

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

RFB

NOV 21 1975

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

License No. DPR-17
Inspection No. 74-24
Docket No. 50-220

Gentlemen:

This refers to the inspection conducted by Mr. H. Canter of this office on November 5-7, 1975 at the Nine Mile Point 1 Nuclear Power Station, Scriba, New York of activities authorized by NRC License No. DPR-17 and to the discussions of our findings held by Mr. H. Canter with Mr. Lempges and Mr. Perkins of your staff at the conclusion of the inspection, and to subsequent telephone discussions between Mr. H. Canter and Mr. Silliman on November 10 and 11, 1975.

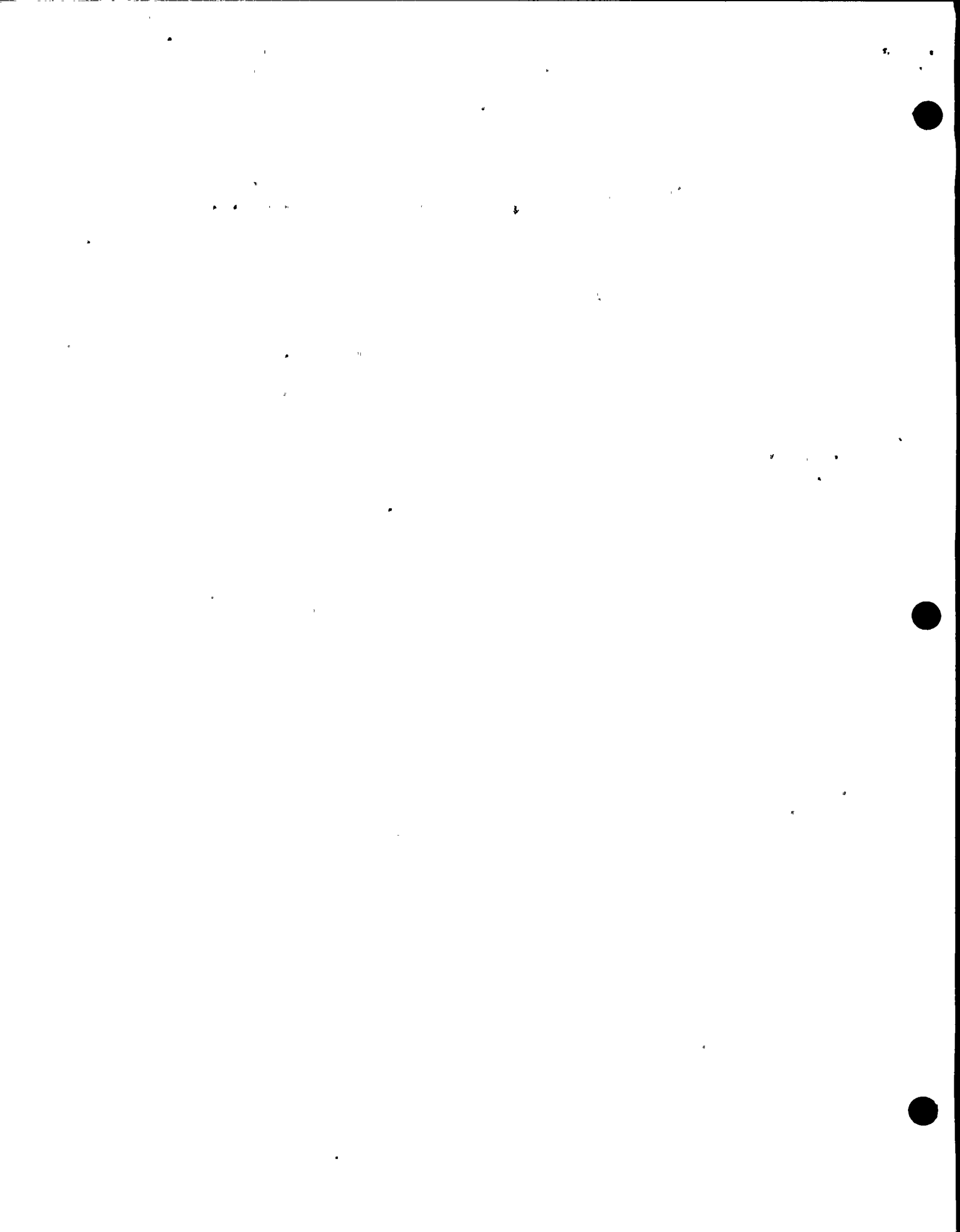
Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations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

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.



