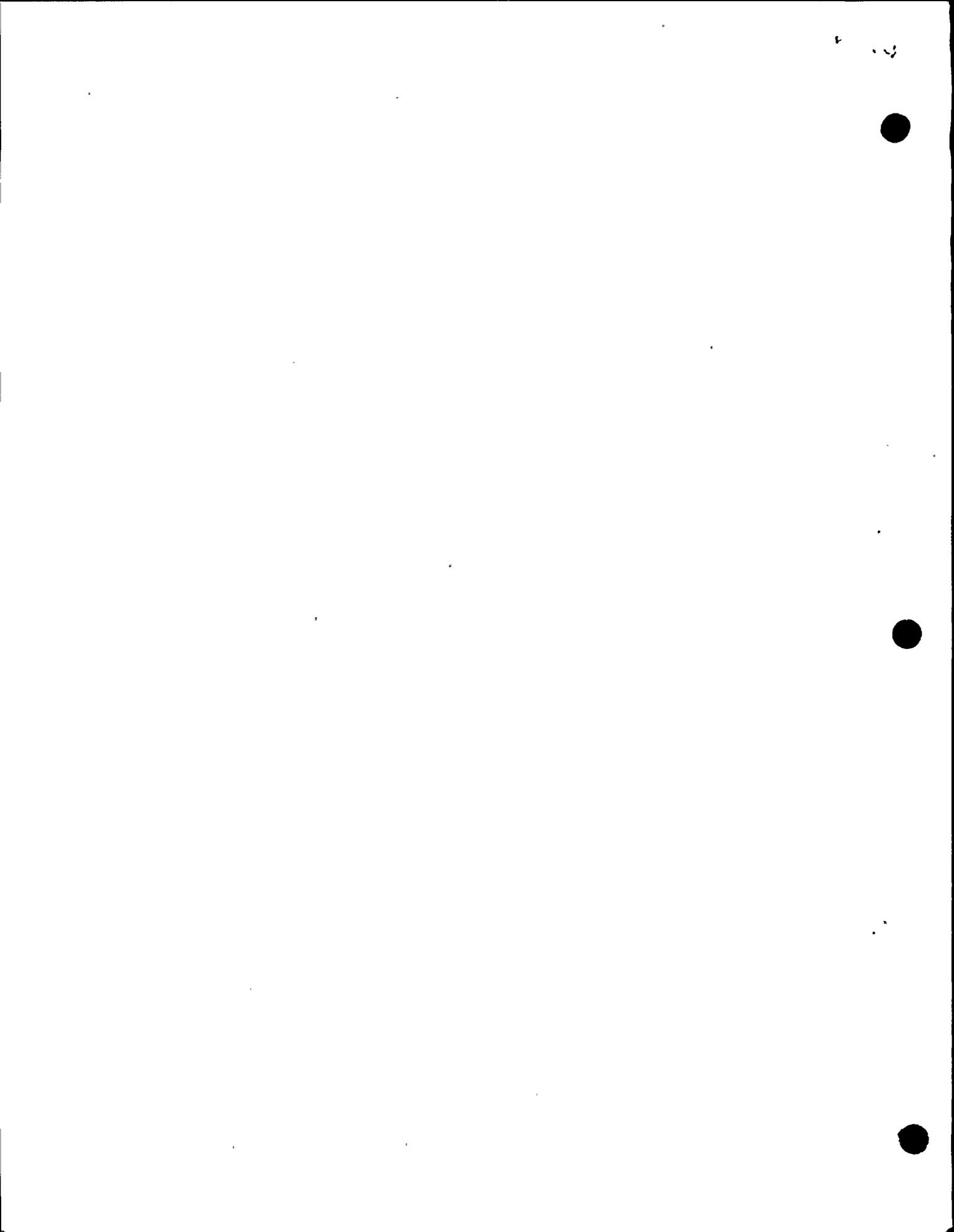
Your cooperation with us is appreciated.

