

Reactor Facilities

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

MAY 11 1976

Niagara Mohawk Power Corporation
Attention: Mr. R. R. Schneider
Vice President
Electric Production
300 Erie Boulevard West
Syracuse, New York 13202

License No. DPR-63
Inspection No. 76-05
Docket No. 50-220

Gentlemen:

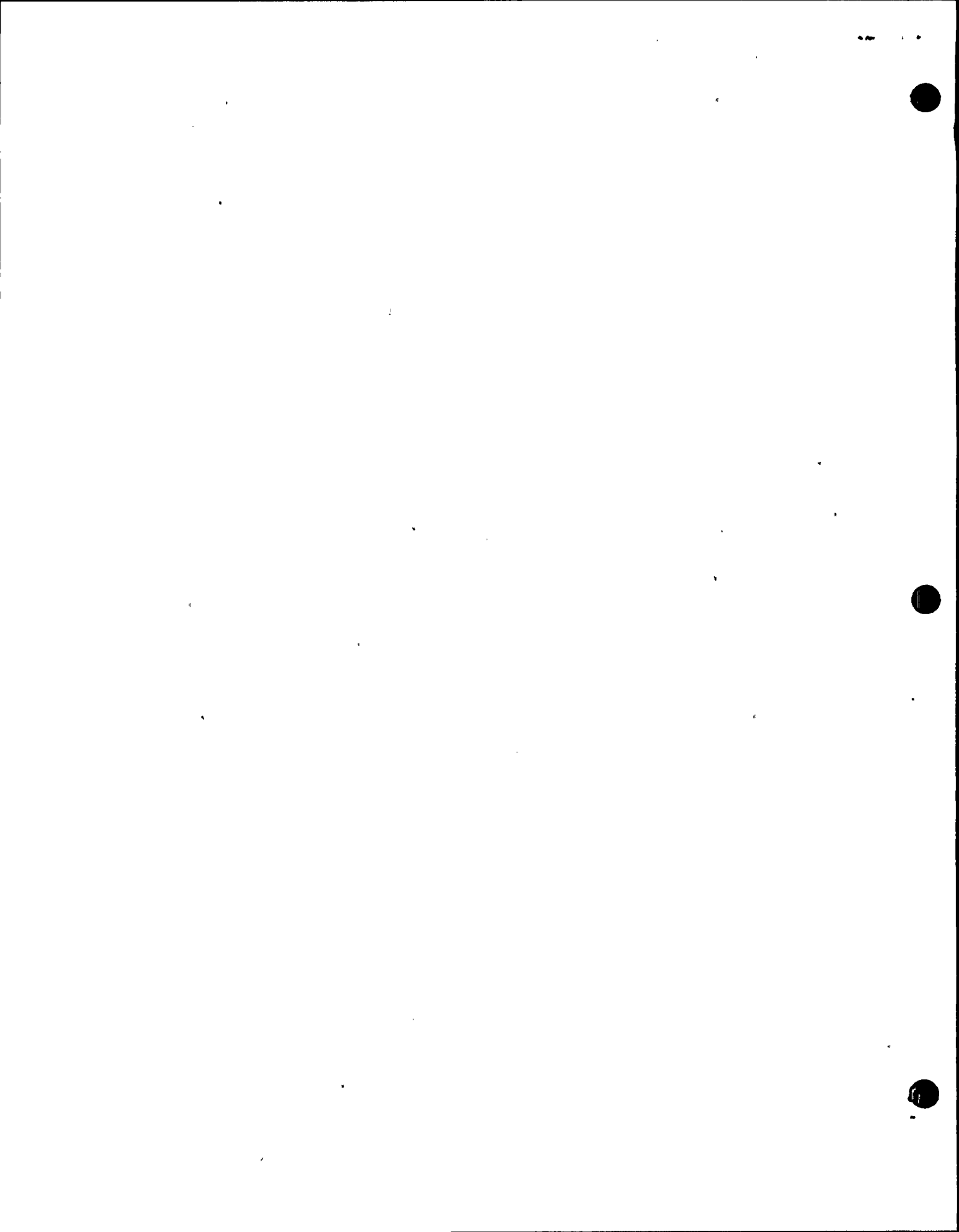
This refers to the inspection conducted by Mr. T. Stetka of this office on April 6-9, 1976 at Nine Mile Point Station, Oswego, New York of activities authorized by NRC License No. DPR-63 and to the discussions of our findings held by Mr. Stetka with Mr. T. Perkins of your staff at the conclusion of the inspection, and to a subsequent telephone discussion between Messrs. T. Stetka, D. Johnson, and T. Perkins and an additional subsequent telephone discussion between Mr. E. J. Brunner and Mr. T. Lempges on April 15, 1976.

Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Our inspector also verified the steps you have taken to correct the item of noncompliance brought to your attention in a letter dated January 7, 1976. We have no further questions regarding your action at this time.

Based on the results of this inspection, it appears that one of your activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. This item of noncompliance has been categorized into the levels as described in our correspondence to you dated December 31, 1974. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved.





In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch

Enclosure:

IE Inspection Report No. 50-220/76-05

cc: T. E. Lempges, General Superintendent, Nuclear Generation
T. J. Perkins, Station Superintendent
C. L. Stuart, Operations Supervisor
E. B. Thomas, Jr., Esquire
A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment (Without Report)

bcc:

IE Mail & Files (For Appropriate Distribution)

PDR

Local PDR

NSIC

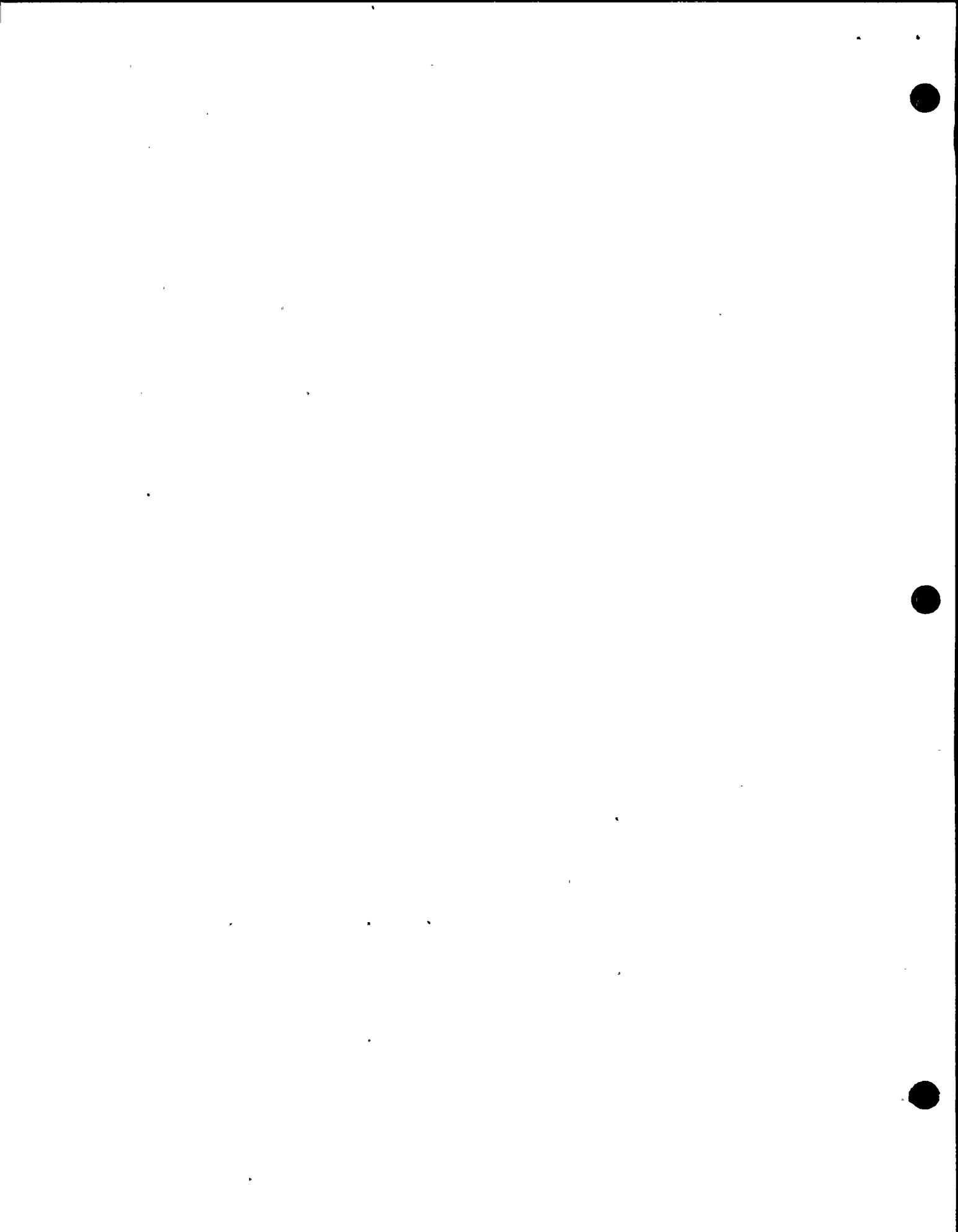
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REG:I Reading Room

Region Directors (II, III, IV) (Report Only)

State of New York

A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment



License No. DPR-63

APPENDIX A

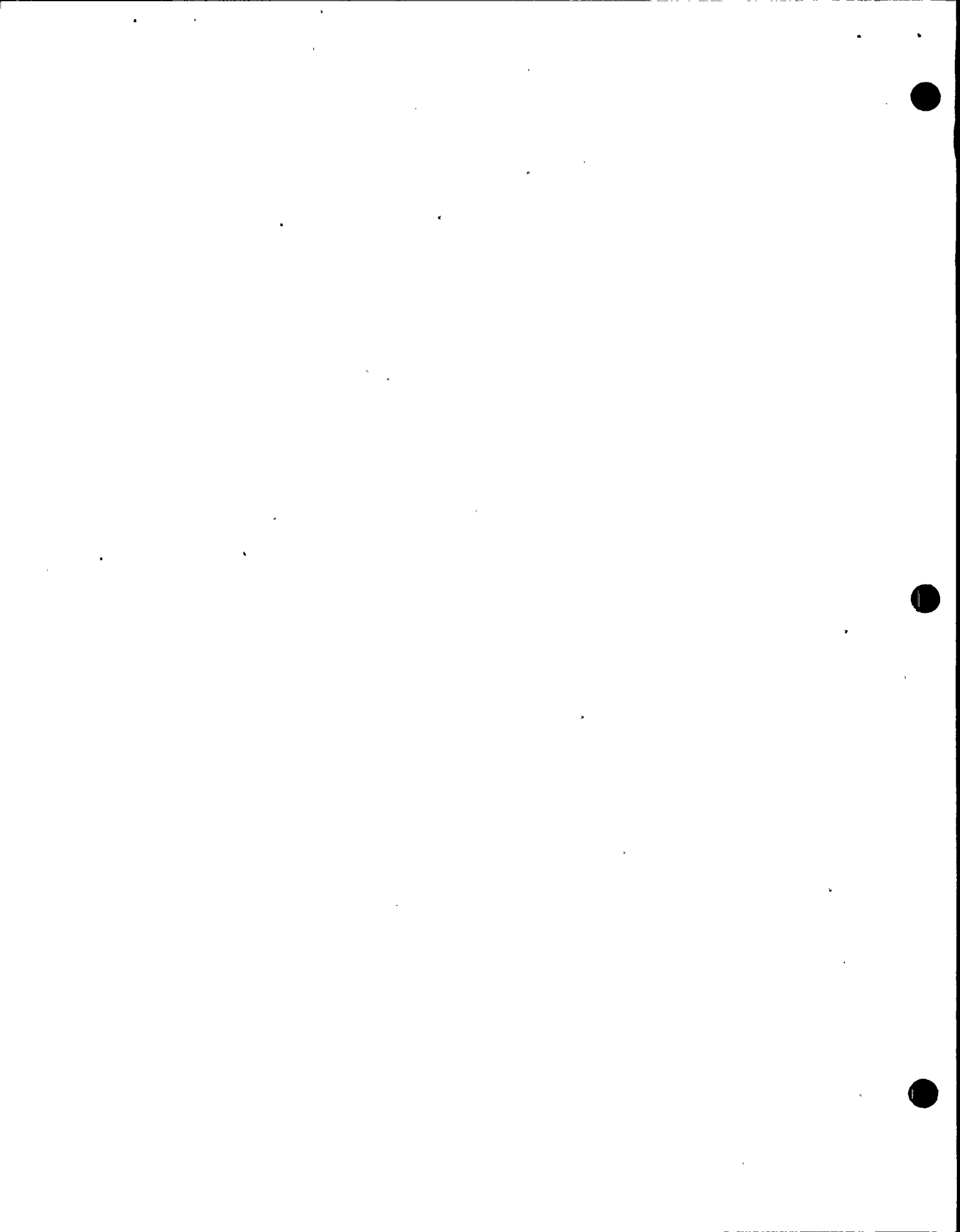
NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted on April 6-9, 1976, it appears that one of your activities was not conducted in full compliance with conditions of your NRC Facility License No. DPR-63 as indicated below:

10 CFR 50, Appendix B, Criterion V, states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances."

Contrary to the above, the licensee has not incorporated in surveillance Procedure N-PSP-1 Reactor Water Sampling and Analysis the requirements of the Technical Specifications Section 4.2.3 which addresses the taking of Reactor Coolant samples at a increased frequency upon the failure of the continuous conductivity monitor.

This is a deficiency.



NOTICE
AS OF MAY 12 1976
REGION 1 HAS NOT OBTAINED PROPRIETARY
CLEARANCE IN ACCORDANCE WITH 10 CFR 2700

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
REGION I

IE Inspection Report No: 50-220/76-05 Docket No: 50-220

Licensee: Niagara Mohawk Power Corporation License No: DPR-63
300 Erie Boulevard West Priority: _____
Syracuse, New York 13202 Category: C

Location: Nine Mile Point 1, Scriba, N.Y. Safeguards Group: _____

Type of Licensee: 1850 MWT, BWR (GE)

Type of Inspection: Routine, Unannounced

Dates of Inspection: April 6-9, 1976

Dates of Previous Inspection: March 29-31, 1976

Reporting Inspector: *T. Stetka*
T. Stetka, Reactor Inspector

4/30/76
DATE

Accompanying Inspectors: *D. Johnson*
D. Johnson, Reactor Inspector

5/1/76
DATE

DATE

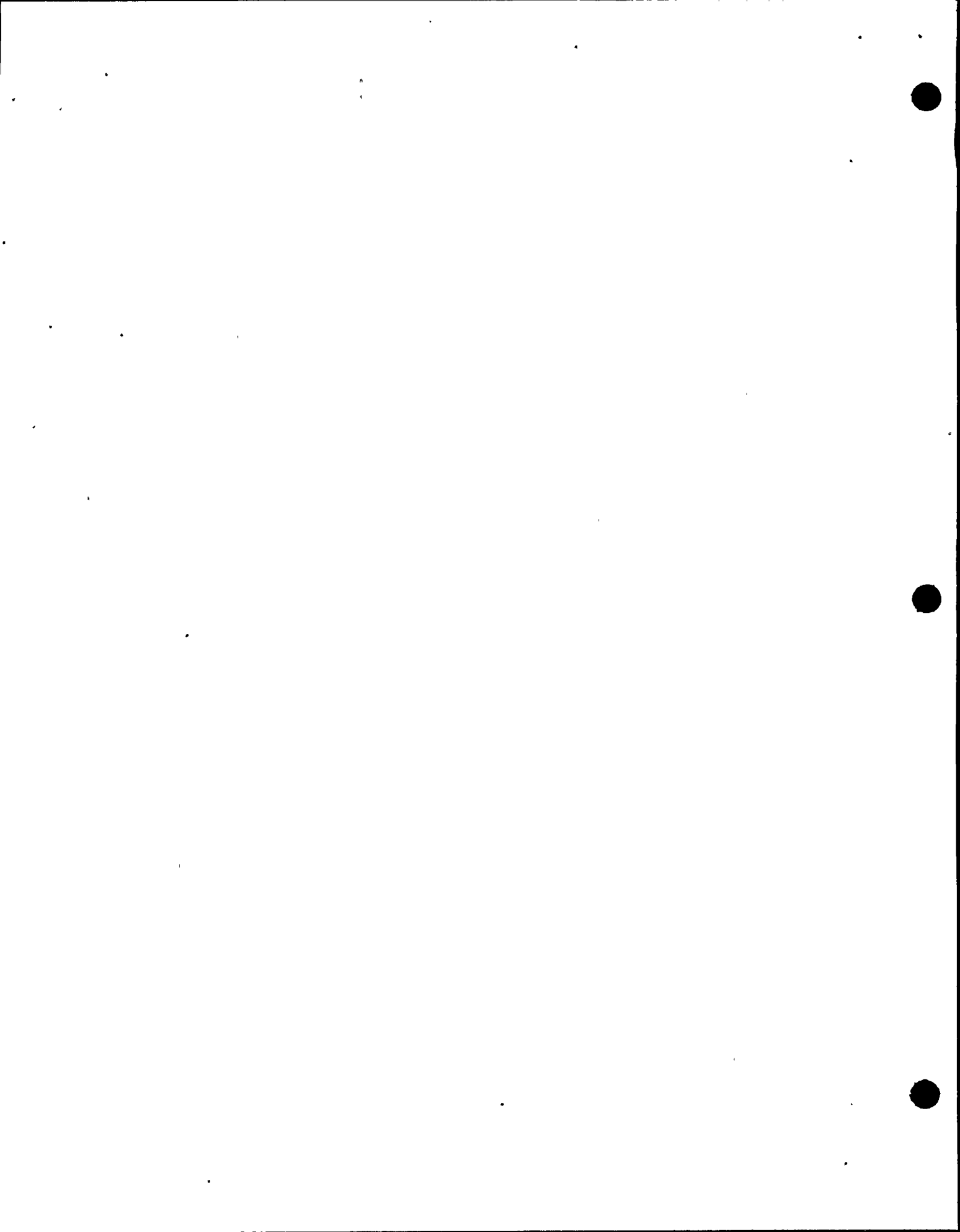
DATE

Other Accompanying Personnel: N/A

DATE

Reviewed By: *E. C. McCabe*
E. C. McCabe, Section Chief (Acting)
Nuclear Support Section No. 2
Reactor Operations and Nuclear Support Branch

5/4/76
DATE



Summary of Findings

Enforcement Action

A. Items of Noncompliance

Deficiency

Contrary to 10 CFR 50, Appendix B, Criterion V, requirements that documented procedures be prescribed to cover activities affecting quality, Technical Specification surveillance requirement 4.2.3 was not specified in the applicable procedure. (Detail 3)

Licensee Action on Previously Identified Enforcement Items

Item of Noncompliance; Inspection Report 50-220/75-29

The licensee's corrective actions with respect to the above referenced report were reviewed by the inspector and found complete. (Detail 4)

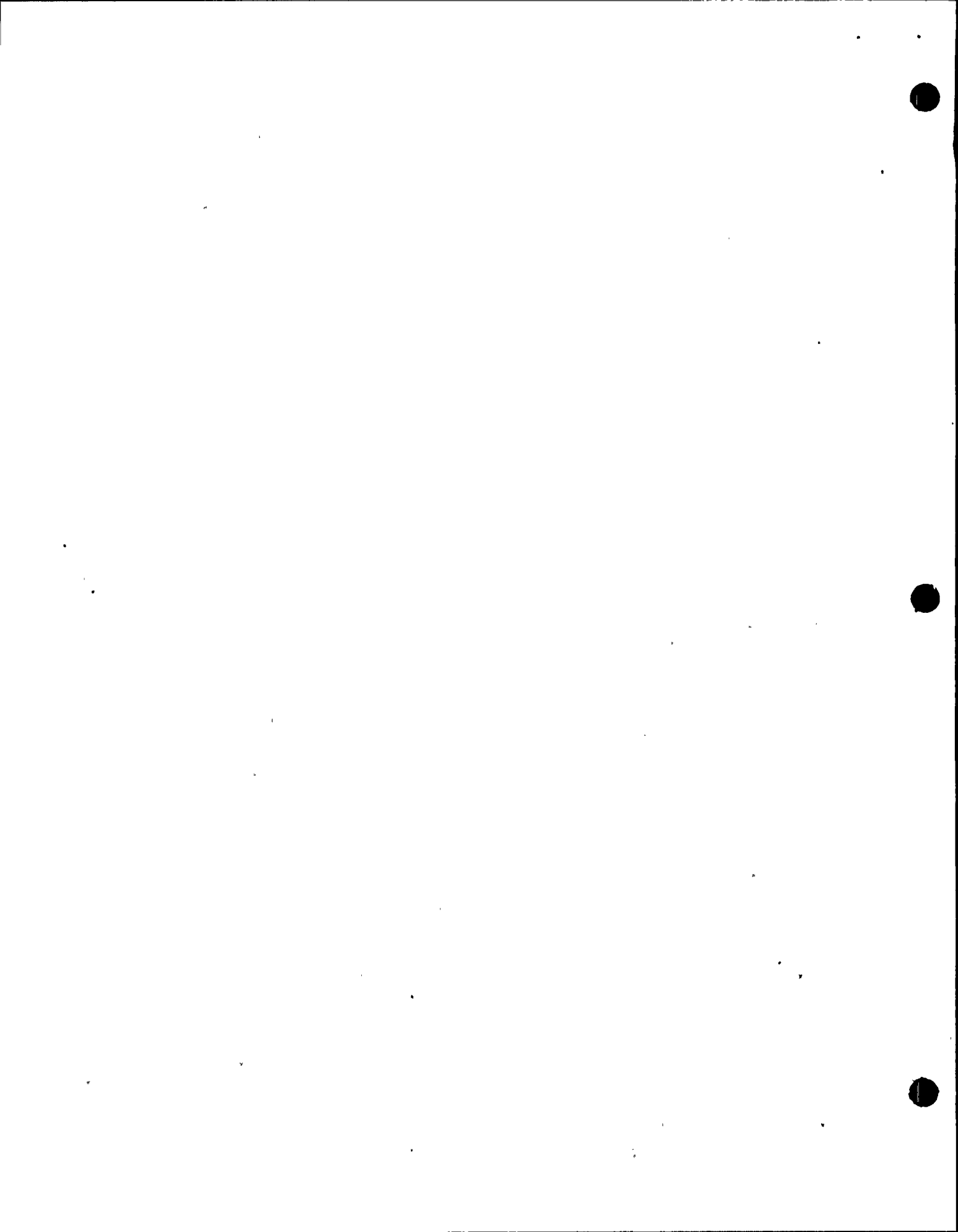
Other Significant Findings

A. Current Findings

1. Acceptable Areas

These are areas which were inspected on a sampling basis and findings did not involve an Item of Noncompliance, Deviation or an Unresolved Item.