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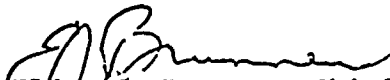


Niagara Mohawk Power Corporation

-2-

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:I Inspection Report 50-220/75-24

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

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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



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

Inspection Report No: 50-220/75-24

Docket No: 50-220

Licensee: Niagara Mohawk Power Corporation

License No: DPR-17

300 Erie Boulevard, West

Priority: _____

Syracuse, New York 13202

Category: C

Location: Nine Mile Point 1, Scriba, New York

Safeguards Group: _____

Type of Licensee: 1850 Mwt, BWR (GE)

Type of Inspection: Routine, Announced

Dates of Inspection: November 5-7, 1975

Dates of Previous Inspection: October 23-24, 1975

Reporting Inspector: H. L. Canter
H. L. Canter, Reactor Inspector

11-17-75
DATE

Accompanying Inspectors: _____

DATE

DATE

DATE

Other Accompanying Personnel: _____

DATE

Reviewed By: E. C. McCabe

11/21/75
DATE

E. C. McCabe, Section Leader, Nuclear Support Section
Reactor Operations and Nuclear Support Branch



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

Inspection Report No: 50-220/75-24

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Licensee: Niagara Mohawk Power Corporation

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300 Erie Boulevard, West

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Reporting Inspector: H. L. Canter
H. L. Canter, Reactor Inspector