Very truly yours,

James P. O'Reilly
Director

cc: Mr. P. A. Burt, General Superintendent

bcc: P. A. Morris, RO New York State
H. D. Thornburg, RO PDR
R. H. Engelken, RO Local PDR
A. Giambusso, L NSIC
J. G. Keppler, RO DTIE
RO Files
~~DR~~ Central Files



NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

300 ERIE BOULEVARD WEST
SYRACUSE, N.Y. 13202

August 3, 1972

United States Atomic Energy Commission
Directorate of Regulatory Operations - Region I
Attention: Mr. James P. O'Reilly, Director
970 Broad Street
Newark, New Jersey 07102

Gentlemen:

Re: Provisional Operating License: DPR-17
Docket No.: 50-220

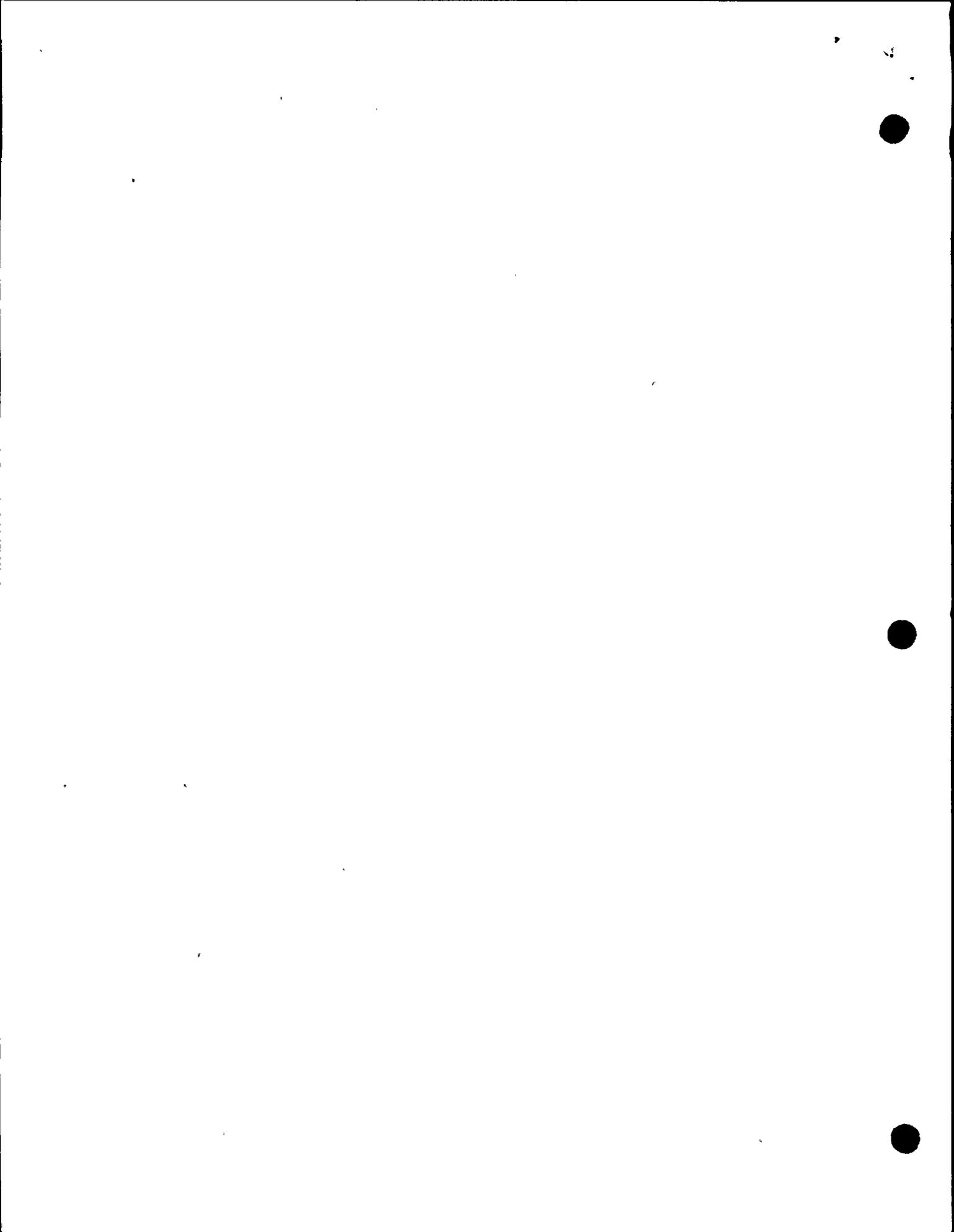
In your letter of July 17, 1972, you requested our response to certain items which you consider to be in noncompliance with AEC requirements. We will answer the specific items in the order and manner of the list which you provided with the letter.