- a. Administrative controls for management review and approval of facility procedures and procedure changes. (Detail 5)
- b. Temporary procedures and temporary changes associated with safety-related systems conformance with Technical Specification requirements. (Detail 6)
- c. Facility procedures changes to reflect Technical Specification revisions. (Detail 7)
- d. Overall format and content of facility procedures. (Detail 8)
- e. Maintenance activities on safety-related systems and components. (Detail 9 less 9c(1)(a))



2. Unresolved Items

These are items for which more information is required in order to determine whether the items are acceptable or are Items of Noncompliance.

- a. Apparatus Needing Attention (ANA) Forms and Requirements for Maintenance Procedures. (Detail 9.c(1)(a))

B. Status of Previously Unresolved Items

1. The following items were reviewed and are resolved.

- a. Procedure N1-ST-W11, Test Check List and Battery Specific Gravity review (Reference IE Report 50-220/75-29 paragraph 6b(2)). (Detail 10a)
- b. Completion Status of Facility Operating Procedures Upgrading Program (Reference IE Reports 50-220/75-07 paragraph 5 and 50-220/75-29 paragraph 7.a). (Detail 10b)
- c. Scope of Procedural Coverage, with the exception of item 2.b below. (Reference IE Reports 50-220/75-07 paragraph 6 and 50-220/75 paragraph 7c). (Detail 10c(1))

2. The following items were reviewed and remain unresolved.

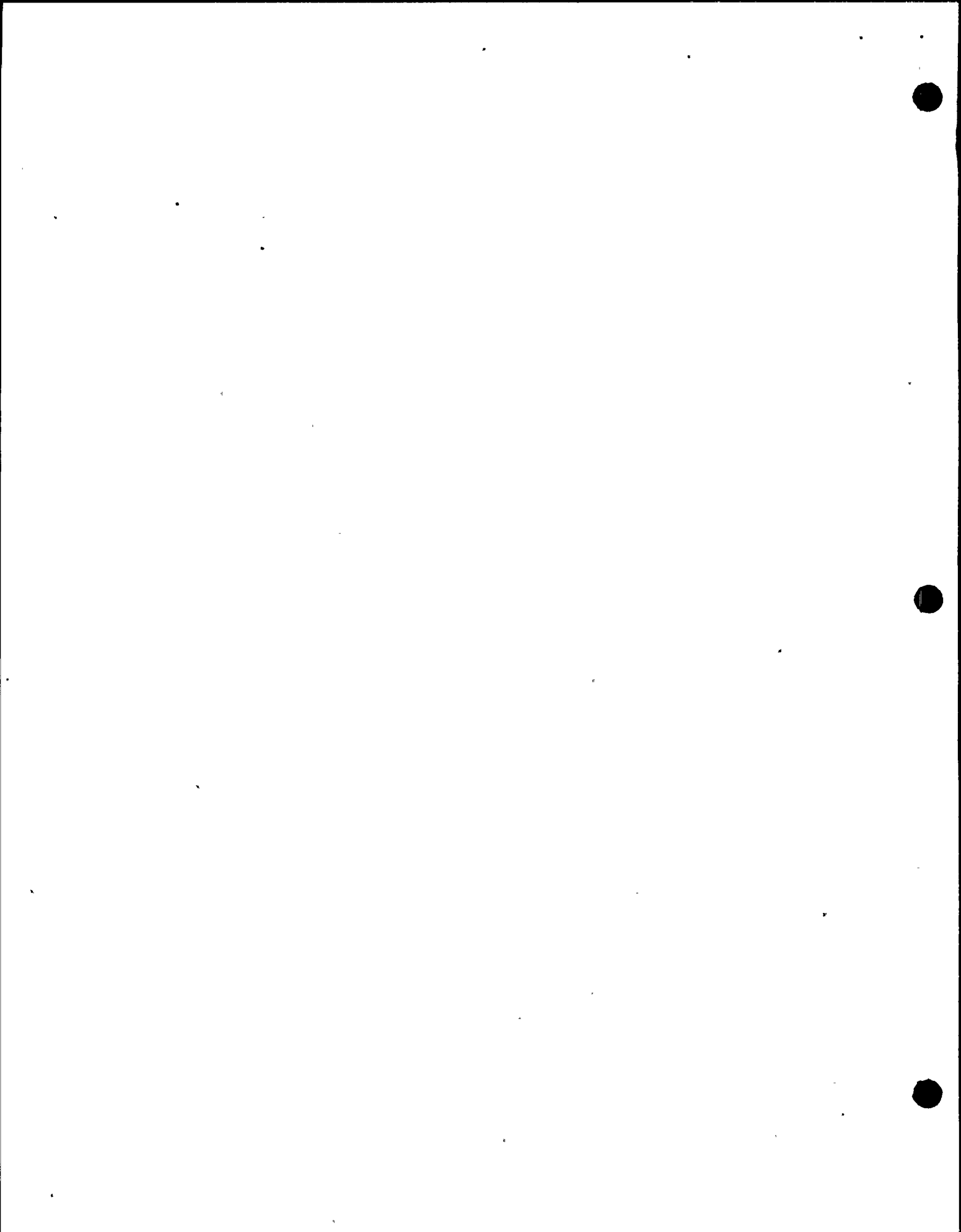
- a. Preventive Maintenance Program (Reference IE Reports 50-220/74-16, 50-220/75-07 paragraph 4, 50-220/75-29 paragraph 7.b) (Detail 10.d)
- b. Scope of Procedural Coverage - Requirements for Periodic Review of Procedures (Reference IE Reports 50-220/75-07 item 6.a(3) and 50-220/75-29 item 7.c(1)(c)). (Details 10.c(2))

Management Interview

A. An exit interview was held on site on April 9, 1976 to discuss the findings as detailed in this report.

B. Persons Present

Mr. R. Baker, Maintenance Supervisor
Mr. W. Bryant, QC Supervisor - Operations
Mr. M. Cosgrove, Site QA Engineer
Mr. J. Kerfieh, Assistant QC Supervisor
Mr. T. Lempges, General Superintendent, Nuclear Generation
Mr. J. Leonard, PASY Resident Manager
Mr. G. Leskiw, Assistant QC Supervisor
Mr. T. Perkins, Station Superintendent, Nine Mile Point
Mr. M. Silliman, Results Supervisor
Mr. R. Smith, Station Superintendent, J. A. FitzPatrick



Details

1. Persons Contacted

Nine Mile Point

Mr. R. Baker, Maintenance Supervisor
Mr. L. Bollin, I&C Supervisor
Mr. W. Bryant, QC Supervisor - Operations
Mr. K. Dahlberg, Assistant to General Superintendent
Mr. J. Duell, Chemistry Supervisor
Mr. E. Leach, Radiochemistry and Radiation Protection Supervisor
Mr. T. Lempges, General Superintendent, Nuclear Generation
Mr. G. Leskiw, Assistant QC Supervisor
Mr. C. Lilly, Shift Supervisor
Mr. W. Mosher, Site Office Supervisor
MR. D. Neild, Shift Operating Foreman
Mr. T. Perkins, Station Superintendent
Mr. J. Shea, Shift Supervisor
Mr. M. Silliman, Results Supervisor
Mr. M. Stancliffe, Nuclear Operator E
Mr. C. Stuart, Operations Supervisor
Mr. B. Taylor, Assistant I&C Supervisor

General Physics

Mr. B. Kline, Staff Specialist
Mr. R. Touzin, Operations Specialist

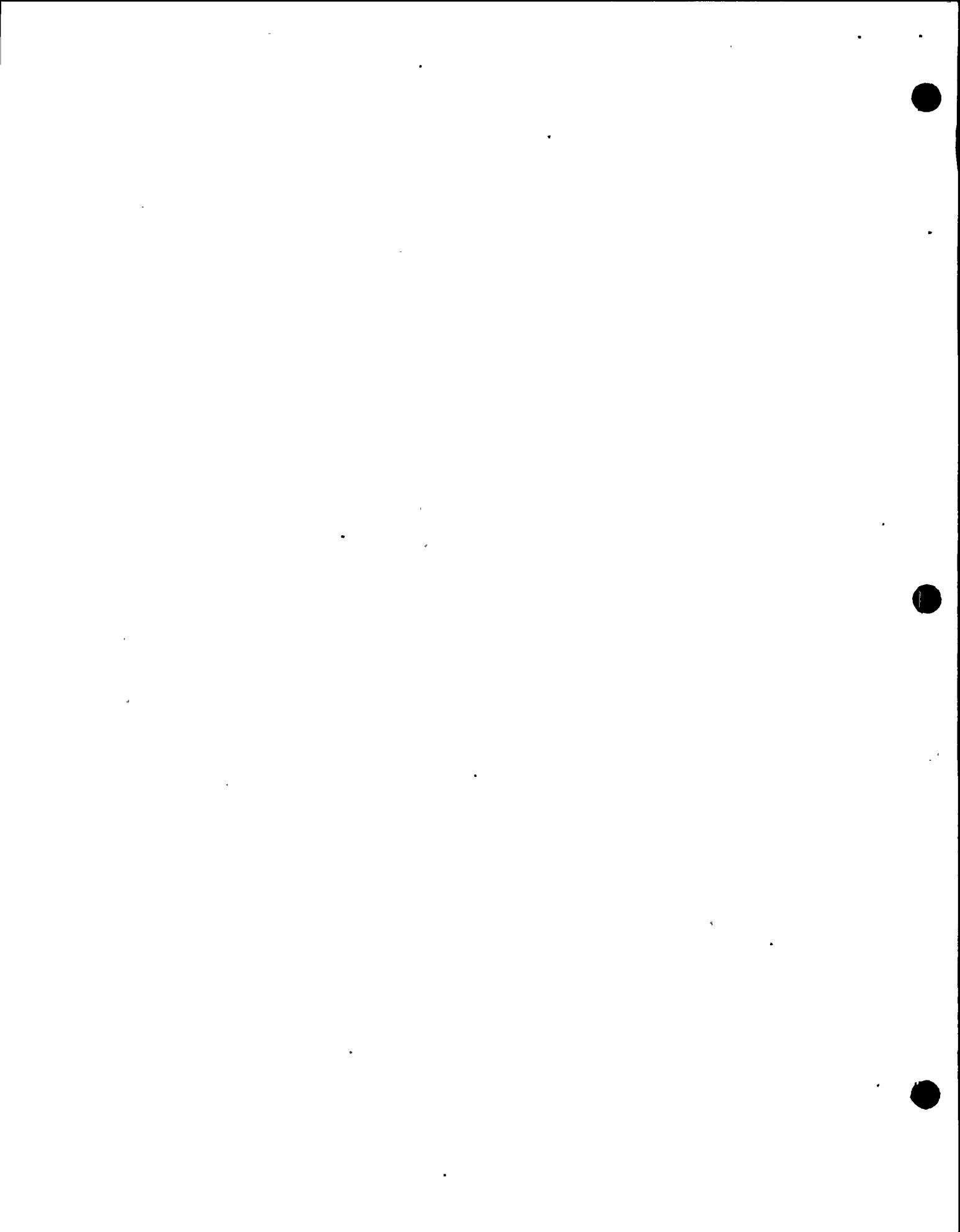
2. Purpose of Inspection

The inspector stated the purpose of the inspection was to:

- a. Verify completion of the licensee's corrective action for the Item of Noncompliance from IE Inspection Report 50-220/75-29.
- b. Review the status of previously Unresolved Items.
- c. Review the licensee's administration of safety-related procedures.
- d. Determine whether maintenance activities on safety-related systems and components were conducted in accordance with approved procedures, regulatory requirements, and the Technical Specifications.

3. Item of Noncompliance

During review of the status of previous unresolved items, the inspector noted that an unresolved item in IE Inspection Report 50-220/75-29, paragraph 6.b(1), concerning a revision to the Reactor Water Sampling and Analysis procedure N-PSP-1, had not been resolved. The



inspector questioned this since the licensee had committed that all revisions to the Operator Surveillance Test Procedures would be completely implemented by March 31, 1976 (letter to Mr. J. P. O'Reilly from Mr. R. R. Schneider dated December 26, 1975).

The revision to procedure N-PSP-1 involved inclusion of Technical Specification surveillance requirement 4.2.3 which, in addition to the normal sampling included in the procedure, requires an increased sampling frequency when the continuous conductivity monitor is inoperable. Absence of this requirement from procedure N-PSP-1 is contrary to the requirements of 10 CFR 50, Appendix B, Criterion V, which requires in part that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings or a type appropriate to the circumstances..."

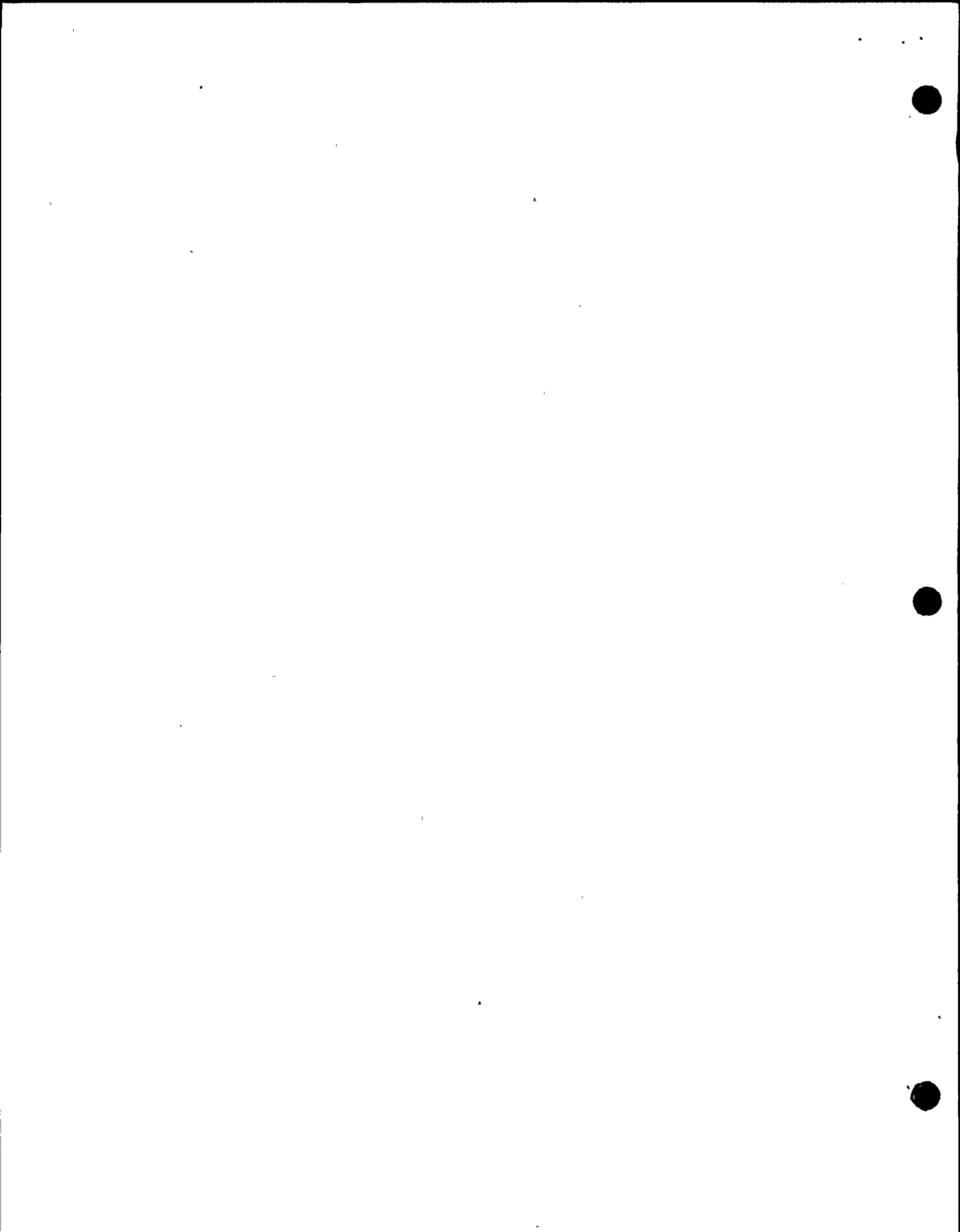
This is an Item of Noncompliance of the Deficiency level.

4. Previously Identified Item of Noncompliance

(Reference Inspection Report 50-220/75-29)

The inspector reviewed the licensee's corrective action regarding the Item of Noncompliance and noted the following.

- a. Procedure N1-ST-Q3, High Pressure Coolant Injection Pump Operability Test, was revised on 11/14/75, with approval review completed by the end of January, 1976. The complete procedure revision includes a new data sheet that provides adequate pump operability determination.
- b. Procedure N1-ST-M4, Emergency Diesel Generator Manual Start and 1 HR Rated Load Test, was revised 3/15/76, with approval review completed by March 31, 1976. The revised procedure contains an expanded data sheet which includes an initial and data blank to verify that the diesel has been run for at least 1 hour at the 2800 KW rated load specified in the procedure.
- c. Procedure N1-ST-D0, Daily Checks, was revised 9/25/75, with approval review completed by the end of December 1975. This complete procedure revision includes on the data sheet, all information necessary for calculation of the coolant leak rate.
- d. All procedures were verified to have SORC approval and management approval as specified by the administration procedures.



Licensee action on this Item of Noncompliance was found to be complete. The inspector had no further questions at this time.

5. Administrative Controls for Procedures

The inspector reviewed administrative controls for management review and approval of facility procedures and procedure changes related to nuclear safety to verify that the controls are in conformance with the requirements of Technical Specification 6.8. Instructions for the control of facility procedures are specified in the following Administrative Procedures.

- AP-1, Procedure for Administrative Controls.
- AP-3, Site Operations Review Committee Procedures.
- AP-5, Procedure for Control of Procedures.
- AP-7, Preparation, Review and Approval of Operating Procedures.
- AP-8, Procedure for Maintenance Procedures.
- AP-9, Procedure for Standing Orders.
- AP-11, Preparation, Review and Approval for Special Procedures.
- AP-15, Procedures for Special Orders and Instructions.