11-17-75
DATE

Accompanying Inspectors: _____

DATE

DATE

DATE

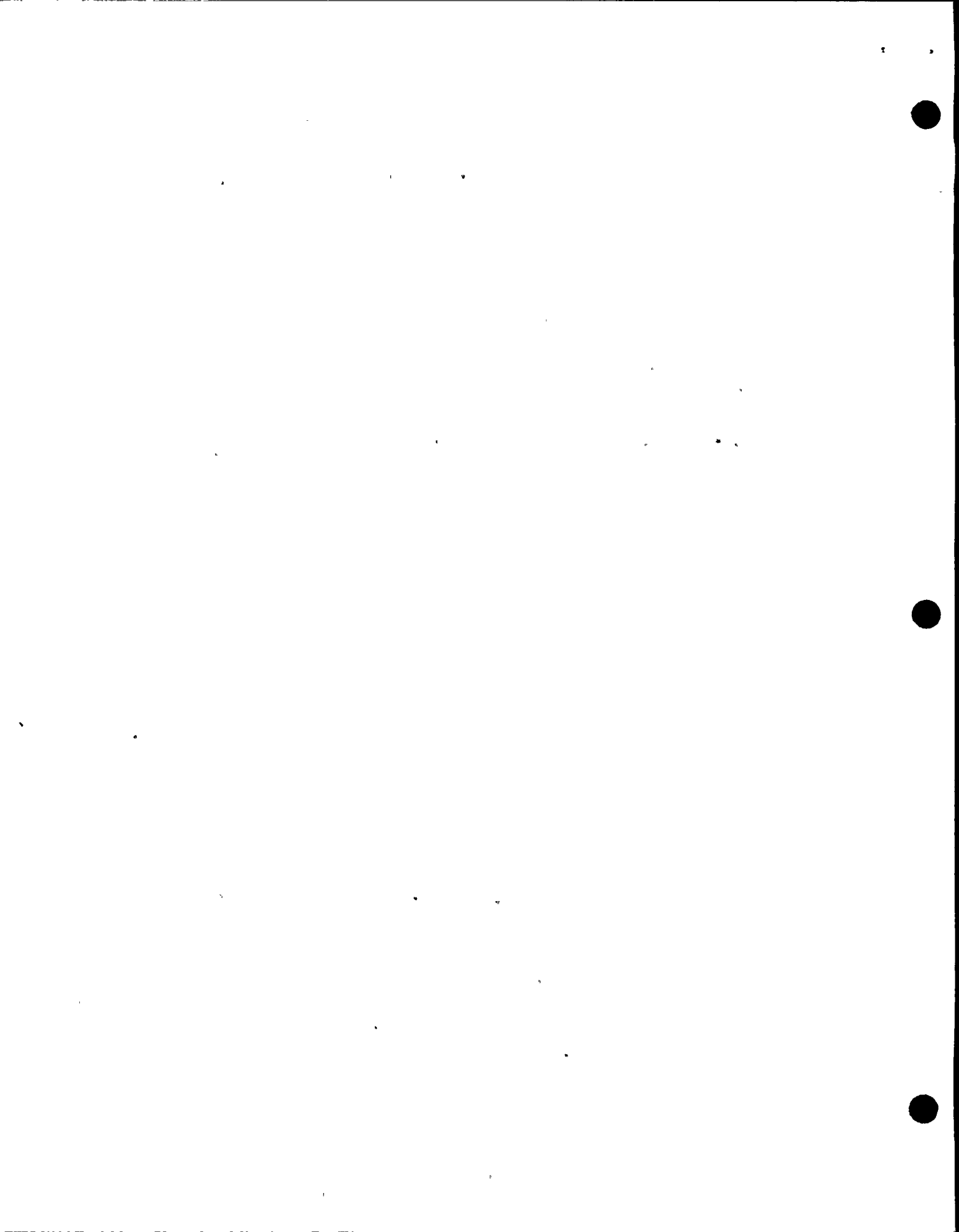
Other Accompanying Personnel: _____

DATE

Reviewed By: E. C. McCabe

11/21/75
DATE

E. C. McCabe, Section Leader, Nuclear Support Section,
Reactor Operations and Nuclear Support Branch



SUMMARY OF FINDINGS

Enforcement Action

None

Other Significant Findings

A. Current Findings

1. Acceptable Items

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

a. Containment Leak Rate Testing

(Details, Paragraphs 4.a, 4.e, 4.f and 4.g)

b. Plant Tour

(Details, Paragraph 6)

2. Unresolved Items

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

None Identified.

3. Followup Items

These are items of inspector's concern which require additional research and will be reviewed in a subsequent report.

a. 75-24-1 - ILRT Results

(Details, Paragraph 4.b)

b. 75-24-2 - Instrument Calibrations and Error Calculations

(Details, Paragraph 4.c)



- c. 75-24-3 - Reference Vessel Tests
(Details, Paragraph 4.d)
- d. 75-24-4 - Type "C" Penalties
(Details, Paragraph 5)
- e. 75-24-5 - Secondary Containment Air Lock Doors
(Details, Paragraph 6)

B. Status of Previously Unresolved Items

- 1. Region I Report 50-220/75-23, Details, Paragraph 2.a
Containment air stabilization criteria is delineated in the ILRT procedure. This item is resolved. (Details, Paragraph 3.a)
- 2. Region I Report 50-220/75-23, Details, Paragraph 3
MSIV testing is resolved. (Details, Paragraph 3.c)