Item 1 a

The Site Operations Review Committee (SORC) met on December 31, 1971 to investigate a turbine trip which occurred on that day. However, the results of their findings did not appear as a set of minutes until the meeting of that group on January 28, 1972.

Several meetings were held between December 31, 1971 and the regular meeting on January 28, 1972. All members of SORC are also members of the plant staff. This group holds meetings on the average of three times a week. Whenever items which are covered in the province of SORC are discussed at the staff meetings, notes are taken and these notes incorporated and made official at a monthly meeting of SORC. In this manner, the unwieldiness of having many pieces of paper is eliminated. However, in the future all meetings where items within the charter of SORC are discussed and acted upon by that committee, the meeting will be considered a meeting of SORC and minutes produced accordingly. The previous practice of combining the notes and minutes of the separate meetings into one at the end of the month will be discontinued. Therefore, July 1972 will be the last set of monthly minutes.

Although the minutes of the January 1972 meeting do not indicate that an analysis was made to determine why it was necessary to use the pressure relief valves to control reactor pressure for approximately



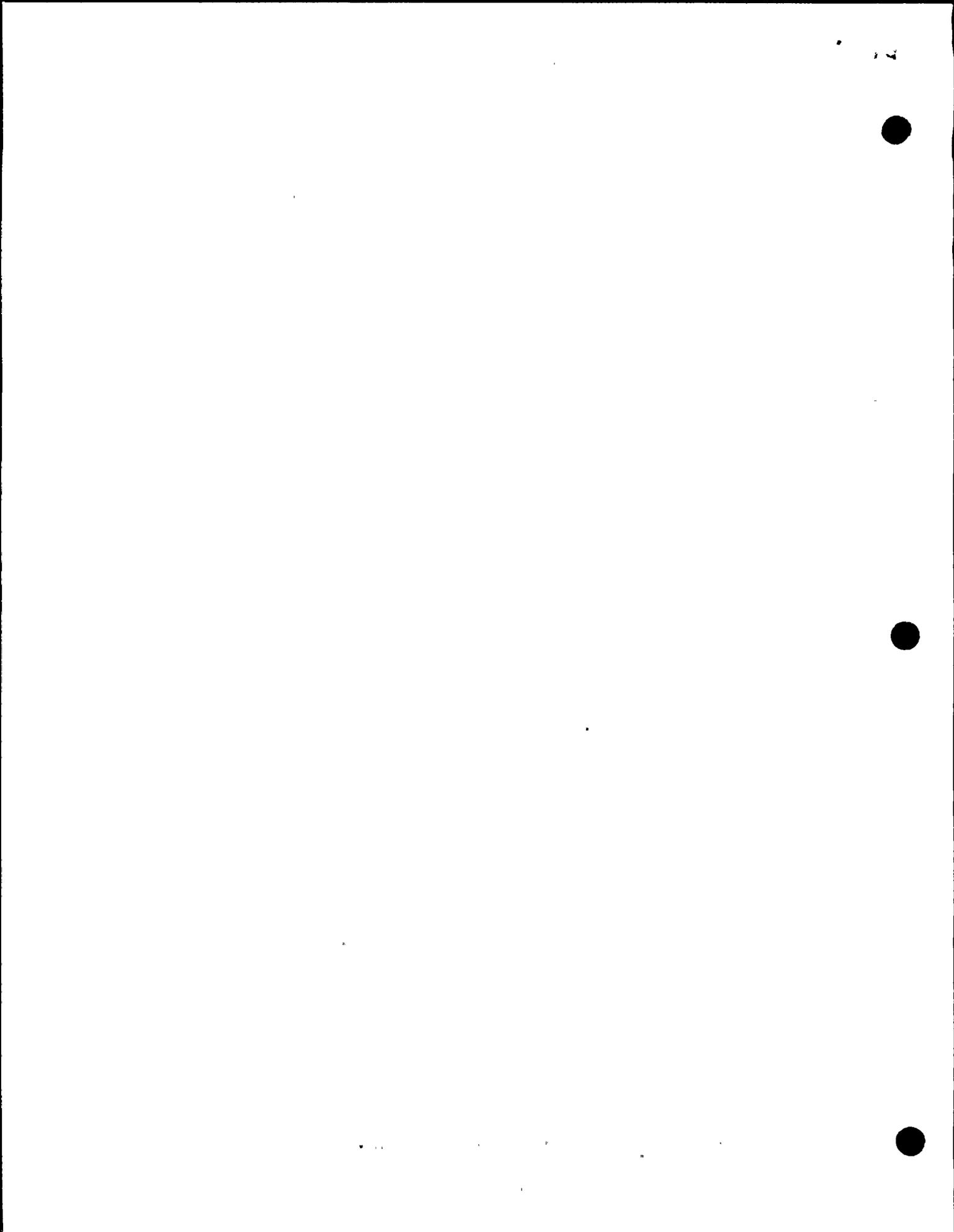
seventeen (17) minutes following the scram or that the isolation condensers were less effective than previously considered as a means of cooling the reactor during this period, an analysis was made by the committee covering several meetings during that period. The water level had increased to a point whereby the nozzles, taking steam from the reactor to the isolation condensers, were covered and the isolation condensers, in that situation, would operate on saturated water instead of saturated steam. Therefore, the heat transfer would be less effective. In order to hold the reactor pressure below the point where automatic initiation of the relief valves would take place, the operator initiated them manually.