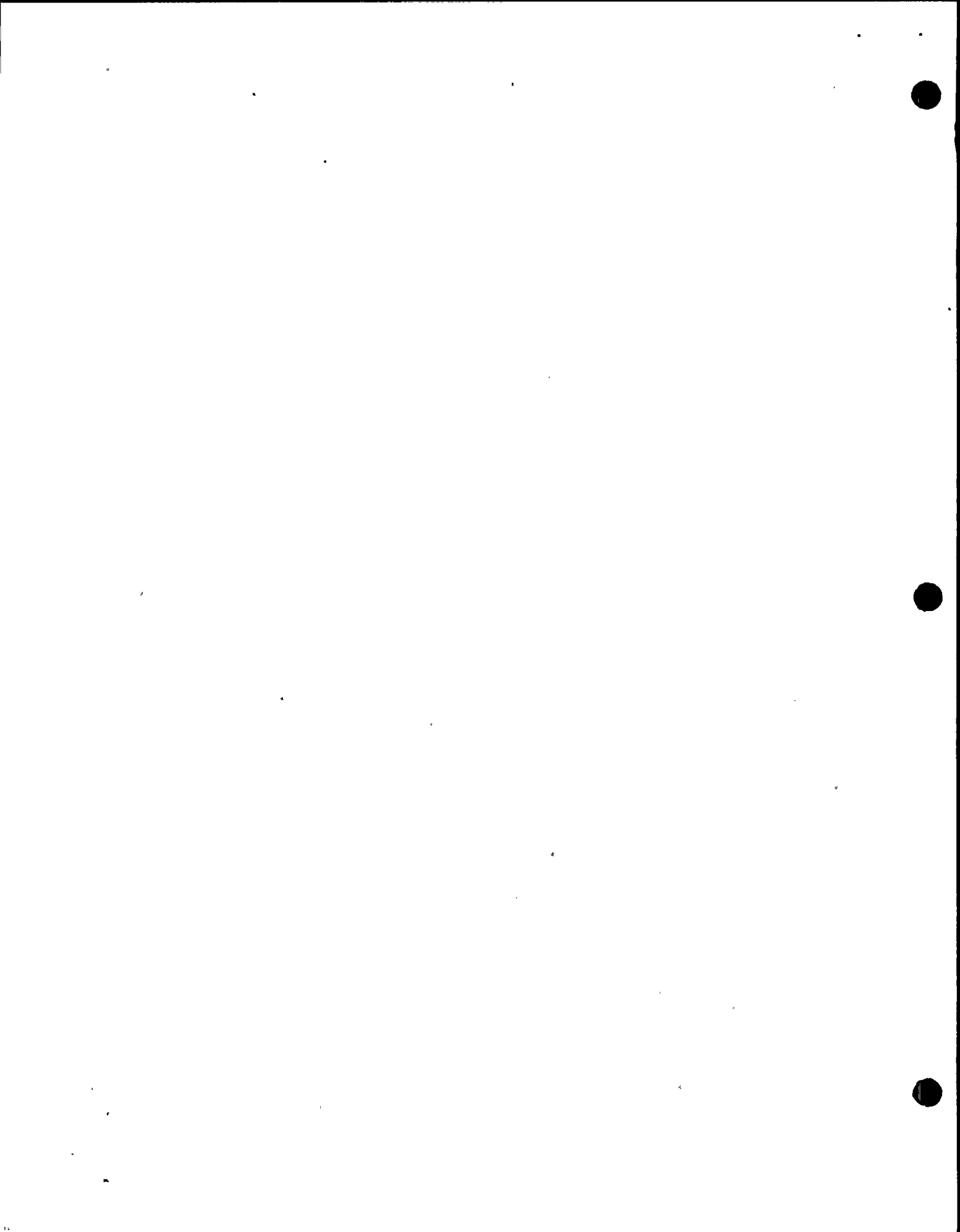
A review of a sampling of operating procedures (including the sections covering alarm responses), special procedures, and maintenance procedures was conducted to verify that the requirements of Technical Specifications Section 6.8, as implemented by the above administrative procedures, is being adhered to. The following procedures were reviewed.

a. Startup, Operation and Shutdown of Safety Related Systems and Components and Alarm Conditions

- OP-2, Core Spray System.
- OP-5, Control Rod Drive System.
- OP-14, Containment Spray System.
- OP-18, Service Water System.
- OP-38B, Intermediate Range Monitors.
- OP-45, Emergency Diesel Generators.
- OP-46, High Pressure Coolant Injection.
- OP-47B, 24 V DC Power System.

b. Special (Emergency) Procedures

- SP-7, DC Power Interruptions.
- SP-14, Loss of Service Water Cooling.
- SP-16, Reactor Scram.
- SP-21, Loss of Containment Integrity.



c. Maintenance Procedures

MP-6.6, Cleaning of CRD Filters
MP-13.6, Repair of Containment Spray Heat Exchangers.
IMP-40, SRM & IRM Detector Test and Replacement.
MP-7.10, Overhaul of Condensate Valves.

No inadequacies were noted in the administrative control of these procedures and associated procedure changes. The inspector had no further questions in this area.

6. Temporary Procedures and Changes

- a. The inspector reviewed facility procedures selected in Detail 5 a, b, and c to verify that any temporary changes made to these procedures did not conflict with Technical Specification requirements and limiting conditions. Based upon this review, no inadequacies were noted.
- b. During review of the licensee's records concerning temporary changes, the inspector noted that on 1/6/76 an apparent temporary change was made to step E.3(e)(1) of operating procedure OP-22, Resin Regeneration and Transfer, by a Station Shift Supervisor Instruction. This change was subsequently rescinded at a later date.

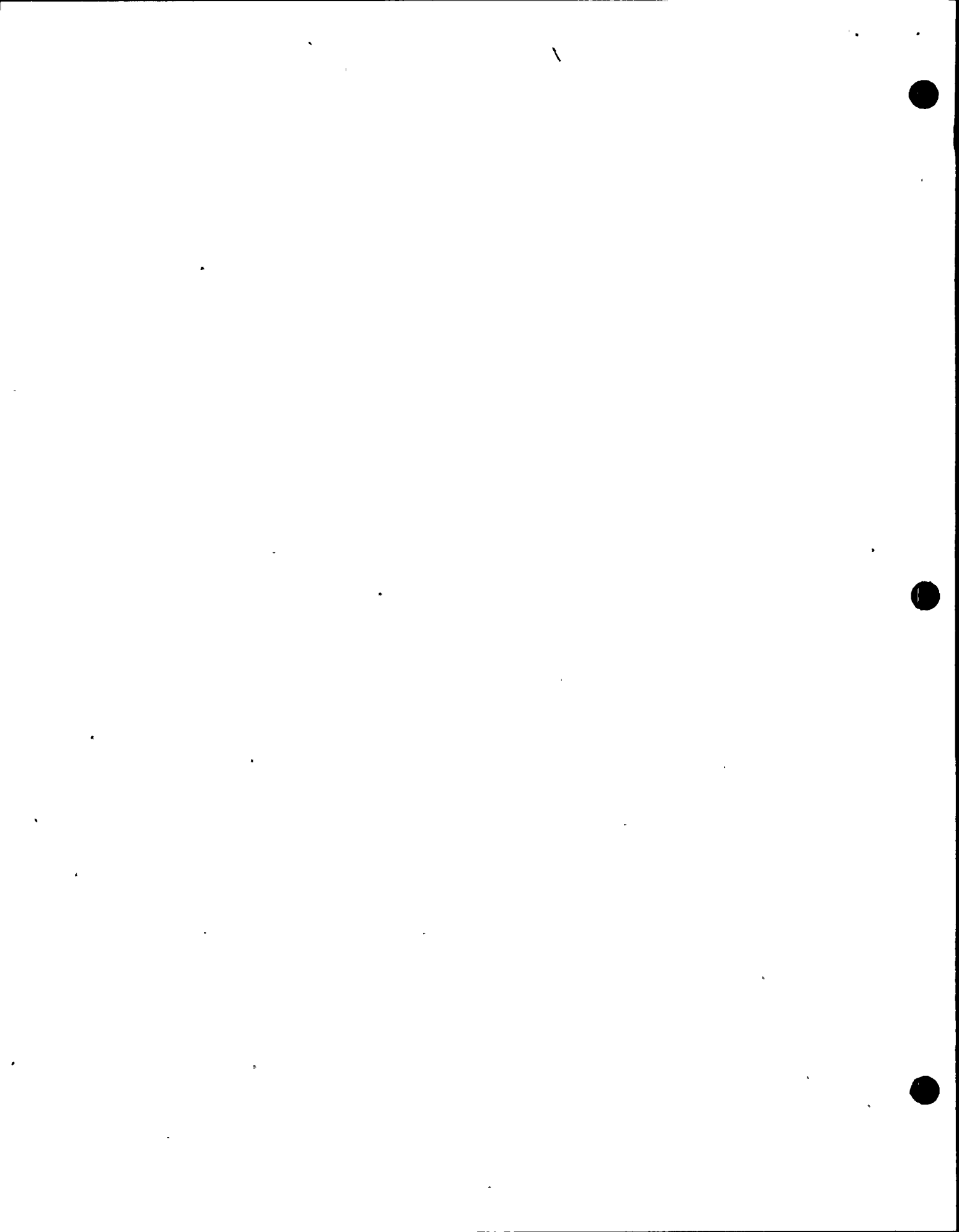
The inspector noted that, contrary to the requirements of AP-5, Procedure for Control of Procedures, the change was not reviewed by the SORC. However, the inspector also noted that the change was minor and did not have any safety significance or detract from the system integrity.

The inspector had no further questions in this area.

- c. The inspector also reviewed the following temporary procedures for conformance to Technical Specification requirements.

NMPSO-9, Drywell/Torus AP.
SSO-3, 4 KV Breakers (Racking Procedures).

The inspector had no further questions in this area.



7. Technical Specification Revisions Reflected in Facility Procedures

The inspector reviewed approved Technical Specification revisions for 1975 to verify that revisions were reflected in changes to applicable facility procedures. The inspector had no questions in this area.

8. In the audit of procedures selected in Detail 5a, b, and c the inspector checked the format and content of the facility procedures against the requirements of ANSI 18.7, 1972. The inspector had no questions in this area.

9. Significant Maintenance Activities

a. The inspector reviewed the following maintenance activities performed during the period from January 1, 1975 through December 31, 1975.

(1) Liquid Poison System

Removal of flow indicating device (paddle switch) replaced by fabrication of a spool piece, ANA-270692, N1-75-1.

(2) Ventilation System

Replaced exhaust fan in turbine building ventilation system, burned out motor, ANA-270926, N1-75-13

(3) Main Generator

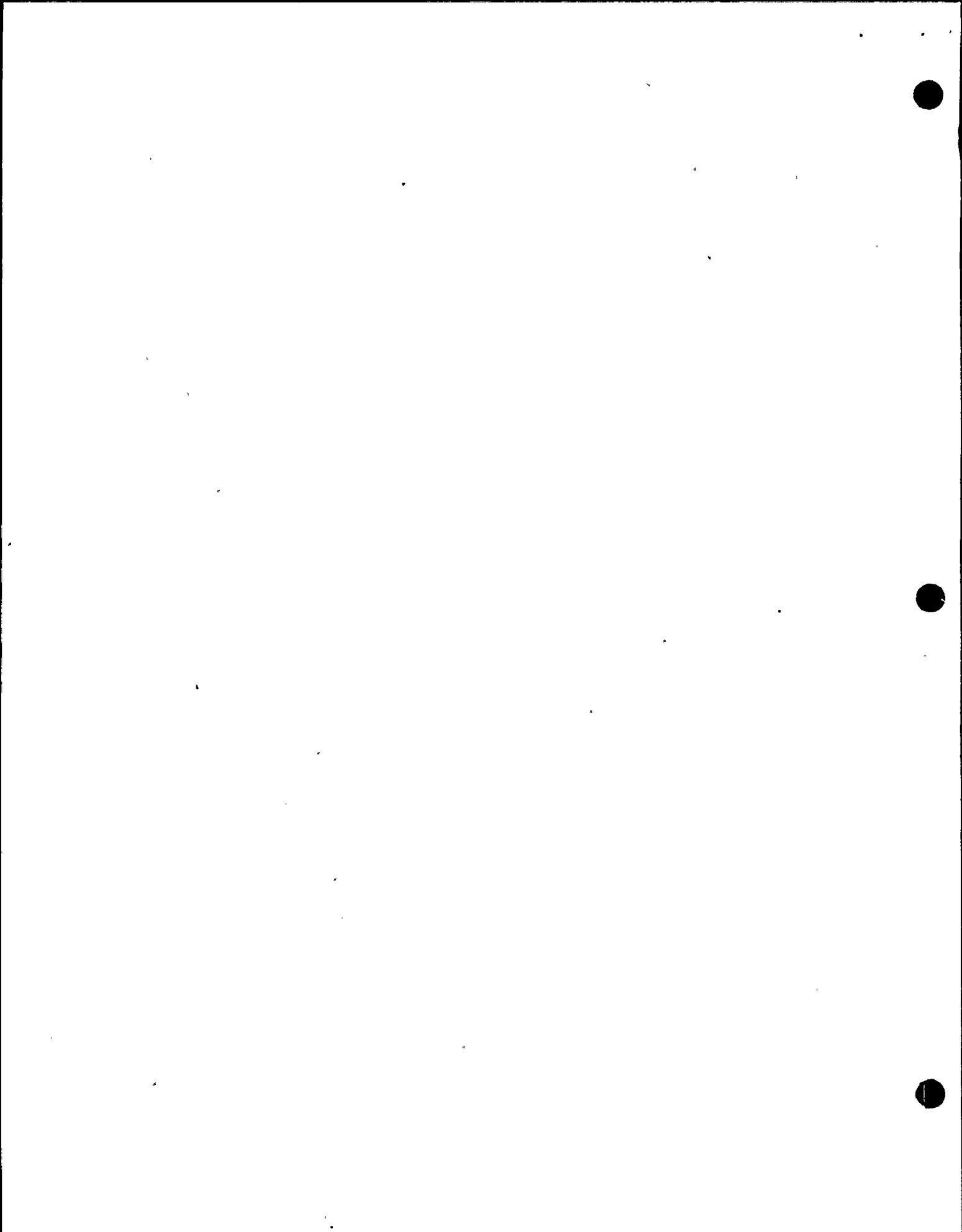
Changed generator overvoltage protection circuits for increased generator trip reliability. ANA-278314, N1-75.39

(4) Reactor Recirculation System

Repacked all (5) recirculation discharge bypass valves due to excessive unidentified drywell leakage, ANA-240656, 4/12/75.

(5) Control Rod Drive System

Replaced valve internals on both control rod drive flow control valves, due to decreased ability to control flow to the reactor vessel, ANA-270504, 9/17/75.



(6) Emergency Cooling System

Changed control leads on #11 AC motor operated steam isolation valve, bad set of contacts on control switch resulting in failure of valve to open on test signals, ANA-270922, 11/2/75.

(7) Emergency Diesel Generator

Replaced #103 diesel generator cooling water heat exchanger due to corrosion resulting in cooling water leakage, ANA-278364, 11/10/75.

(8) Containment Spray System

Plugged tubes in #112, #121 and #122 heat exchangers due to tube leakage, ANA 278377 and 278378, 11/26/75.

(9) Main Turbine

Replaced electronic pressure regulator valve due to a scored transmitter snubber valve, 2/28/75.

(10) Emergency Ventilation System

Replaced solenoid valve internals on emergency ventilation blocking valve due to valve inoperability, ANA-240808, 4/1/75.

(11) Main Steam System

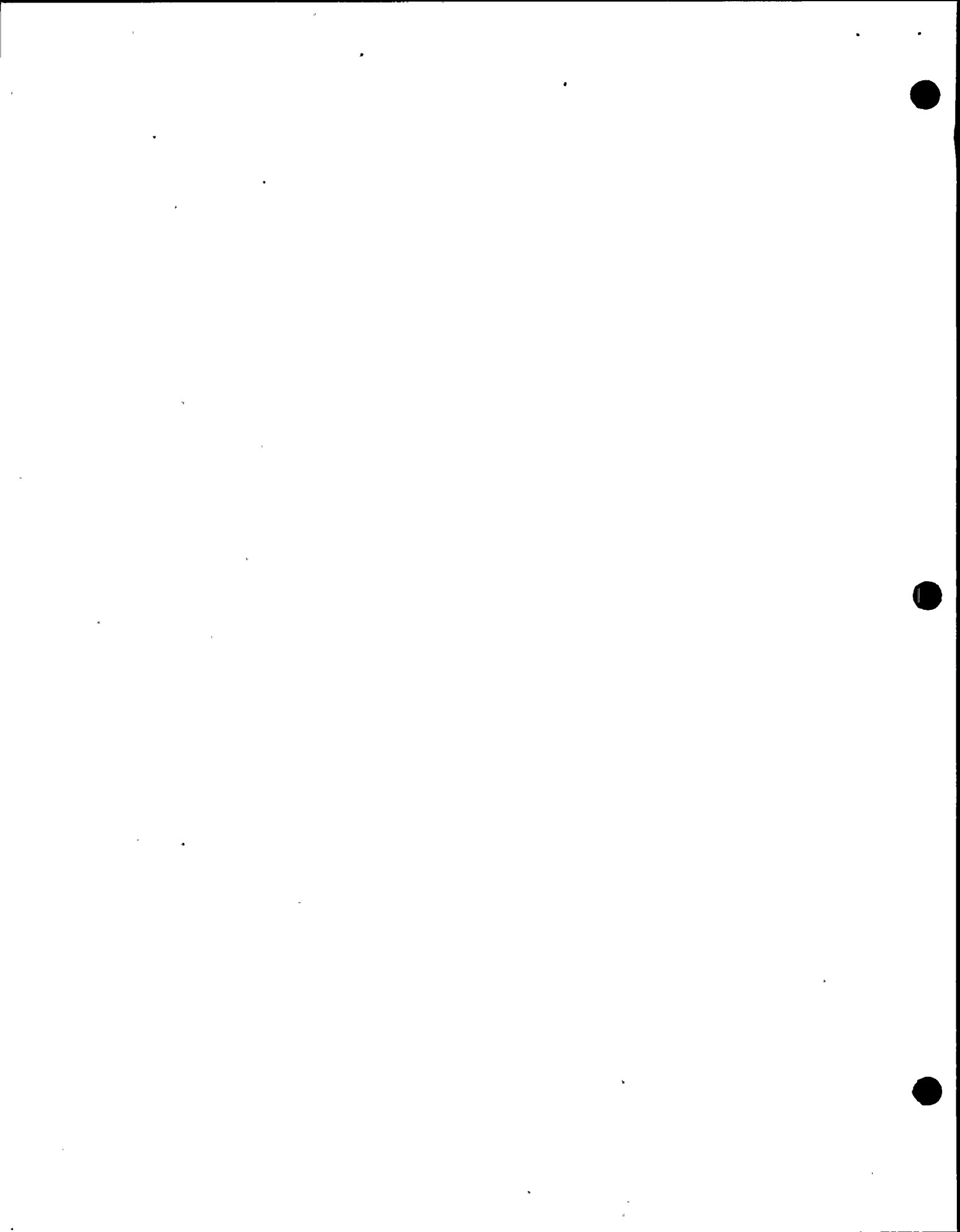
Overhauled #121 electromatic relief and pilot valve due to valve seat leakage, ANA-270683, 10/8/75.

(12) High Pressure Feedwater System

Replaced feedwater recirculation valve to condenser due to worn internals resulting in a decreased ability to control bypass flow during startups and continuous leakage to condenser during power operation, ANA-270700, 11/14/75.

(13) Control Rod Drive System

Replaced (5) control rod drive units due to reduced scram times and excessive stall leakage rates requiring higher than normal drive water pressure for movement, ANA-270684, 10/25/75.



(14) Low Pressure Feedwater System

Plugged tubes in #123 feedwater heater due to tube leaks, ANA-278489, 11/8/75.

(15) Reactor Protection System

Replaced turbine trip relay 12K30 due to relay coil burn up, 4/14/75.

(16) Reactor Recirculation System

Replaced seal on #13 reactor recirculation pump due to a mechanical seal failure, 10/22/75.

b. The inspector reviewed the following Administrative Procedures.

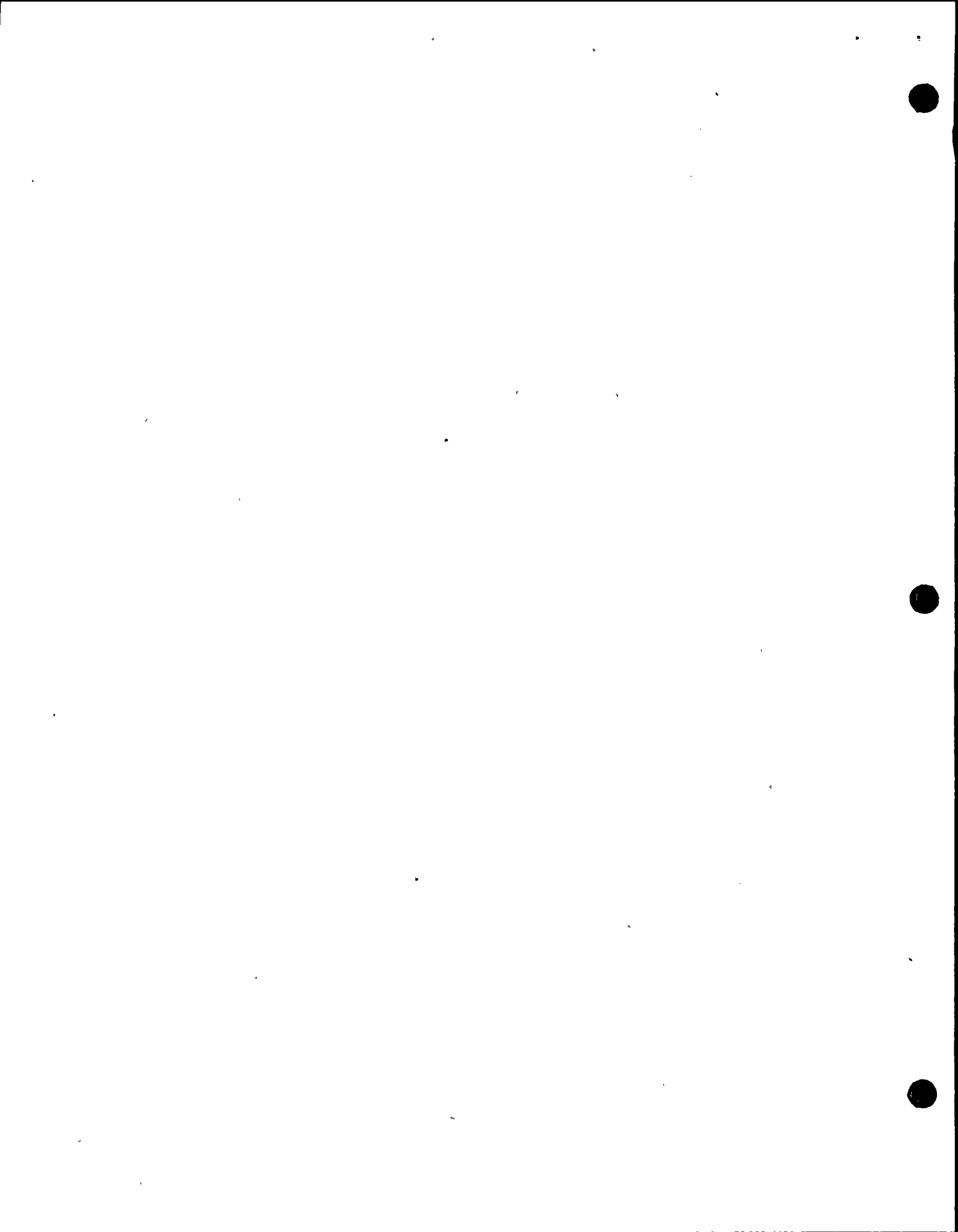
- (1) AP-1, Procedure for Administrative Controls.
- (2) AP-5, Procedure for Control of Procedures.
- (3) AP-8, Procedure for Maintenance Procedures.
- (4) AP-20, Procedure for Station/Plant Modification.
- (5) AP-27, Procedure for Control of Station Repair and Maintenance.

c. The inspector examined the Apparatus Needing Attention Forms (ANAs) for each maintenance activity identified above.