Management Interview

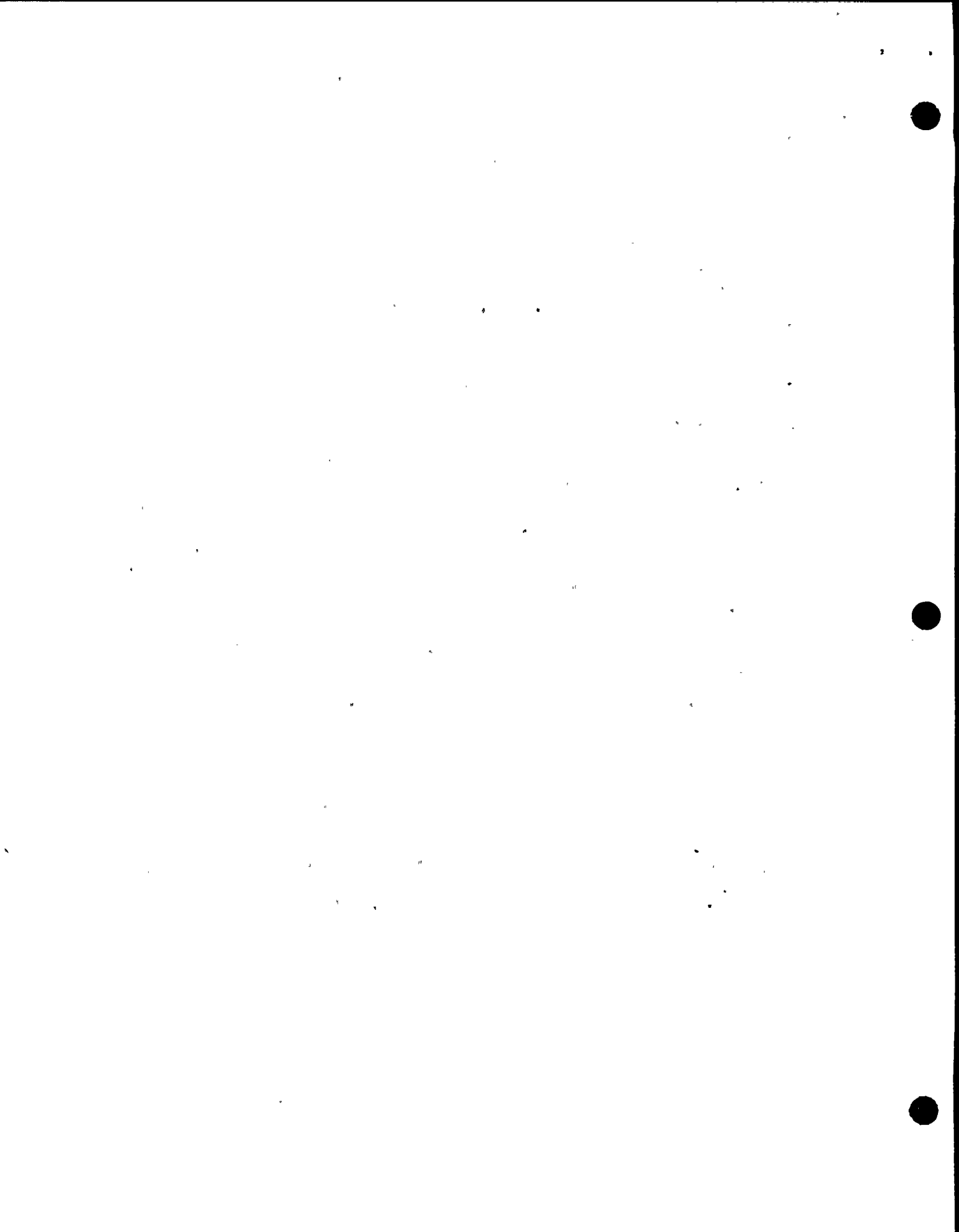
A management interview was held at the site on November 7, 1975.

Persons Present

Mr. T. Lempges, Site General Superintendent
Mr. T. Perkins, Station Superintendent

Items Discussed

- A. Purpose of Inspection. (Details, Paragraph 2)
- B. Previously Unresolved Items. (Details, Paragraph 3)
- C. Containment Leak Rate Test Witnessing. (Details, Paragraph 4)
- D. Type "C" Penalties. (Details, Paragraph 5)
- E. Plant Tour. (Details, Paragraph 6)



DETAILS

1. Persons Contacted

Mr. R. Coles, Test Supervisor
Mr. J. Earls, Technician
Mr. T. Lempges, Site General Superintendent
Mr. P. Momeau, Test Supervisor
Mr. T. Perkins, Station Superintendent
Mr. G. Shelling, Test Supervisor
Mr. M. Silliman, Site Results Supervisor