The minutes of these meetings in the past have been of general nature, not dwelling on all details. The person who has been responsible for producing the minutes is also an active participant in the discussions as it is his responsibility to investigate such transients. It is difficult to keep notes on the meeting and to actively participate in the discussion. Therefore, we have appointed a competent engineer who will not be an active participant, to take these minutes in the future.

Also, all meetings will be recorded on tape so that all details of the conversation will be made available to the person writing the minutes. We expect improvement in the detail and frequency of these minutes in the future.

Item 1 b

The minutes of the SORC in the meeting that took place on February 28, 1972 to review a scram that took place on that same day, do not show the results of an analysis that was made to determine why the power supply to the #11 reactor protection system bus failed or why all of the feedwater controls were inoperable following the scram. This is a similar situation to that described in Item 1 a. In this case, however, the reactor was left out of service in as much as some valves inside of the drywell had to be repacked. During this period, the analysis was conducted and it was found that the MG set failed to transfer from AC to DC as the fuse in the DC control circuit was blown. The design calls for a 10 amp fuse and it was found that a 6 amp fuse had been installed in its place. The fuse stamping was very difficult to read and probably had been installed at the time of construction. The transfer was caused by operation of an underfrequency monitor which has a 70 millisecond time delay. Apparently, electrical noise had caused this device to operate. The entire control circuits were checked out and no difficulties found. The time delay of the underfrequency relay was changed from 70 milliseconds to 110 milliseconds making the device insensitive to electrical noise, thus preventing unnecessary transfers. The fuses in all the other MG sets were checked to insure proper size. All of the feedwater control was inoperable because it was fed from the same power supply bus. It has now been corrected so that all the circuits are not powered from the same MG set. This will provide manual flow control on at least one motor pump on loss of power.