(1) The following findings resulted from review of the documentation and discussions held with the licensee.

(a) ANA's are not being prepared in accordance with requirements of Administrative Procedure AP-27 "Procedure for Control of Station Repair and Maintenance". ANA's do not contain sufficient documentation to furnish evidence that maintenance activities of safety-related systems and components are in full compliance with regulatory requirements. Examples of but not limited to are as follows:

- (1) AP-27 item 7.1.5 requires that the supervisor approving the ANA for issuance shall classify the component or system by marking "NRC Safety Related Class I or Class II or Class III." Contrary to the above, 3 of the 16 ANA's reviewed on a sampling basis had no such classification.



- (2) AP-27 item 7.4.2 and 7.4.3 requires that if the job is already the subject of an approved maintenance procedure list the number of the procedure.

If there is no approved maintenance procedure for the job a procedure must be developed and approved in accordance with Administrative Procedure AP-8, "Procedure for Maintenance Procedures."

AP-8 item 3.0 states that written maintenance procedures are required prior to maintenance or modification, of all nuclear safety-related systems and components at the Nine Mile Point-James A. FitzPatrick site, provided such maintenance or modification will affect the safety-related function of such systems and components.

Contrary to the above, when procedures were used in the performance of safety-related maintenance procedure numbers were not always annotated on the ANA forms.

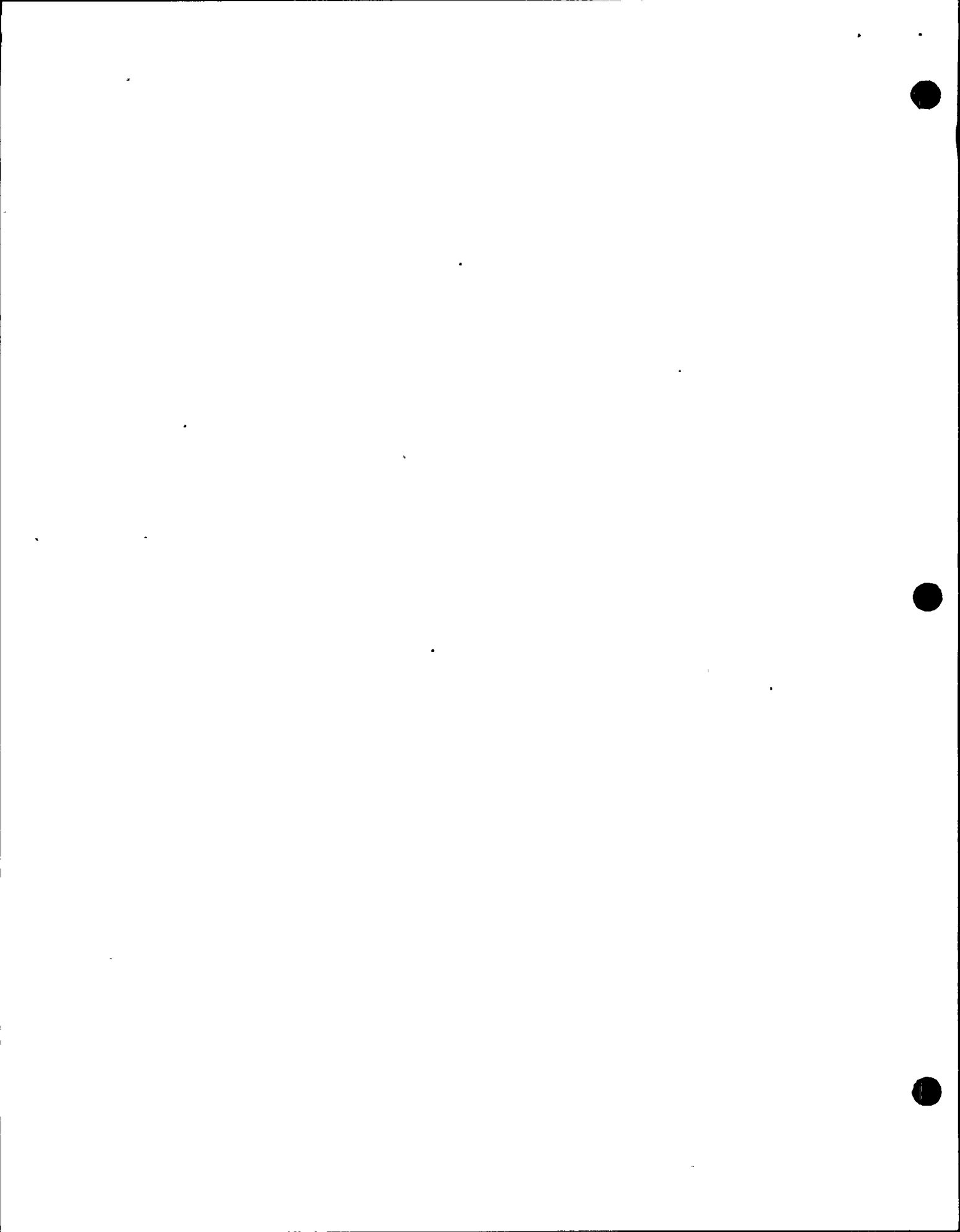
Procedures were not written for maintenance activities for items a.(1), a.(4) and a.(10) above, these activities affected the functioning of the system.

- (3) AP-27 item 7.6.2 requires that the person receiving an ANA for action include with the ANA copies of welding qualification certificates and nondestructive examinations and tests.

Contrary to the above applicable ANA's examined did not reference or contain the above supporting documentation.

- (4) AP-27 item 7.6.3 requires that copies of material issued and completed purchase orders comprising an inventory of all material used shall be attached to the ANA.

Contrary to the above, no reference was made to purchase orders, and replacement material was not documented on 5 ANA's reviewed.



- (5) AP-27 item 7.6.4 requires that a notation be made on each ANA of any RWP or mark up required.

Contrary to the above, not all ANA's reviewed contained the above references to RWP's and system mark ups to insure required administrative approvals were obtained prior to initiating the work and that prerequisites and Technical Specification requirements were met.

- (6) AP-27 item 7.6.5 requires that in-progress checkoff lists and the results of any functional or return to service tests shall also be included on the ANA.

Contrary to the above, only 4 of 16 ANA's examined included any documentation of functional or return to service tests.

A majority of the above items were previously identified by a recent internal Quality Control audit. As a result of this audit the licensee is currently revising the ANA forms to include provisions for compliance with AP-27.

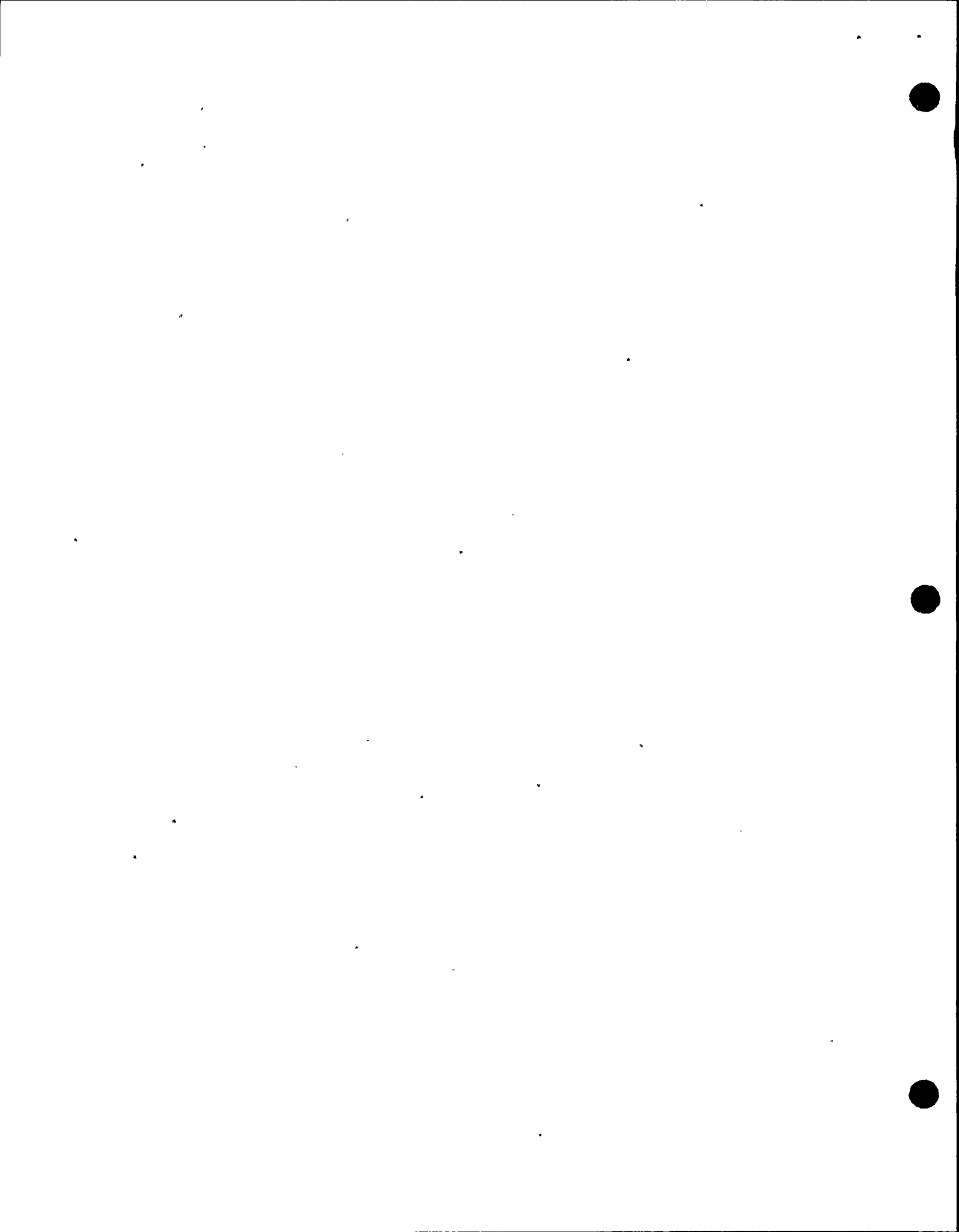
The inspector reviewed the revised draft of the proposed ANA form and concluded that the revised form has provisions for recording sufficient information consistent with the requirements of AP-27.

The inspector stated that the revised form should be further reviewed to ensure that adequate documentation is included or referenced to furnish evidence that maintenance activities of safety-related systems and components are in compliance with regulatory requirements and the Technical Specifications.

The licensee stated the revised ANA forms will be reviewed to include the inspector's comments.

This is an Unresolved Item pending completion of the revised ANA's and subsequent review by NRC.

- (b) Maintenance procedures associated with the above activities included provisions for acknowledgement of applicable Technical Specifications, Limiting Conditions for Operation that were in effect during removal of components or systems for maintenance (with the exception noted above in subparagraph (a) (2)).



- (c) System mark ups and applicable maintenance procedures provided for formal release of equipment for maintenance and required administrative approval were obtained prior to initiating the work.
- (d) Past surveillance tests were performed that included functional testing or calibration as necessary prior to returning the components or system to an operating status.
- (e) Quality control records were available for selected maintenance activities.
- (f) Maintenance activities identified above were accomplished by qualified personnel.

The inspector stated that it was extremely difficult, with the licensee's present records/system, to retrieve documentation to verify items (b) through (e) above.

The proposed revisions to the ANA forms should alleviate this problem in the future. As stated in subparagraph (1) (a) above this area will be reviewed on a subsequent inspection.

10. Status of Previously Unresolved Items

a. Battery Pilot Cell Voltage and Specific Gravity Tests (N1-ST-W11)

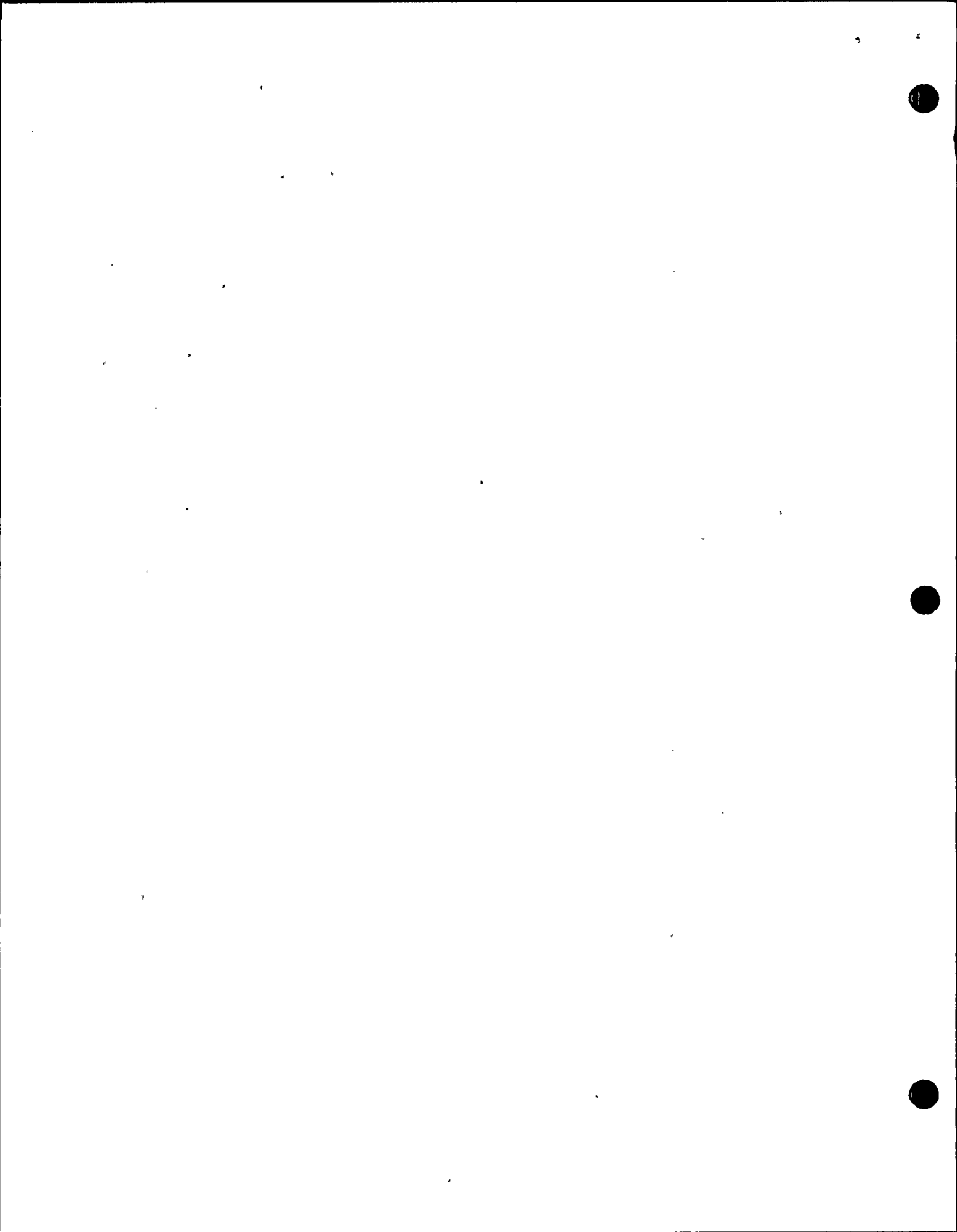
(Reference: IE Report 50-220/75-29, paragraph 6.b.(2))

The licensee reviewed the specific gravity requirements of surveillance test N1-ST-W11 and determined that the 12.00 specific gravity reading will be maintained. The licensee also reviewed the checklist data sheet and determined that the checklist is adequate to perform the surveillance test since the required acceptance criteria is contained in the procedure.

The inspector had no further questions in this area. This item is resolved.

b. Completion Status of Facility Procedures

(Reference: IE Reports 50-220/75-07, paragraph 5 and 50-220/75-29, paragraph 7.a)



The inspector noted that a total of 51 operating procedures were written or revised. By discussions with the licensee and his outside contractor and by review of the schedules for procedure implementation, revisions, and approval the inspector determined that the upgrading of the facility operating procedures has been completed.

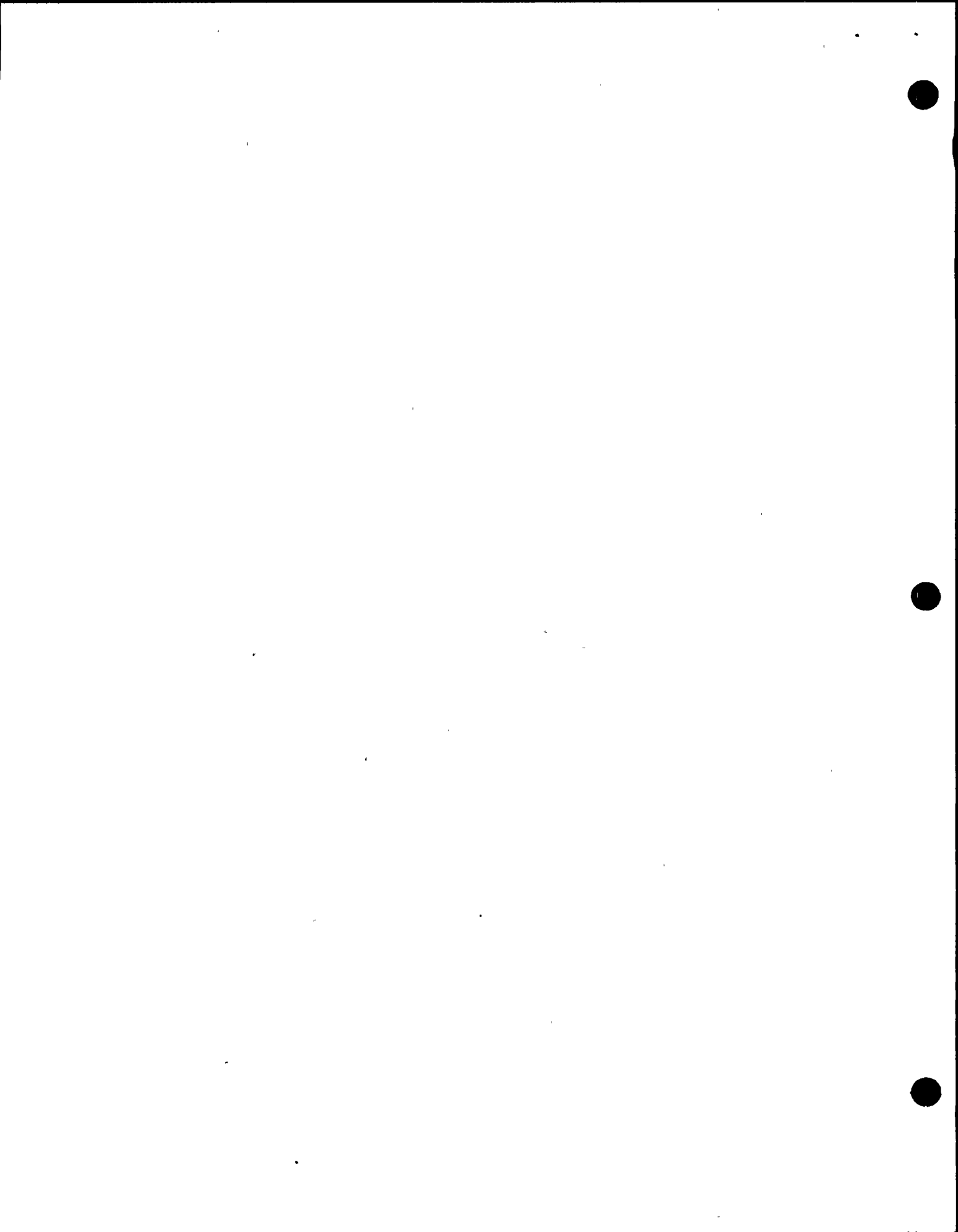
This item is considered resolved.

c. Scope of Procedural Coverage

(Reference: IE Reports 50-220/75-07, paragraph 6 and 50-220/75-29, paragraph 7.c)

- (1) Review of procedure indices and discussions with the licensee, the inspector identified no inadequacies in procedural coverage of the following areas.
 - (a) Authorities and Responsibilities for Safe Operation and Shutdown as accomplished by administrative procedure AP-2A, Composition and Responsibilities of Station or Plant Organization.
 - (b) Recall of Standby Personnel as covered by section 4.0, Supplemental Personnel, of administrative procedure AP-2A.
 - (c) Emergency Power Sources as covered by the following procedures.
 - OP-45, Emergency Diesel Generators.
 - OP-47A, 125 VDC Power System.
 - OP-47B, 24 VDC Power System.
 - OP-48, Motor Generator Sets.
 - (d) The Reactor Head and Seal Leak Detection System, due to system simplicity, is not covered by an operating procedure. This system is covered by an alarm procedure that is incorporated into section H.18 of OP-1, Nuclear Steam Supply System.
 - (e) The Area Radiation Monitoring System is covered by OP-50A, Area Radiation Monitoring System.
 - (f) The Process Monitoring System is covered by OP-50B, Process Radiation Monitoring System.