All of this was reported in detail on the report of the scram and malfunction in a letter to Mr. Donald J. Skovholt on April 18, 1972. Again, this is the problem of asking competent people who are major participants in examining the problem to write the minutes. It too, will be corrected by the action described in Item 1 a above.

Item 2 a

Notification by telephone to Region I - Compliance was not made until January 3, 1972 following the scram on December 31, 1971. Although this was on a holiday weekend, some effort should have been made to notify the Compliance Inspector. This will be done in the future regardless of holiday periods or hours of the day or night. We understand that Compliance now has an answering service and feel that this will help expedite such notification.

The report was not submitted until January 20, 1972 in the interests of trying to get more meaningful information into the report. In the future, such reports will be made, even though preliminary, in the required time.

To help expedite the investigation of such incidents, the person having charge of this investigative type work has been provided with an assistant to help expedite the investigations.

Item 2 b

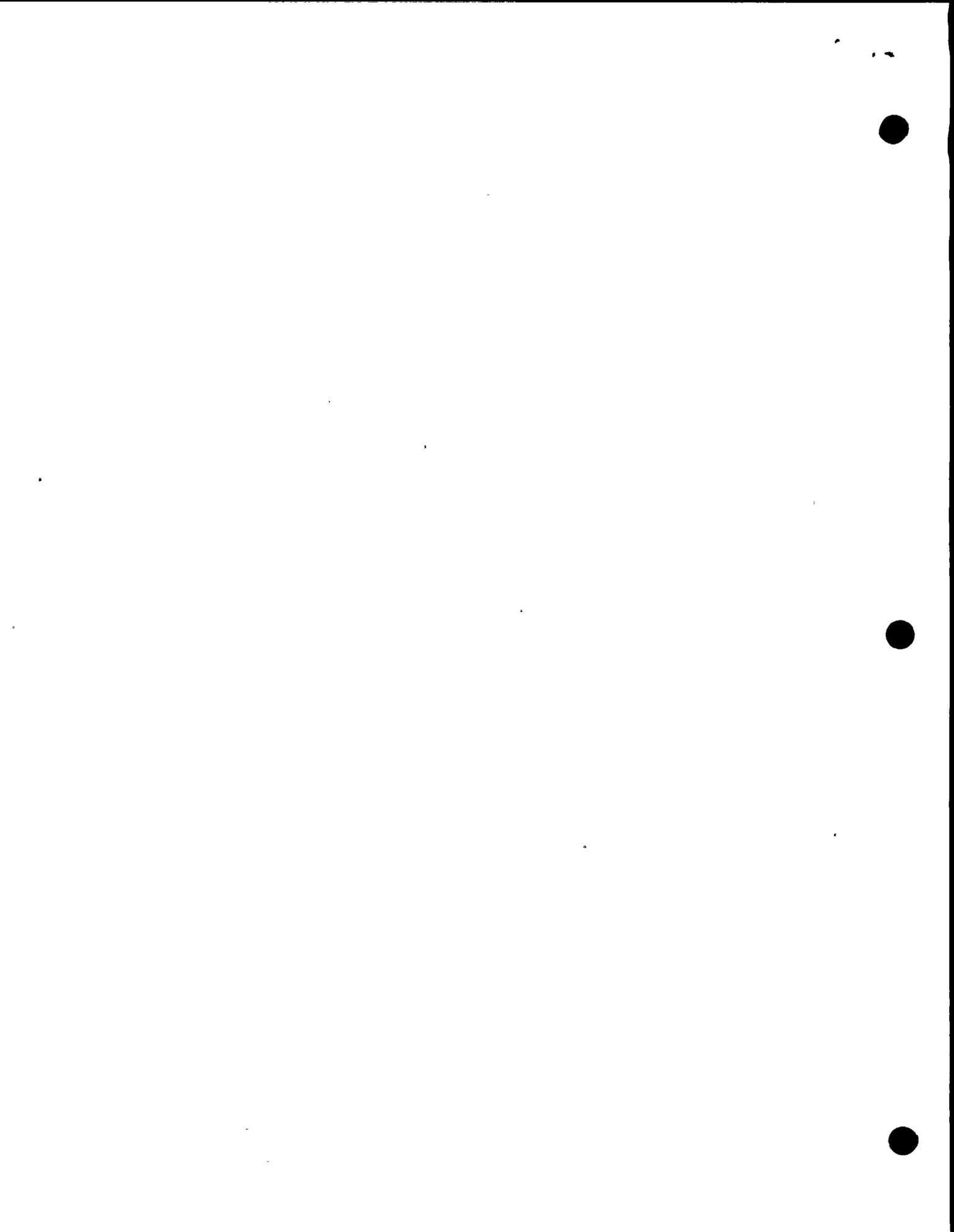
Compliance was not notified until March 9, 1972 of the failure of the power supply to #11 reactor protection bus and the written report was not submitted to DRL until April 18, 1972.

A competent engineer has been appointed to recognize when reports are to be made, to write reports after consultation with others and to submit them to the Commission in the required time period. Items mentioned in 2 b were investigated as stated previously. We feel that with this new alignment of manpower, there should not be any future problems in reporting on time or providing reports in the required interval.

Item 2 c

Technical Specification, Paragraph 3.2.9, specifies that four of six solenoid actuated pressure relief valves shall be operable when reactor pressure is greater than 110 psig. It is stated that on May 12, 1971, four valves were found to have set points greater than 12 psig lower than the specified set points.

In the bases of the Technical Specifications, it states that each valve can be as much as plus or minus 12 psig. In as much as the error would cause the valve to open at a lower pressure or sooner than the specified, this was not reported in as much as the valve opening at a lower pressure does not cause the valve to be inoperable. We now recognize that in the strict wording of the Technical Specifications, we should have reported it and will do so in the future.



Item 2 d

A solenoid actuated pressure relief valve was found to be inoperative as a result of a maintenance inspection. As stated, Region I was notified at the time it was found, May 4, 1972. A written report was not submitted until June 2, 1972. This was not reported as the reactor was shutdown during this entire period.

In the future, such written reports will be made regardless of whether the reactor is operating or not. The appointment of a person to watch over and write such reports will assist in our prompt reporting in the future.