These items are resolved.



- (2) The Requirement for Periodic Review of Procedures remains questionable. The inspector reviewed Draft Revision 4 to administrative procedure AP-3, Site Operations Review Committee Procedures; and noted that this revision includes the requirement for periodic procedure review and will meet the requirements of Technical Specification section 6.8.2. The licensee has committed that the administrative procedures will be complete revised by June 1976.

This item remains unresolved.

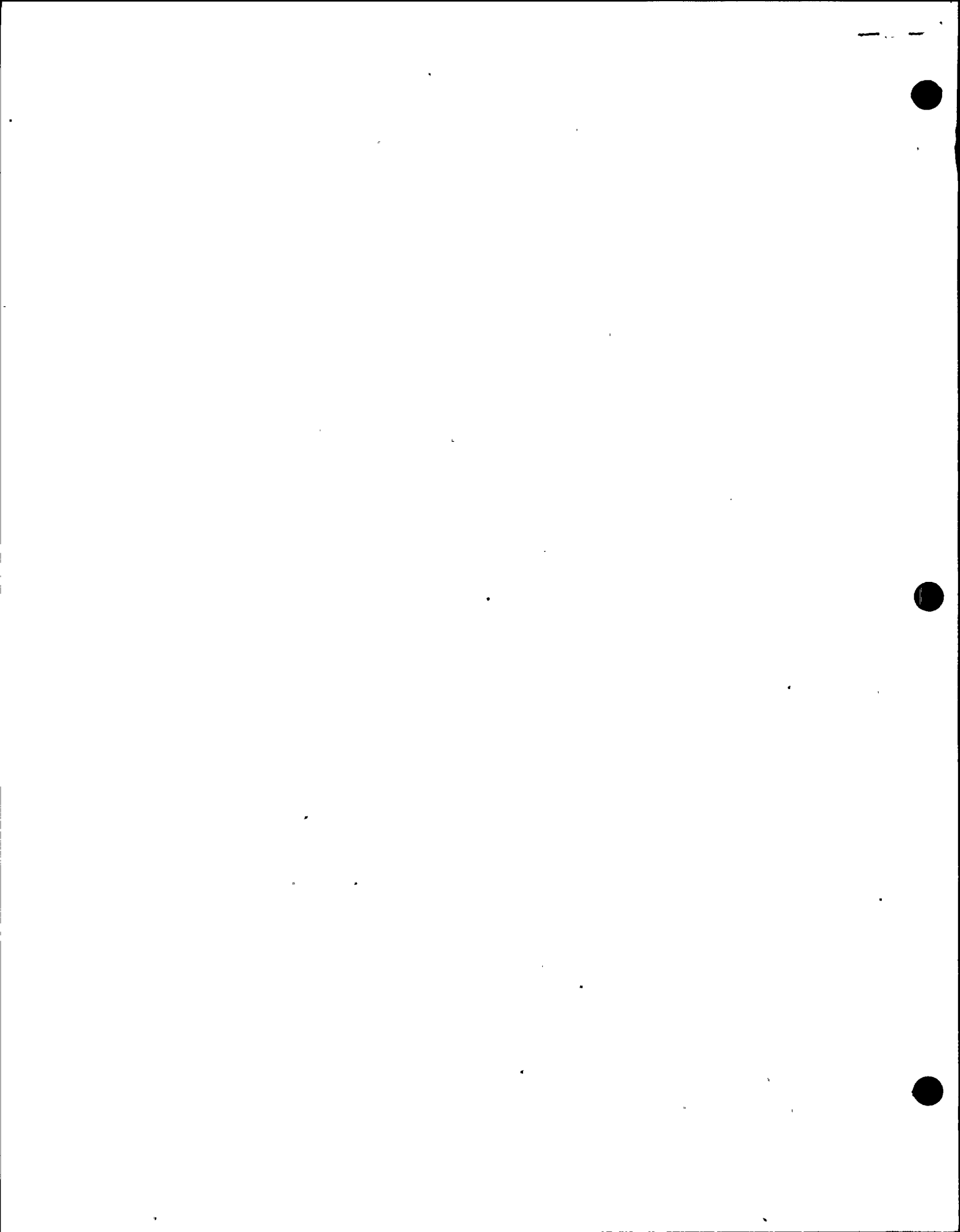
d. Preventive Maintenance Program

(Reference: IE Reports 50-220/74-16, 50-220/75-07, paragraph 4, 50-220/75-29, paragraph 7.b)

The inspector reviewed the licensee's progress in the development of the Preventive Maintenance program. The licensee has contracted with an outside vendor to develop the program and has drawn up a "Plan for the Development and Implementation of Preventive Maintenance at Nine Mile Point." The inspector noted that a few procedures were written but that no maintenance schedule or component indexes have been established.

The licensee committed in the onsite exit interview, during subsequent conversations between Messrs. T. Stetka and D. Johnson (IE:I) and Mr. T. Perkins and during a subsequent telephone conversation between Mr. E. Brunner (IE:I) and Mr. T. Lempges that the Preventive Maintenance (T&I) Program will be completed and implemented by June 1, 1976.

This item remains unresolved.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

*Klaatu Facilitate
Per.*

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

APR 19 1976

License No. DPR-63
Inspection No. 76-04
Docket No. 50-220

Gentlemen:

This refers to the inspection conducted by Mr. W. Sanders and Mr. J. Shedlosky of this office on March 30-April 1, 1976 at the Nine Mile Point Nuclear Station, Scriba, New York of activities authorized by NRC License No. DPR-63 and to the discussions of our findings held by Mr. W. Sanders with Mr. Lempges and others of your staff at the conclusion of the inspection.

Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector.

Within the scope of this inspection, no items of noncompliance were observed.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.



7

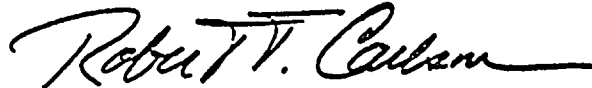


Niagara Mohawk Power Corporation

-2-

No reply to this letter is required; however, should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Robert T. Carlson, Chief
Reactor Construction and Engineering
Support Branch

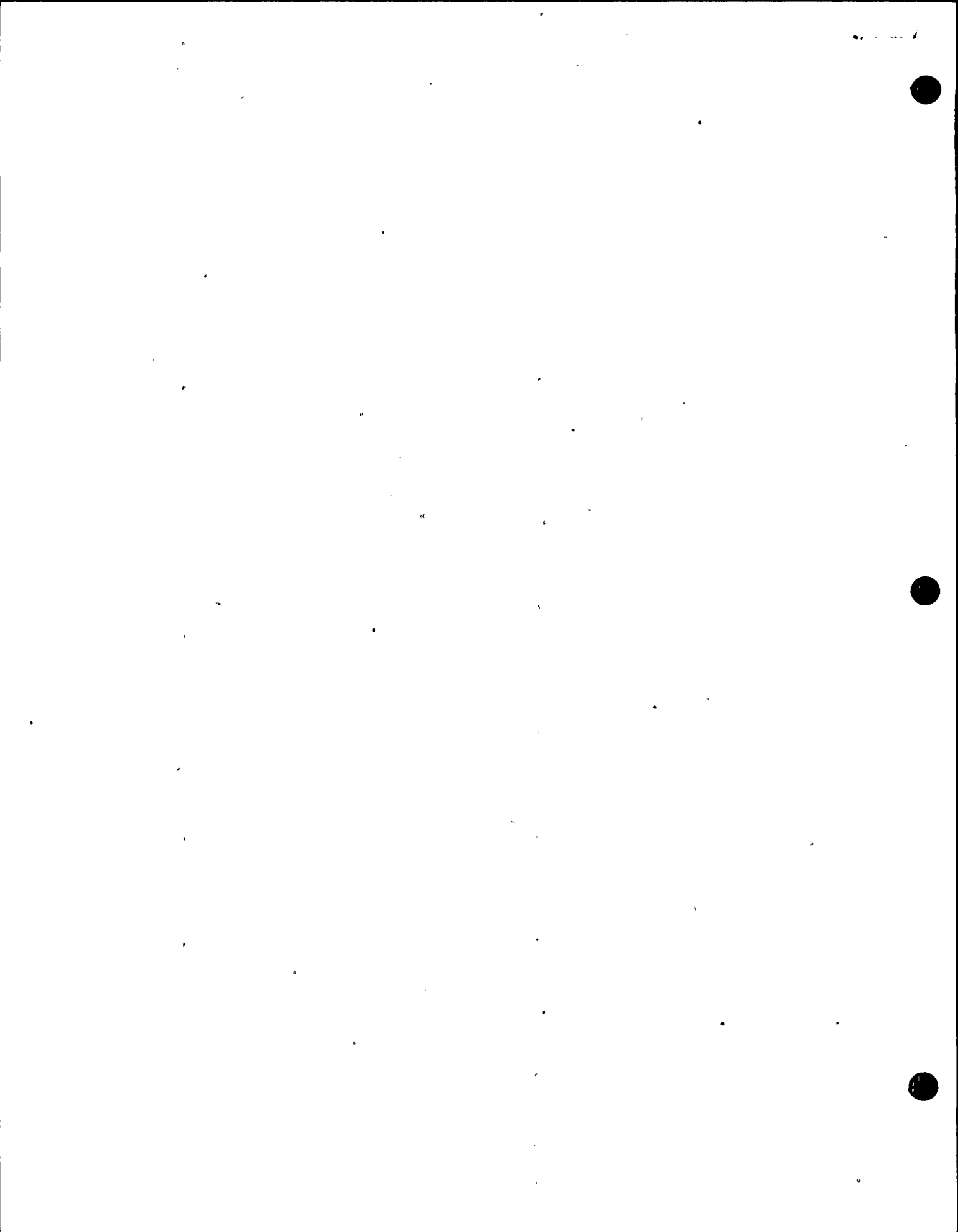
Enclosure:

IE Inspection Report No. 50-220/76-04

cc: T. E. Lempges, General Superintendent, Nuclear Generation
T. J. Perkins, Station Superintendent
C. L. Stuart, Operations Supervisor
E. B. Thomas, Jr., Esquire
A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment (Without Report)

bcc:

IE Mail & Files (For Appropriate Distribution)
PDR
Local PDR
NSIC
TIC
REG:I Reading Room
Region Directors (II, III, IV) (Report Only)
State of New York
A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment



NOTICE
APR 20 1976
REGION 1 HAS NOT OBTAINED PROPRIETARY
CLEARANCE IN ACCORDANCE WITH 10 CFR 21.60

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
REGION I

IE Inspection Report No: 50-220/76-04

Docket No: 50-220

Licensee: Niagara Mohawk Power Corporation

License No: DPR-63

300 Erie Boulevard West

Priority: _____

Syracuse, New York 13202

Category: C

Location: Nine Mile Point 1 Nuclear Station, Scriba, New York

Safeguards
Group: _____

Type of Licensee: BWR, 1850 MWT (GE)

Type of Inspection: Routine, Unannounced

Dates of Inspection: March 30 - April 1, 1976

Dates of Previous Inspection: March 9-11, 1976

Reporting Inspector: W. F. Sanders

W. F. Sanders, Reactor Inspector

4/15/76
DATE

Accompanying Inspectors: J. T. Shedlosky

J. T. Shedlosky, Reactor Inspector

4/14/76
DATE

DATE

DATE

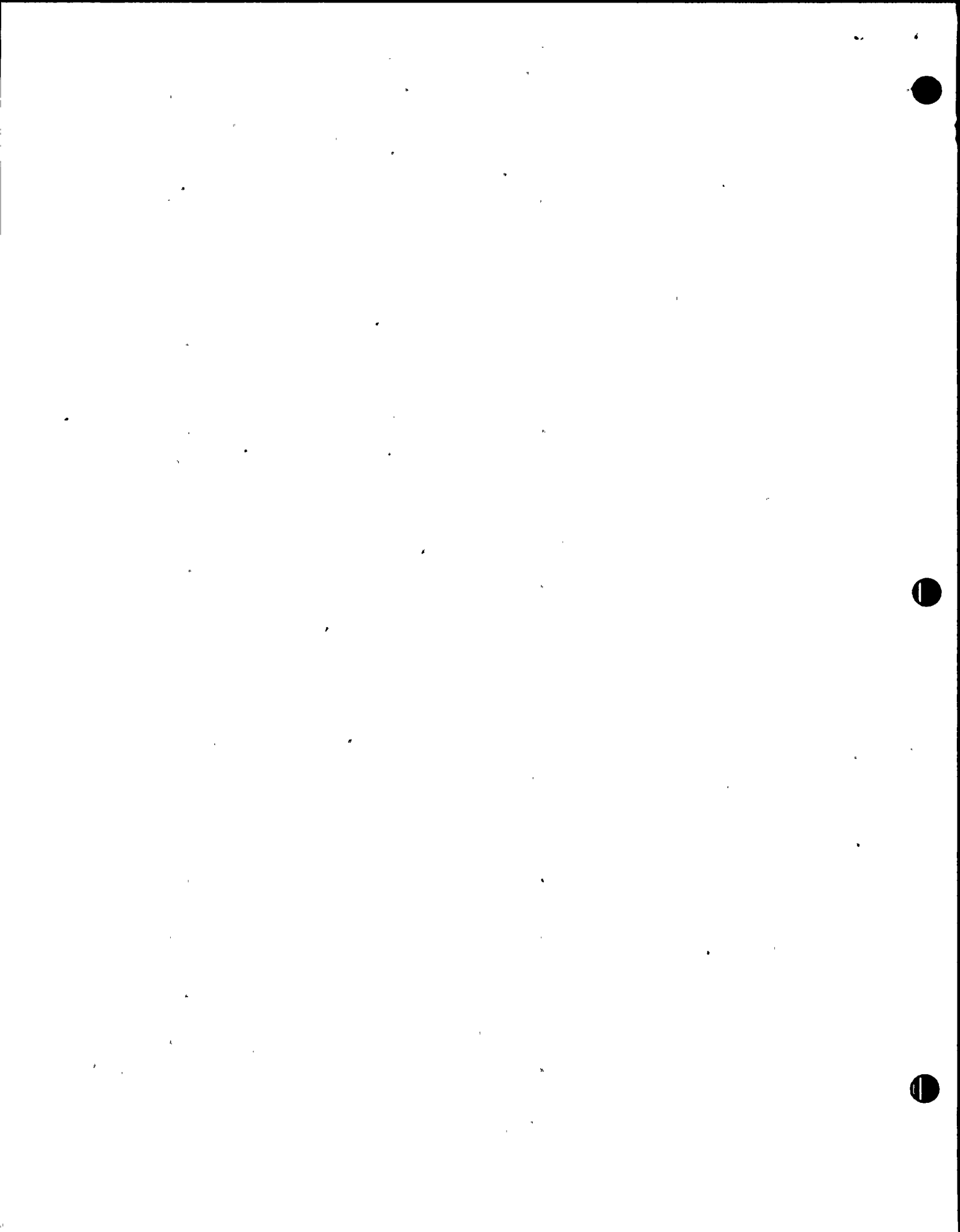
Other Accompanying Personnel: _____

DATE

Reviewed By: R. C. Haynes

R. C. Haynes, Section Chief
Engineering Support Section

4-16-76
DATE



SUMMARY OF FINDINGS

Enforcement Action

Items of Noncompliance

None

Licensee Action on Previously Identified Enforcement Items

Not Inspected

Design Changes

Not Applicable

Unusual Occurrences

A third defective elbow in the Reactor Water Clean Up system was discovered by the licensee. (Details, Paragraph 3)

Other Significant Findings

A. Current Findings

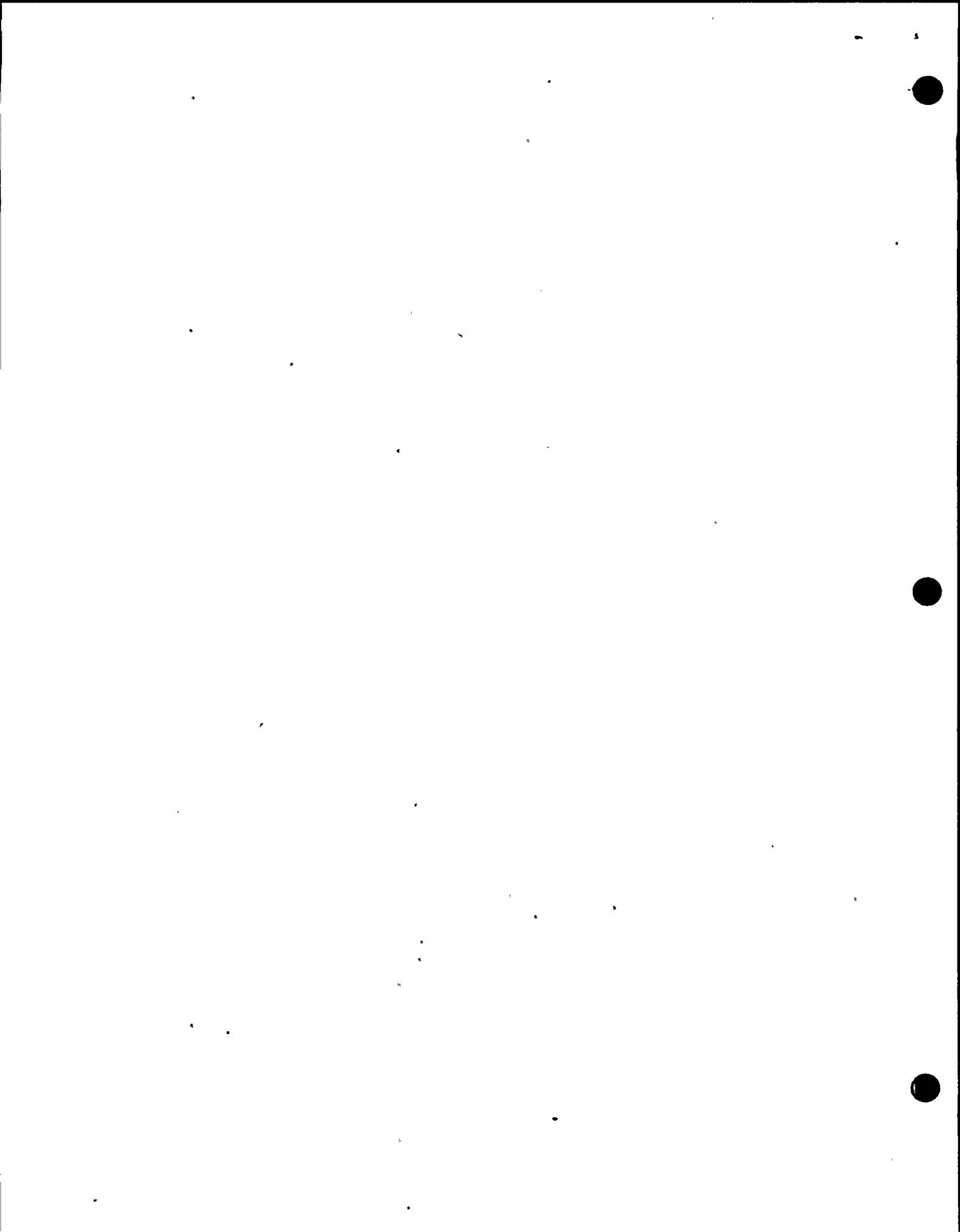
1. Acceptable Areas

a. Ultrasonic Testing

The ultrasonic test procedures and related records used to locate the defective elbows in the Reactor Water

b. Radiography

Inspection of radiography film and procedures used for replacement welds for an evaluation of radiograph quality. (Details, Paragraph 5)



c. Observations

A visual inspection of the work in progress in the Reactor Water Clean Up (R.W.C.U.) system to observe the welding and fit up of replacement pipe sections. Visual inspections were also made of the 6" RWCU lines and the head spray and vent lines inside of the dry well. (Details, Paragraph 6)

d. Defective Pipe Sections

A visual inspection was made of the defective sections of removed pipe to select specimens for metallography studies. (Details, Paragraph 7)

2. Unresolved Items

Defective Pipe Sections. (Details, Paragraph 7)

B. Status of Previously Reported Unresolved Items

Not Inspected

Management Interview

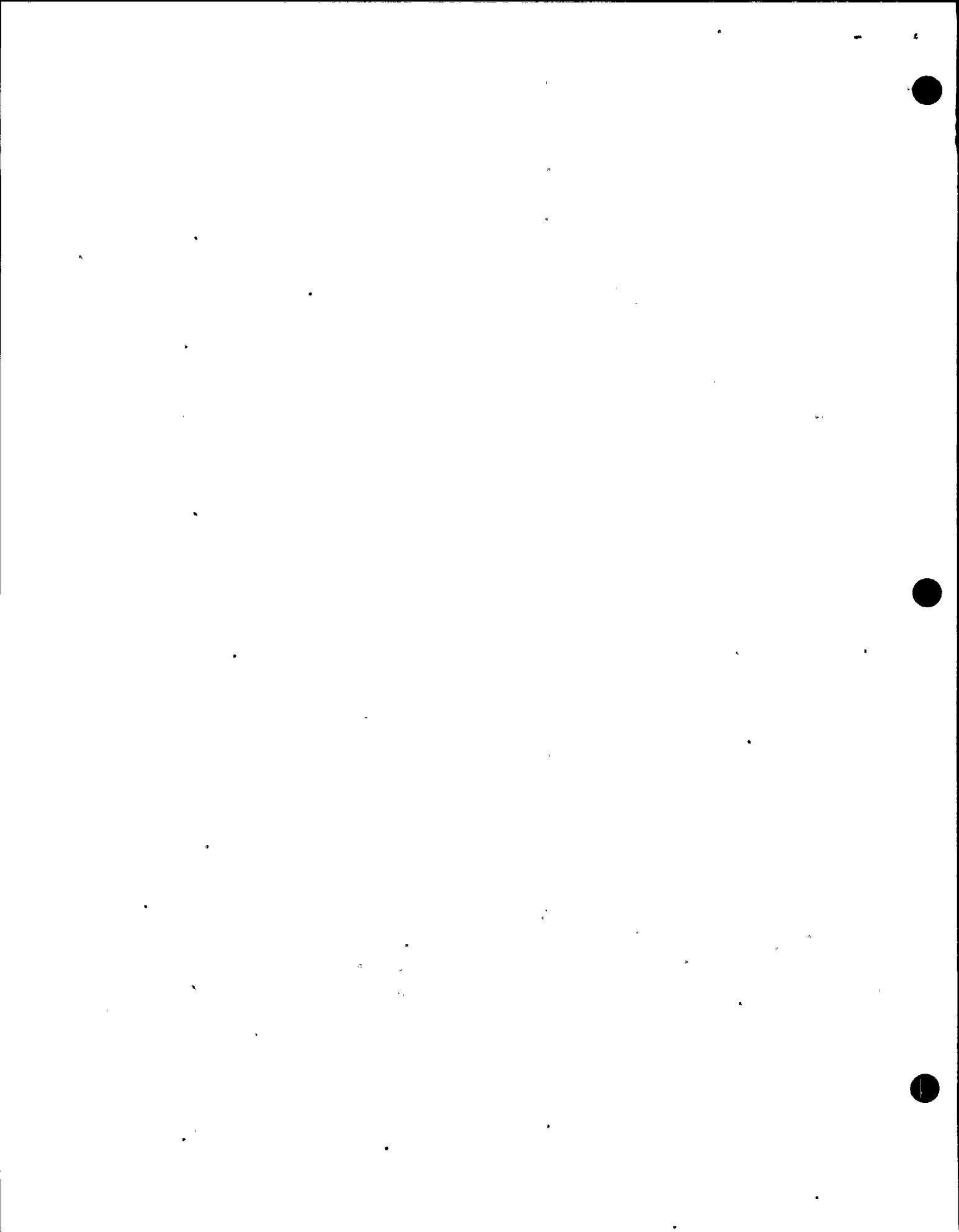
At the conclusion of the inspection a management interview was held at the site with the following persons.