Item 3

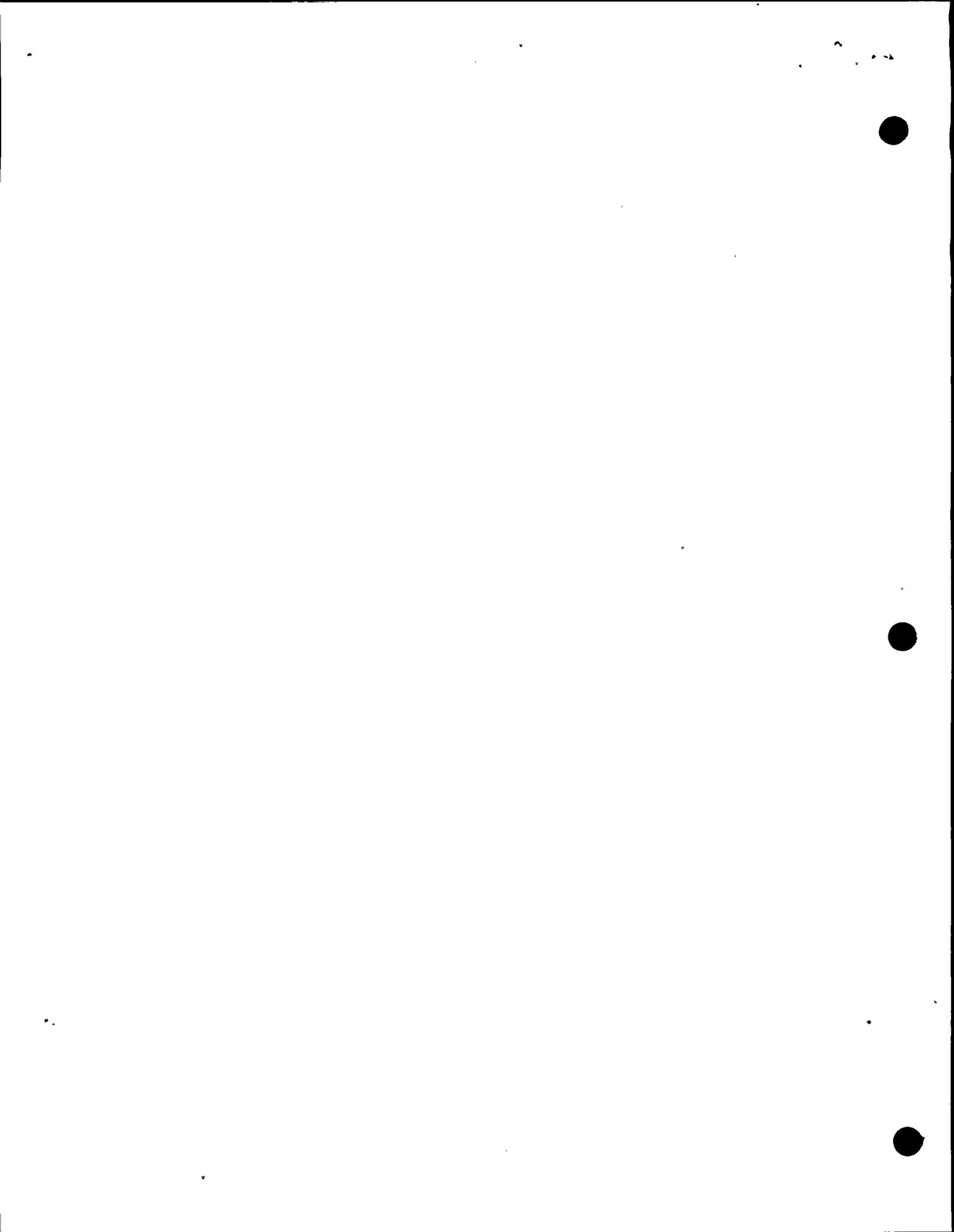
On February 17, 1972, DRL was notified by letter that a rearrangement of personnel was taking place at the Nine Mile Point Nuclear Station. This was occasioned by preparation to commence preliminary operation at the James A. FitzPatrick Nuclear Power Plant which Niagara Mohawk will operate for the Power Authority of the State of New York.

Apparently, mistakenly, we believed this letter to satisfy the requirement of notification and the Technical Specification change application could be initiated at sometime when application was being made for other changes to the Technical Specification.

We have been informed otherwise and have prepared the necessary papers requesting the change to the Technical Specification. They were approved in a meeting of the Safety Review and Audit Board on August 2, 1972. They should be in the hands of DRL by August 11, 1972.

All of the items which you have called to our attention appear to be more of the administrative rather than technical problems. Therefore, we have instituted the following changes to insure that proper reporting is done on time and that minutes of meetings brought out promptly after the action of the Site Operations Review Committee.

1. An engineer has been appointed to apprise key personnel as to when items should be reported and in what manner. He will be responsible for writing the report or letter after consultation with cognizant station personnel. This will relieve major administrative supervision from this task.
2. The secretary to the Site Operations Review Committee will be a non-participant. He will then be able to give full time to noting the details associated with decisions. He will be assisted by the use of a tape recorder so that he can review the discussion at the meeting and bring out all salient points.
3. Minutes of each meeting of SORC will be provided rather than combining all actions of that committee into one set of minutes once a month.



4. One additional engineer has been assigned to the investigative type work at the plant. This should speed up investigations and reports leading to the possibility of earlier reporting the the Commission.

These changes have been implemented at this date and we believe they should eliminate the items of your concern and prevent reoccurrence.

Very truly yours,



F. J. Schneider
Vice President - Operations

FJS:pw

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WASHINGTON, D.C.

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