Niagara Mohawk Power Corporation

- T. E. Lempges, General Superintendent, Nuclear Generation
- T. J. Perkins, Station Superintendent
- G. R. Leskew, Assistant Quality Control Supervisor

Items Discussed

- A. The inspector stated that this inspection was made to observe the work in progress and review procedures and records related to the ultrasonic testing and replacement of defective pipe sections in the reactor water clean up system. The following items were inspected.



B. Ultrasonic Testing

The procedure and related records used in the program to inspect and identify the defective pipe elbows were examined. No deficiencies were identified. (Details, Paragraph 4)

C. Defective Pipe Sections

An inspection was made of the test certifications for the material used in the manufacturer of the defective pipe elbows. The inspector stated that the N.R.C. would attempt to trace the material to the original manufacturer and would request material samples to be used for a metallurgical analysis to determine the cause of defects. This is considered unresolved. (Details, Paragraph 7)

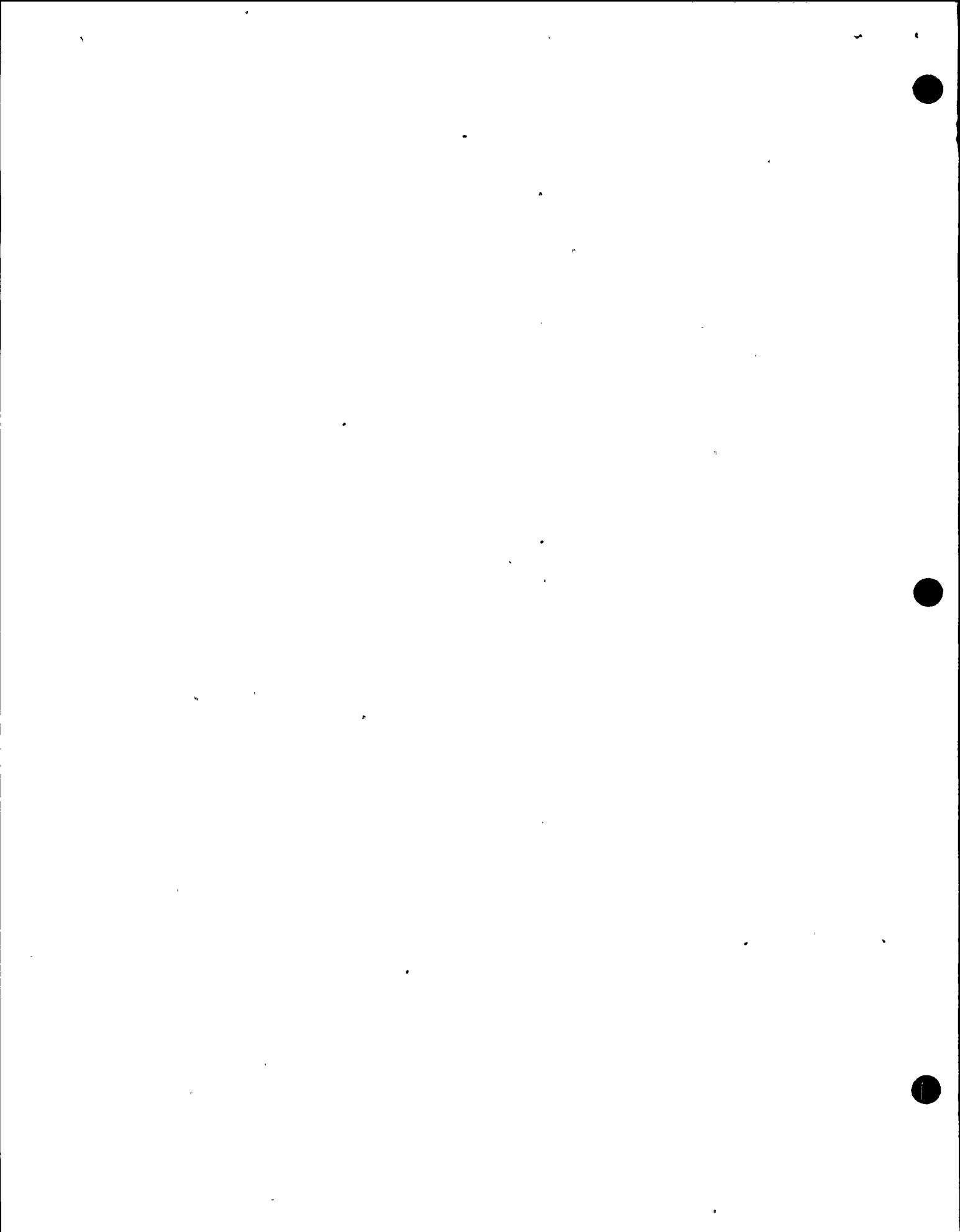
D. Radiography

An inspection was made of the radiography film and the procedures used to inspect the quality of the replacement pipe welds, to evaluate the Radiographic Quality. No deficiencies were identified. (Details, Paragraph 5)

E. Observations

A visual inspection was made of the defective pipe sections which were removed from the reactor water clean up system and had been placed in a high radiation storage area for disposition. A visual inspection was also made of the replacement work to observe pipe fit ups and welding.

A visual inspection was made inside the primary containment, of the reactor water clean up lines. The control rod hydraulic return lines, the head spray lines and the head vent lines. No deficiencies were identified. (Details, Paragraph 6)



DETAILS

1. Persons Contacted

Niagara Mohawk Power Corporation

T. Lempges, General Superintendent, Nuclear Generations
T. Perkins, Station Superintendent
G. Leskew, Assistant Quality Control Supervisor
C. Stuart, Operations Supervisor
R. Barker, Maintenance Supervisor
M. Sillman, Results Supervisor
T. Denti, Reactor Analyst Supervisor
F. Hawksley, Assistant to the General Superintendent

2. This inspection was made to inspect the activities, procedures, records and all of the pertinent information related to the defective pipe elbows discovered in the reactor water clean up system.

3. Summary of Events

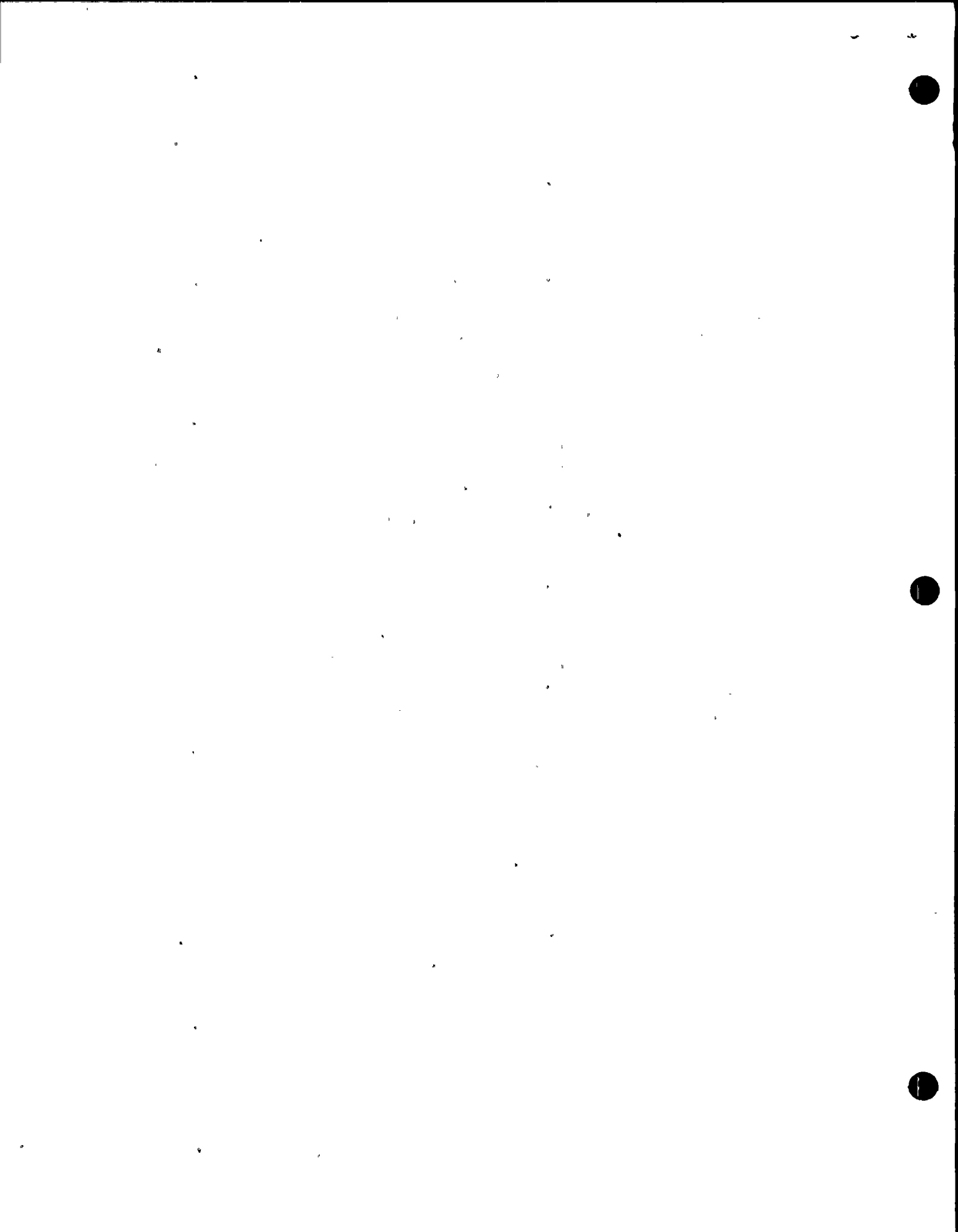
On November 28, 1975, a section of 6" schedule 80 type 304 stainless steel pipe elbow between valve 33-04 and the regenerative heat exchanger was found leaking.

This section was removed and replaced, and inspected by IE:I inspector. (Report No. 75-33).

J. G. Sylvester associates, an independent consultant, reported by letter of December 3, 1975 that the predominant cracking mode was transgranular, typical of stress corrosion cracking. The defective elbow was sent to a. G. E. Laboratory in Mallecitos, California for metallography and metallurgical test to determine probable cause of failure.

On March 19, 1976 the second pipe elbow was found to be leaking and on March 22, 1976 the third pipe elbow was found to be leaking.

A program was started to ultrasonic (UT) examine all stainless steel pipe 2" and over which was cold bent during fabrication. The results of the tests revealed four (4) 6" schedule 80 bends and (2) 2" schedule 80 pipe bends with unacceptable UT indications. All of these have been removed and replaced.



4. Ultrasonic Testing

The inspector reviewed the ultrasonic testing procedure N.I.P. 554 Rev. 0, 8-9-75 which complies to the requirements of A.S.M.E. Section XI, 1974 and summer of 1974 addendum.

I.D. and O.D. notches were used for calibration to simulate anticipated cracking conditions. A notch 10% of the wall thickness was used as suggested by A.S.M.E. Section XI, Article III Winter 75 addendum.

Acceptability was determined by comparison of detected indications to the notch response as described in Procedure N.I.P. 554 addendum 5530-17.

The results of the tests are documented with calibration records which include the pertinent equipment information and sketches which show the indications, amplitudes, orientation and locations.

No deficiencies were identified.

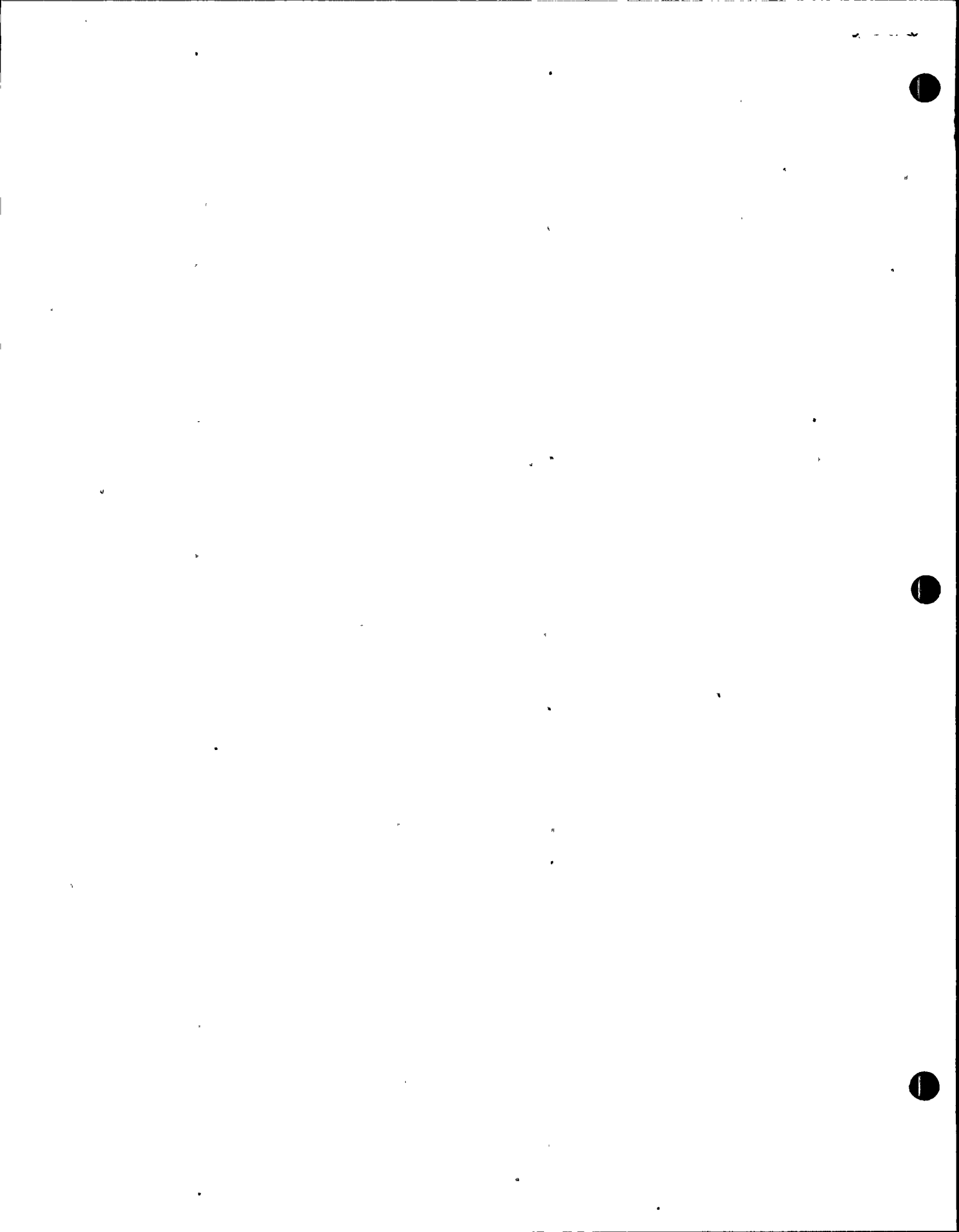
5. Radiography

The inspector selected radiograph film of four (4) welds to evaluate the penetrometer image, the subject definition, film contrast and artifacts and film marks which could mark areas of interest. The film selected were in line R.C.U. 39, Welds 22A, 22B, 22C, 22D. The inspection of the radiographic quality did not reveal any deficiencies.

6. Observations

- a. The defective pipe sections which had been removed from the reactor water clean up system were transferred to a high radiation storage area to await disposition. An inspection was made to look for material identity numbers or surface defects, presence of oxides, residues contaminants or any unusual conditions that could be pertinent to the problem. A visual inspection of the welding and fit ups of the replacement sections was made. No deficiencies were identified.

A visual inspection was also made in the primary containment of the condition of the remaining pipe elbows in the reactor water clean up, control rod hydraulic return lines, head spray lines and head vent lines. No deficiencies were identified.



7. Defective Pipe Sections

IE:NRC, independent of the licensee's agents' evaluation of the pipe leaks, has contracted with Battelle-Columbus Ohio, to provide technical assistance and consultation on the metallurgical aspects of leaks in the Reactor Water Clean Up piping. Battelle will perform the necessary chemical, mechanical, and metallurgical examinations and tests to determine the character and probable cause of defects.

The pipe sections that were selected are listed below:

- a. R.C.I. 29 C
- b. R.C.U. 38
- c. R.C.U. 37 EB
- d. Elbow section from top head vent

This item remains unresolved pending a review of the Battelle test results by the USNRC.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

KFB

MAR 25 1976

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

License No. DPR-63
Inspection No. 76-03
Docket No. 50-220

Gentlemen:

This refers to the inspection conducted by Mr. J. Shedlosky of this office on March 9-11, 1976 at the Nine Mile Point Nuclear Station, Scribba, New York, of activities authorized by NRC License No. DPR-63 and to the discussions of our findings held by Mr. Shedlosky with Mr. Perkins of your staff at the conclusion of the inspection.

Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

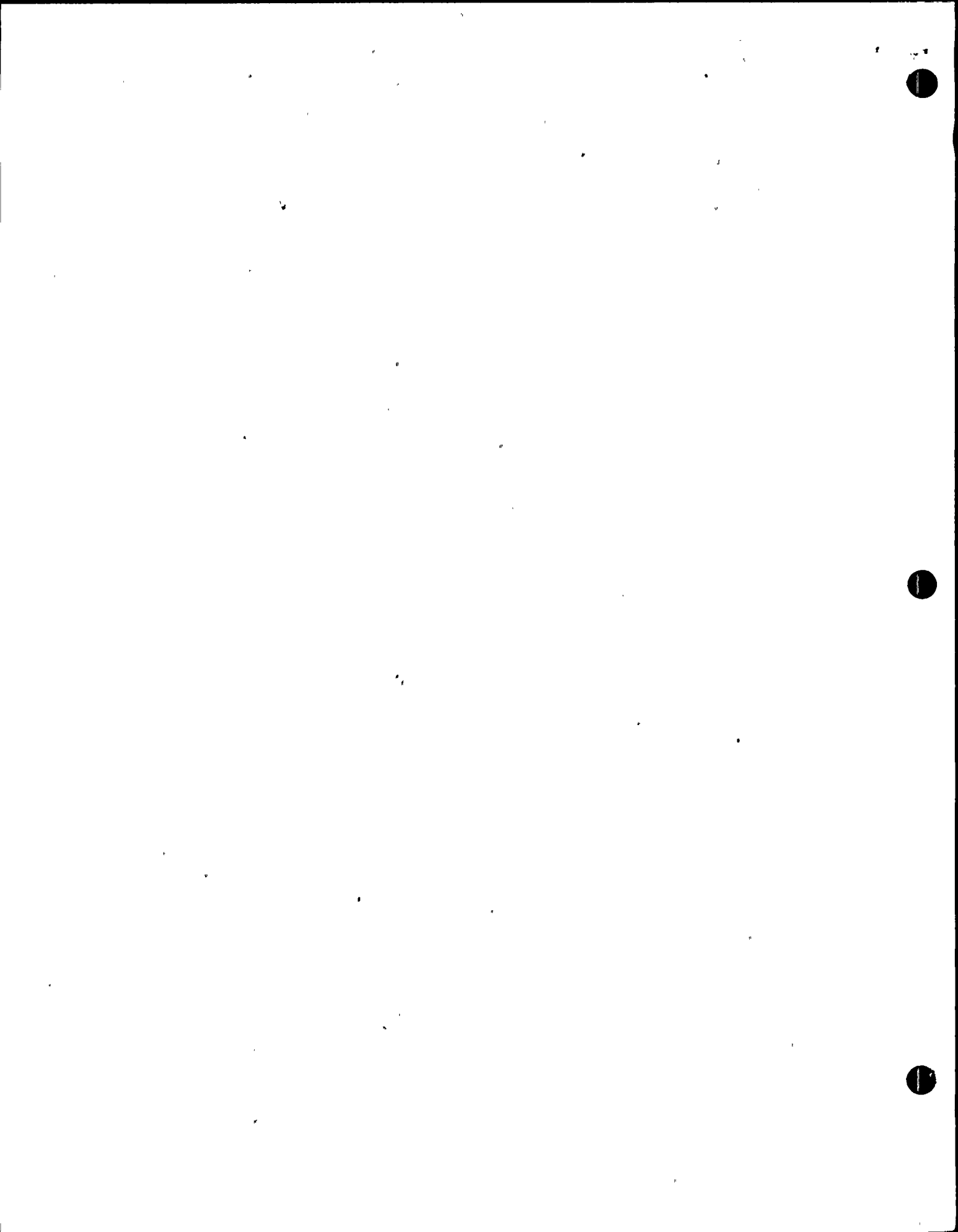
In addition, our inspectors examined the status of completion and implementation of your revised facility procedures program covered in your letter to this office dated December 26, 1975. We have no further questions regarding this matter at this time.

Within the scope of this inspection, no items of noncompliance were observed.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

7





No reply to this letter is required; however, if you should have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch

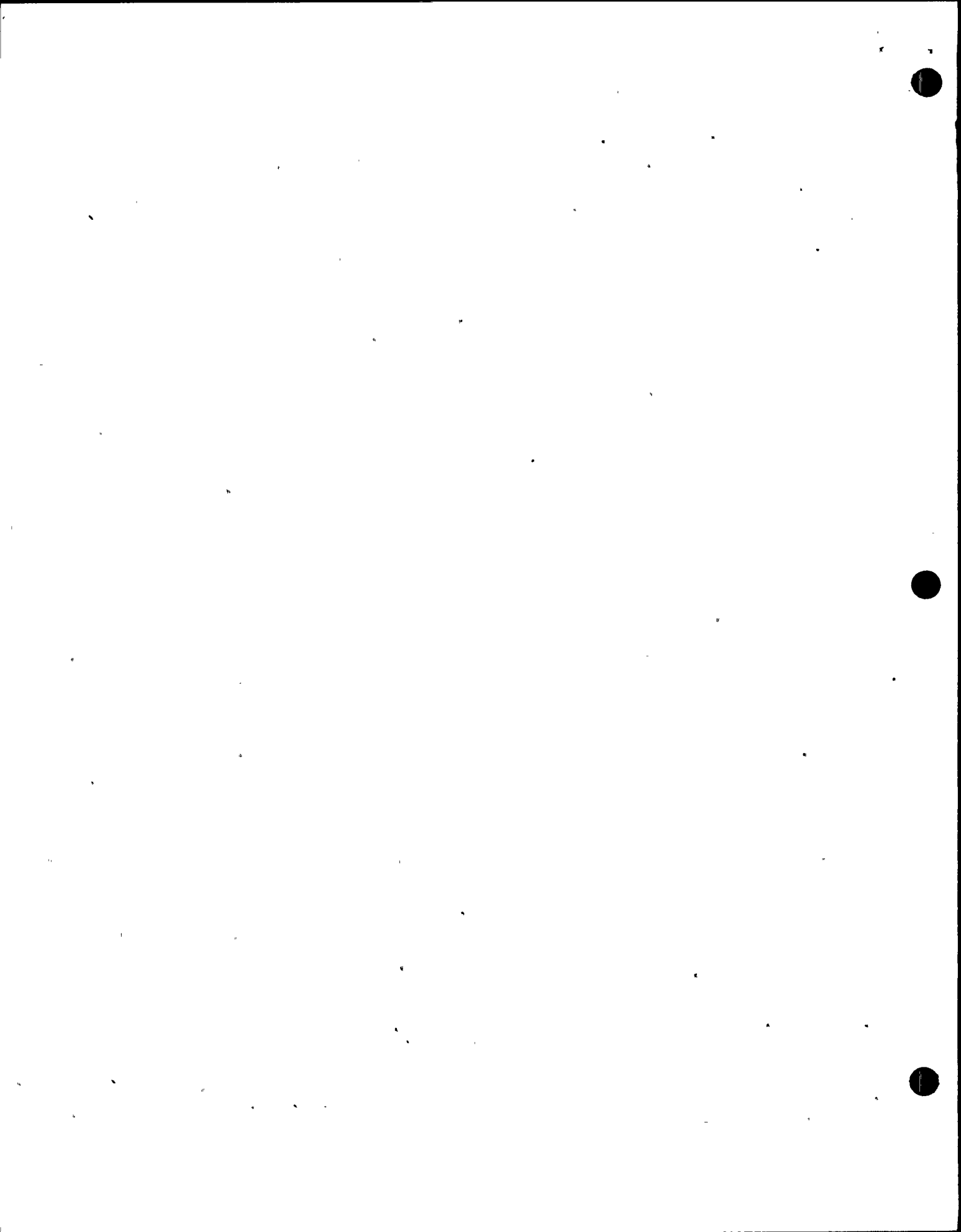
Enclosure:

IE Inspection Report No. 50-220/76-03

- cc: T. E. Lempges, General Superintendent, Nuclear Generation
- T. J. Perkins, Station Superintendent
- C. L. Stuart, Operations Supervisor
- E. B. Thomas, Jr., Esquire
- A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment (Without Report)

bcc:

- IE Mail & Files (For Appropriate Distribution)
- PDR
- Local PDR
- NSIC
- TIC
- REG:I Reading Room
- State of New York
- A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment



U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
REGION I

IE Inspection Report No: 50-220/76-03

Docket No: 50-220

Licensee: Niagara Mohawk Power Corporation

License No: DPR-63

300 Erie Boulevard West

Priority: _____

Syracuse, New York 13202

Category: C

Safeguards Group: _____

Location: Nine Mile Point 1 Nuclear Station, Scriba, New York

Type of Licensee: BWR, 1850 Mwt (GE)

Type of Inspection: Routine, Unannounced

Dates of Inspection: March 9-11, 1976

Dates of Previous Inspection: January 27-30, 1976

Reporting Inspector: J. T. Shedlosky
J. T. Shedlosky, Reactor Inspector

3/24/76
DATE

Accompanying Inspectors: L. J. Norrholm
L. J. Norrholm, Reactor Inspector

DATE

DATE

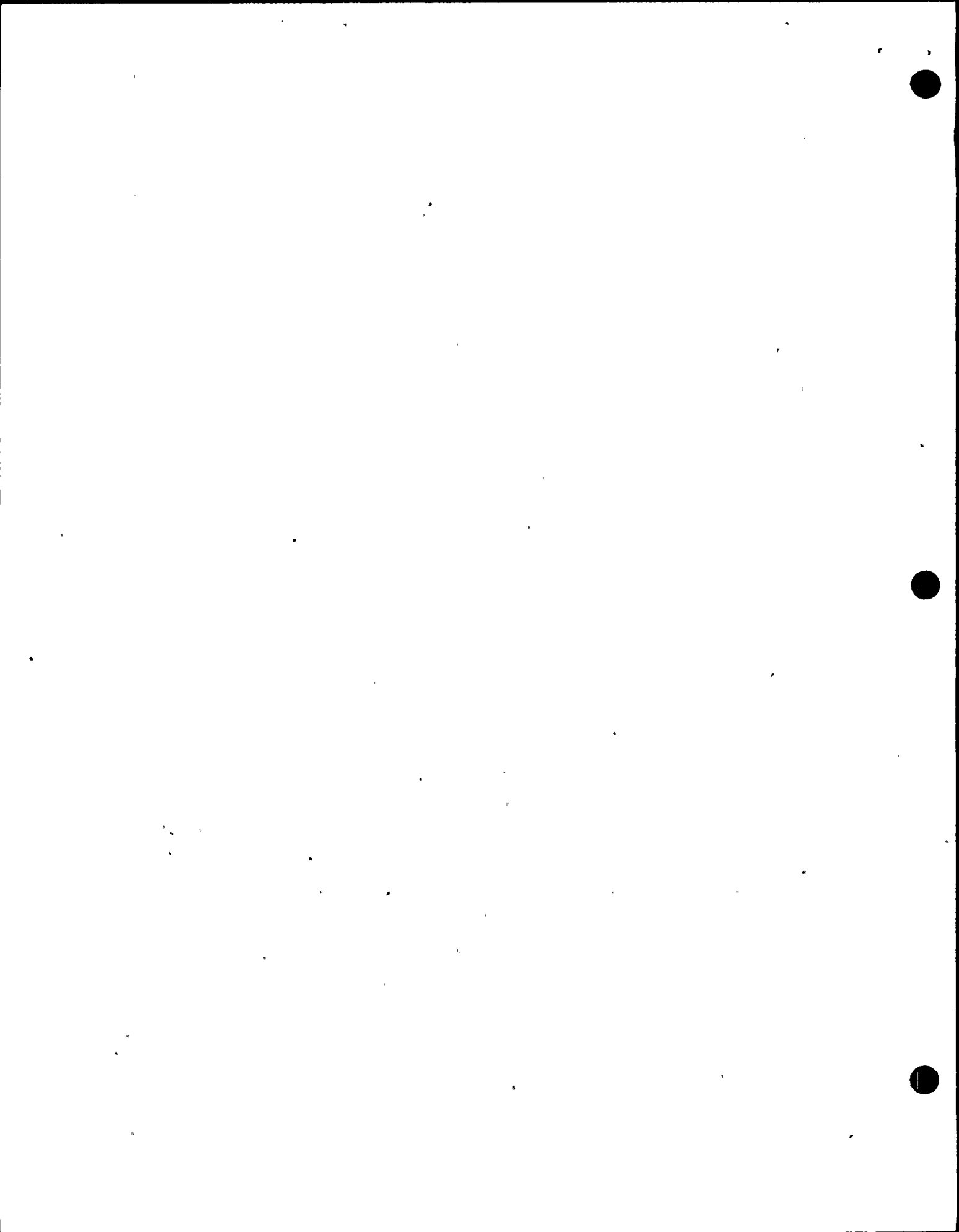
DATE

Other Accompanying Personnel: None

DATE

Reviewed By: D. L. Capton
D. L. Capton, Section Chief
Reactor Projects, Section No. 2

3/24/76
DATE



SUMMARY OF FINDINGS

Enforcement Action

None.

Licensee Action on Previously Identified Enforcement Items

Not inspected.

Design Changes

None Identified.

Unusual Occurrences

None.

Other Significant Findings

A: Current Findings

1. Acceptable Areas

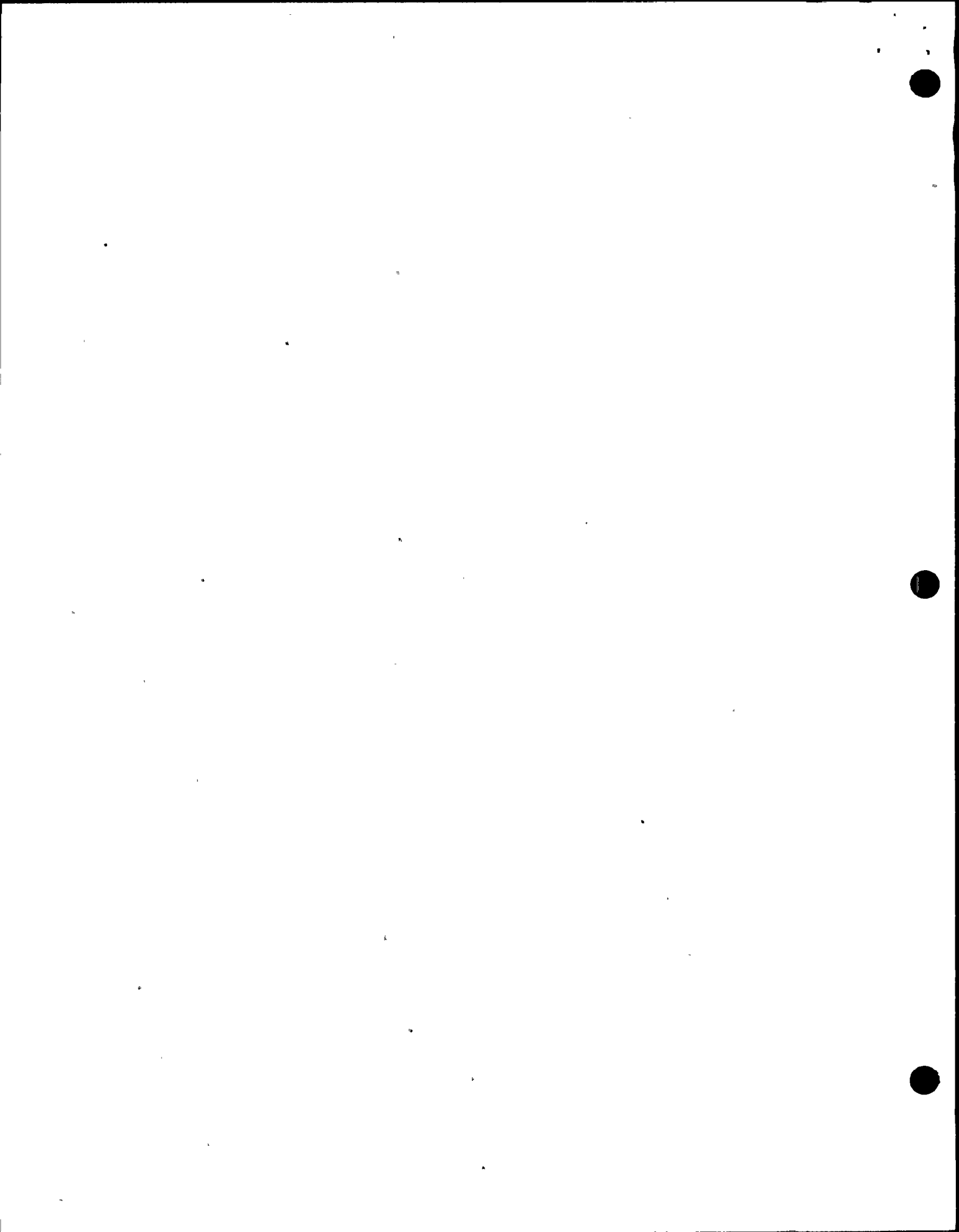
(These are areas which were inspected on a sampling basis and did not involve an Item of Noncompliance, Deviation or an Unresolved Item).

- a. A review of Plant Operations including record review and plant tours.
- b. To ascertain whether appropriate controls have been developed to minimize potential fire and safety hazards.
- c. A review of Nonroutine Reports 75-33 through 76-1.
- d. To correlate plant records with information in the Annual Report and ascertain if technical specifications reporting requirements are met.

2. Unresolved Items

(These are items for which additional information is required in order to determine if the item is acceptable, a Deviation or an Item of Noncompliance).

None.



3. Followup Items

(These are items of inspectors' concern which require additional research and will be reviewed in a subsequent report).

75-30-1 Surveillance Testing - Valve Timing (Closed).

75-30-2 Surveillance Testing - Acceptance Criteria HPCI Flow Tests.

4. Infractions and Deficiencies Identified by the Licensee

None.

B. Status of Previously Reported Unresolved Items

1. Facility Procedures Including the Preventive Maintenance Program: Reference Inspection Report 50-220/75-07, Paragraph 7.

Progress toward completion and implementation of revised facility procedures was found to meet the schedule in the licensee's letter to Region I, dated December 26, 1975. This program will be revisited in detail during a future inspection.

2. Analysis of Through the Wall Failure of a Section of Pipe Leading to the Regenerative Heat Exchanger: Reference Inspection Report 50-220/75-33.

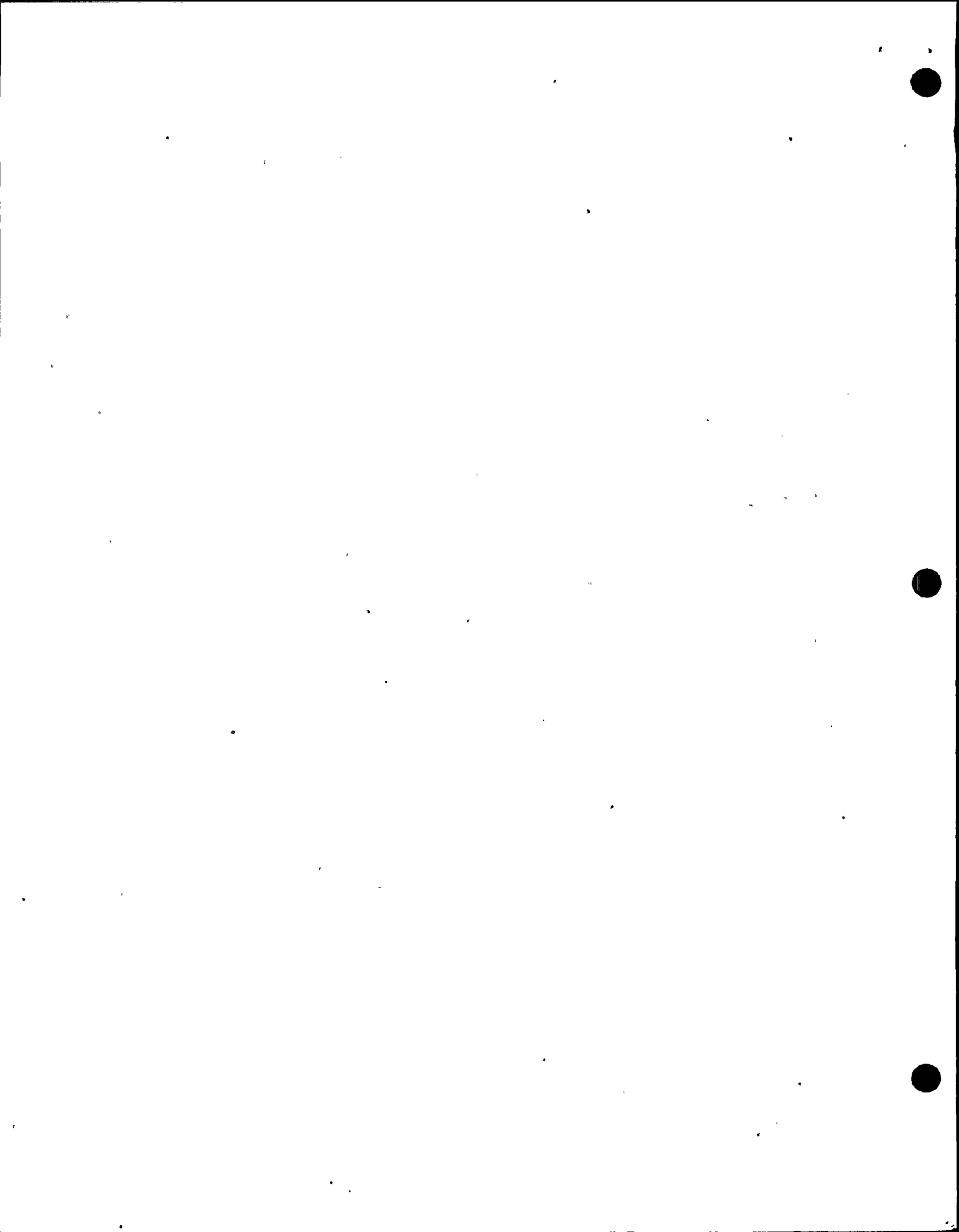
The inspector was informed that the licensee expects to have this failure analysis the week of March 15, 1976. This will be reviewed during a future inspection.

Management Interview

A management interview was conducted on March 11, 1976 with Mr. T. J. Perkins and Mr. C. L. Stuart. Items discussed are summarized below.

A. General

The inspector stated that the scope of the routine inspection included a review of plant operations, logs and records, facility tours, shift manning, a review of selected nonroutine event reports. Included in the facility tour were observations concerning the implementation of controls to minimize potential fire and safety hazards. Included in the record review was a correlation of information contained in the annual report and a review of the annual report based on Technical Specifications requirements.



B. Inspection Findings

The inspector stated that no additional Items of Noncompliance or Unresolved Items were identified. The inspectors observed an improvement of area conditions concerning radiation protection and cleanliness. Other items noted were: There was evidence of some smoking in the Reactor and Turbine Buildings; Emergency Cooling System Steam Line RTD's had connection box covers removed; and a temporary condensate pump discharge header pressure gauge was installed.

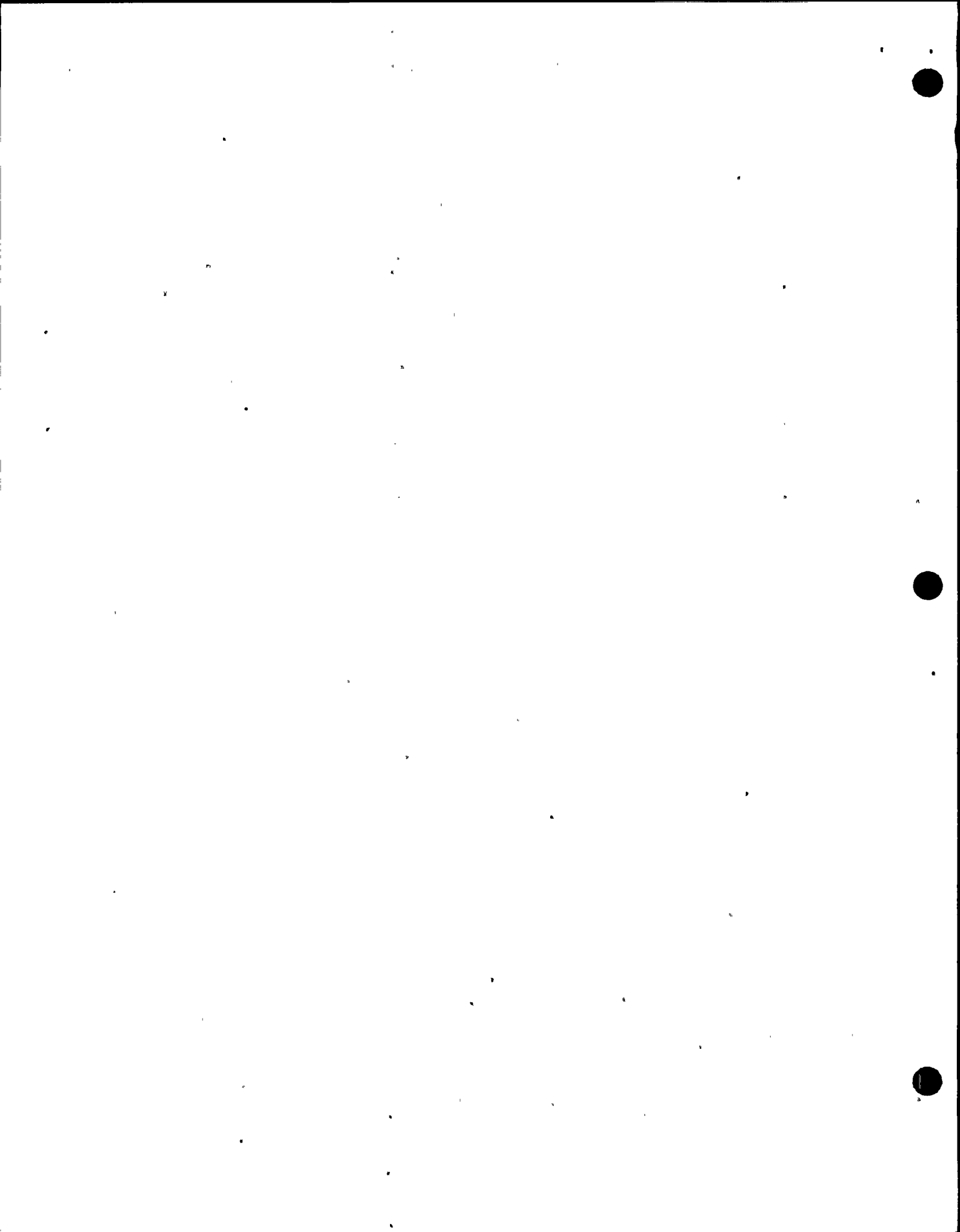
The inspectors were informed that the RTD connection covers were being replaced and that an ANA for a permanent gauge installation had been issued.

During the review of facility records the inspectors noted that control of issued jumper/lifted lead authorizations could be lost as the log pages are not serial numbered. The inspectors also discussed their review of the jumpering of mode switch contacts during the last refueling outage.

The licensee agreed to consider these items.

The inspectors were informed that, although administrative procedures to implement ANSI N 45.2.3-1973 have not been prepared, assignments of responsibility for plant cleaning have been made.

The inspectors agreed that this system was working well.



DETAILS

1. Persons Contacted

Mr. T. E. Lempges, General Superintendent, Nuclear Generation
Mr. T. J. Perkins, Station Superintendent
Mr. C. L. Stuart, Jr., Operations Supervisor
Mr. T. J. Dente, Reactor Analyst Supervisor
Mr. J. Duell, Assistant Radiochemistry and Radiation Protection Supervisor
Mr. E. W. Curry, Station Shift Supervisor
Mr. M. D. Jones, Station Shift Supervisor
Mr. W. Drews, Station Shift Supervisor
Mr. W. Johnson, Shift Operating Foreman
Mr. S. Domago, Nuclear Auxiliary Operator

2. Review of Plant Operations

a. Shift Logs and Operating Records

The inspectors reviewed the records listed below. The review was governed by the Technical Specifications and Administrative Procedure Requirements.

(1) Station Shift Supervisor Log

Volume 140	10/3/75
Volume 153	2/24 - 3/8/76
Volume 154	3/8 - 10/76

(2) Shift Operating Foreman Log

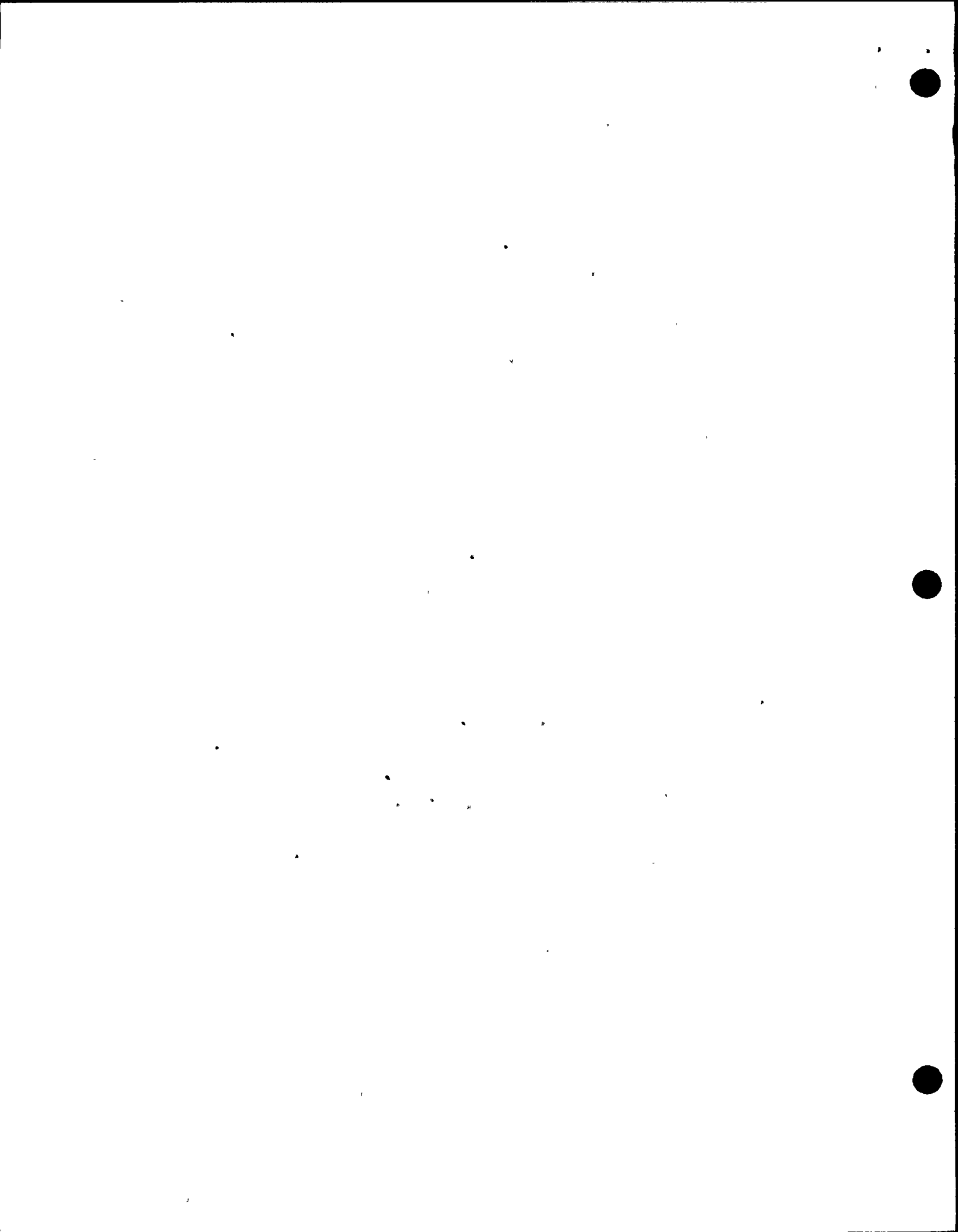
Volume 152	10/3 - 16/75
Volume 153	10/16 - 10/75
Volume 158	12/5 - 15/75
Volume 159	12/16 - 28/75
Volume 164	2/22 - 3/5/76

(3) Jumper Log

Active jumper
Cleared log entries for last quarter

(4) Standing Orders

NMPSO-4.	Patrol Instructions
NMPSO-5	Surveillance Testing
NMPSO-9	Drywell/Torus Differential Pressure



(5) Station Shift Supervisor Instructions

1/7 - 2/26/76

(6) Equipment Mark-Up Log

Those mark-up active during the last quarter

The inspection consisted of verifying adequate management review, correct identification of problem areas, completeness of entries and determination that conditions contrary to the Technical Specifications did not exist. The inspectors discussed the circumstances concerning the placement of jumpers on the reactor mode switch on 10/3/75 from 0020 to 0205. Within the scope of this review, no significant discrepancies were noted.

The inspectors noted that approved administrative procedures do not implement the plant housekeeping requirements of ANSI N45.2.3-1973. However, assignments have been made for plant area cleaning responsibilities. During the facility tour the inspectors noted a considerable improvement in plant housekeeping.

b. Tours of Accessible Areas

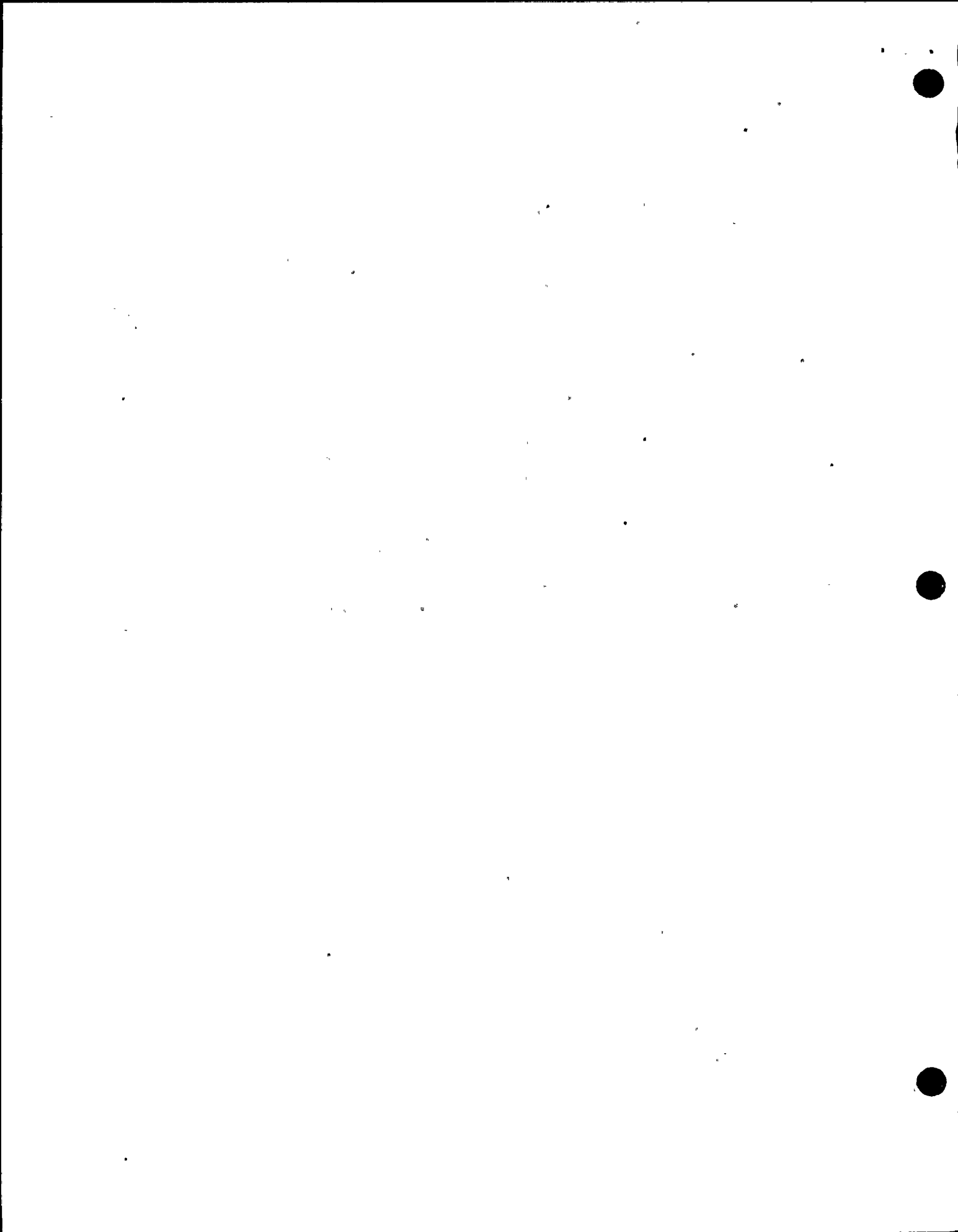
The inspectors observed operations in the Control Room including a shift turnover. Tours were made of the reactor building, turbine building, and the new off-gas system building.

(1) Instrumentation

The inspectors observed various process instruments for correlation between channels and for conformance with the Technical Specification limits. Process parameters included the Emergency Cooling System, SLC and off-gas instruments.

(2) Annunuator Alarms

The inspector observed various alarm conditions that were received and acknowledged. These conditions were discussed with the Shift Operating Foreman and Station Shift Supervisors who were knowledgeable of the alarms and actions required. Continuous alarms were identified and reasons for these known.



(3) Shift Staffing

The operating shift was observed to be staffed to meet the requirements of Section 6 of the Technical Specifications both to number and type of licenses. Control Room manning was observed to be in conformance with NMPSO-2 "Control Room Procedure."

(4) Radiation Protection Control

The inspector noted an improvement in controls including "self-monitoring" practices at check points and the disposal of protection clothing. Radiation control zones observed in the plant were properly established and identified.

(5) Plant Housekeeping Conditions

Storage of material and components was observed with respect to prevention of fire and safety hazards. Selected fire fighting equipment was examined. The inspector noted a significant improvement in the general plant conditions since the refueling outage.

(6) Existence of Fluid Leaks

Very few minor leaks were noted during the tour. The operator was aware of the source and the inspectors had no further questions on this matter.

(7) Piping Vibration

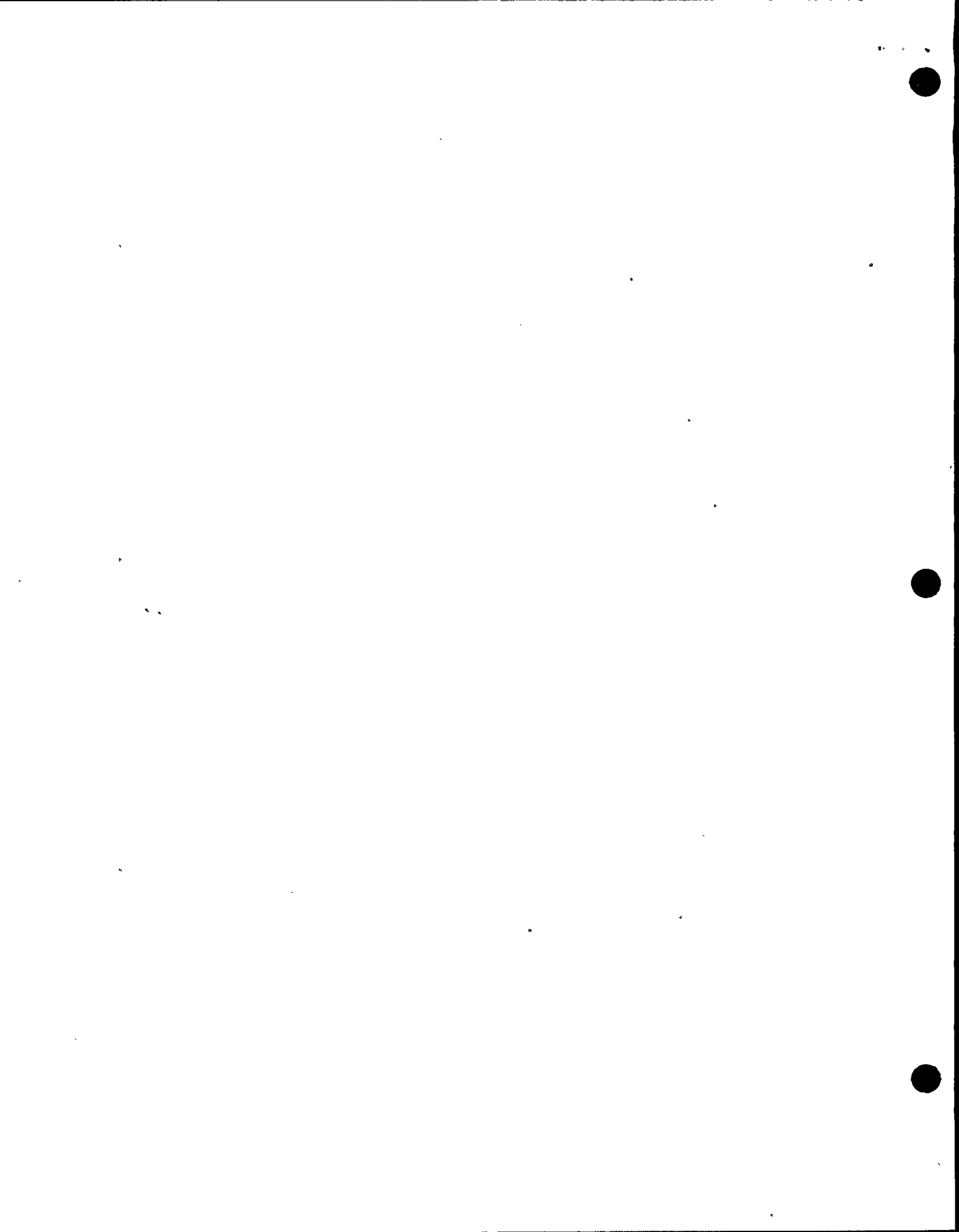
No excessive piping vibration was noted.

(8) Pipe Hangers/Seismic Restraints

Several pipe hangers and seismic restraints on safety related systems were observed. Included were those on the Emergency Cooling System. Findings were acceptable.

(9) Valve Position/Equipment Start

Positions - The lineup of valves and power supplies in the core spray and SLC Systems were observed to be in the positions required by operating procedures to be in conformance with Technical Specifications conditions for operation.



(10) Equipment Mark-ups

As indicated above, the log of active equipment mark-ups was reviewed, and during the tour the inspectors observed that selected equipment under Tag, which was primarily non-safety related, was consistent with the information contained in the control room log. Cleared mark-ups were reviewed as indicated above.

(11) Instrument Channels

Instrument channels checks were reviewed on the shift logs. An independent comparison was made with selected instruments.

3. Review of Nonroutine Event Reports

Licensee Event Reports of Reportable Occurrences 75-33 through 76-1 were reviewed. Of these occurrences the following was inspected-- 75-35. The inspection consisted of verification of the details of the report and inspection of the corrective action taken, including the required review by safety committees. The circumstances surrounding the occurrences were reviewed to determine if Technical Specifications limits were exceeded. In addition, the circumstances surrounding the failure to analyze a daily stack sample for iodine and particulates (Occurrence 75-39) were discussed. This item will be followed up during a separate inspection conducted by the Radiation Support Section.

Chloride Ion Concentration Exceeded Technical Specification Limits During a Reactor Startup (75-35)

The inspector verified that the required sampling frequency had been met. Corrective action required by the LCO, a reactor shut down was carried out as required. Following a record review and discussions with personnel the inspector had no other questions.

4. Annual Report

The Nine Mile Point 1975 Annual Report, not including the supplement dated March 10, 1976, was reviewed. Included in the facility record review, a check was made of the accuracy of the selected information in the annual report. The implementation of Technical Specification 6.9.1.b requirements was reviewed. Of interest was coverage of forced outages and indications of failed fuel. The inspector discussed the fourth quarter values for fission and activation gases released, reported on Table 1A, of the Effluent and Waste Disposal Semiannual Report vs. those in Table 1B. There were no other questions at this time.