2. Purpose of Inspection

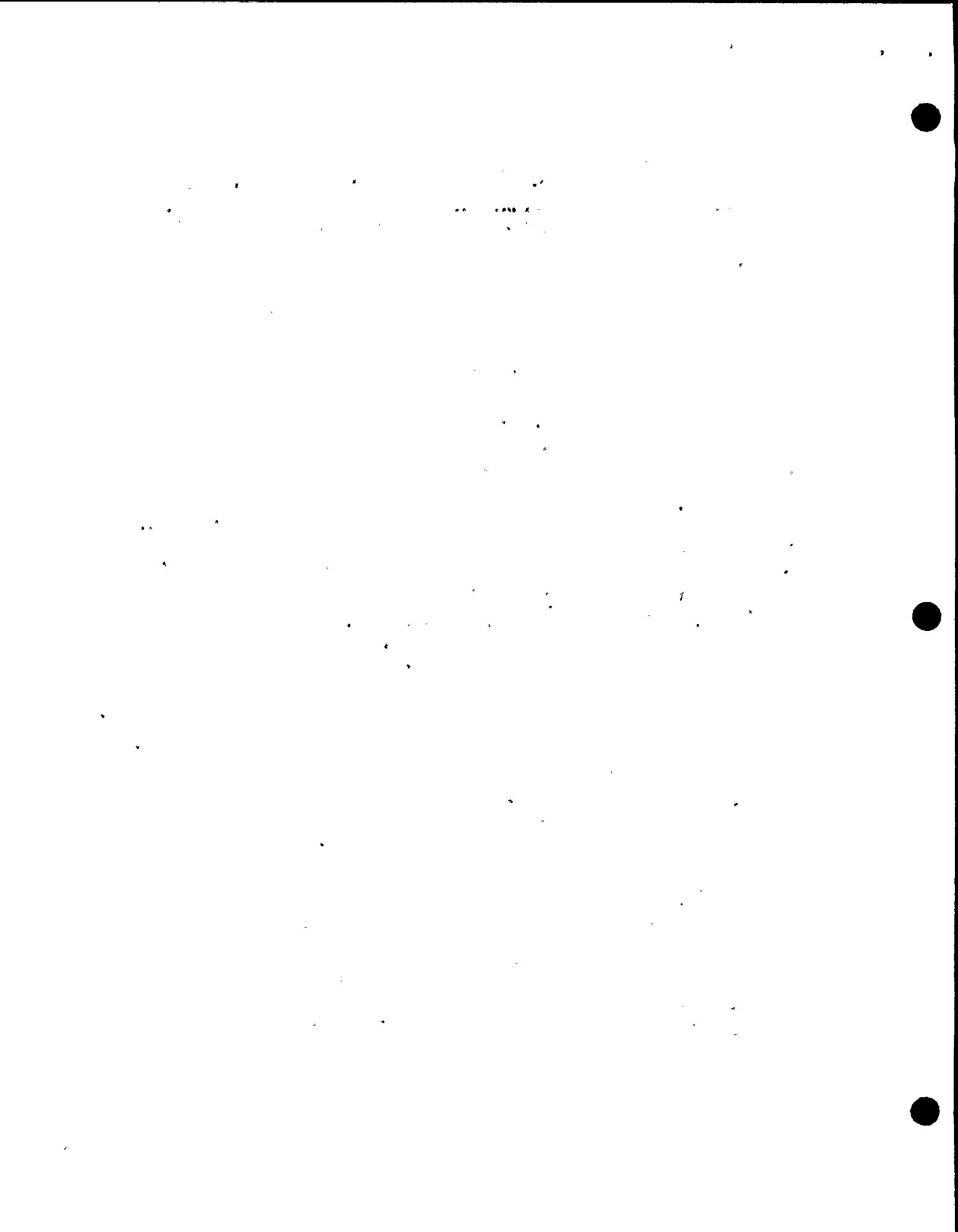
The inspector stated the purpose was to establish through observations, record review, and independent calculations that the testing was to be conducted in accordance with approved acceptable procedures in accordance with 10 CFR 50, Appendix J. Also, to independently verify the acceptability of test results, and to evaluate the performance of the licensee personnel involved in the test performance. Finally, the inspector was to resolve previously unresolved items.

At the conclusion of the inspection, the licensee had begun to pressurize the containment, so that few independent calculations were possible, but the preparations for the test were witnessed. Comments on the test witnessing follow in Detail Paragraphs 4, 5 and 6.

3. Previously Unresolved Items

a. Region I Report 50-220/75-23, Details, Paragraph 2.a

Revision 2 to the ILRT procedure (NI-ISP-IC-23) was revised in step 5.3.14 and data sheet 5.3.14.a to read, "The 24 hour test run shall start after a minimum of 4 hours stabilization and when the change in containment average temperature does not exceed 1°F/hr."



The inspector stated that the change in average temperature should be averaged over approximately the last two hours of the stabilization period. This change was added to the procedure (SORC approved) before the end of this inspection.

This item is resolved.

b. Region I Report 50-220/75-23, Details, Paragraph 3

A bypass around the flow meter associated with MSIV Type "C" tests was removed and the test was then run.

This satisfies the item in the reference report so that this item is considered resolved.

4. Containment Leak Rate Test Witnessing

The inspector arrived on site to witness the ILRT on Wednesday, November 5, 1975. Delays were incurred in starting the test due to the massive amount of blocking necessary to perform the test. Also, the drywell and torus reference vessel leakage tests were incorrectly run the first time due to the data takers taking the wrong data. The reference vessel leakage tests take about 6 hours to perform and calculate the data so that at least that amount of time was lost in the rerun. The containment pressurization began at 0040 on Friday, November 7, 1975 with the containment pressure at approximately 16 psig at the conclusion of the inspection at noon on November 7, 1975.

The following are the inspectors observations on the preparations for the licensee's ILRT.

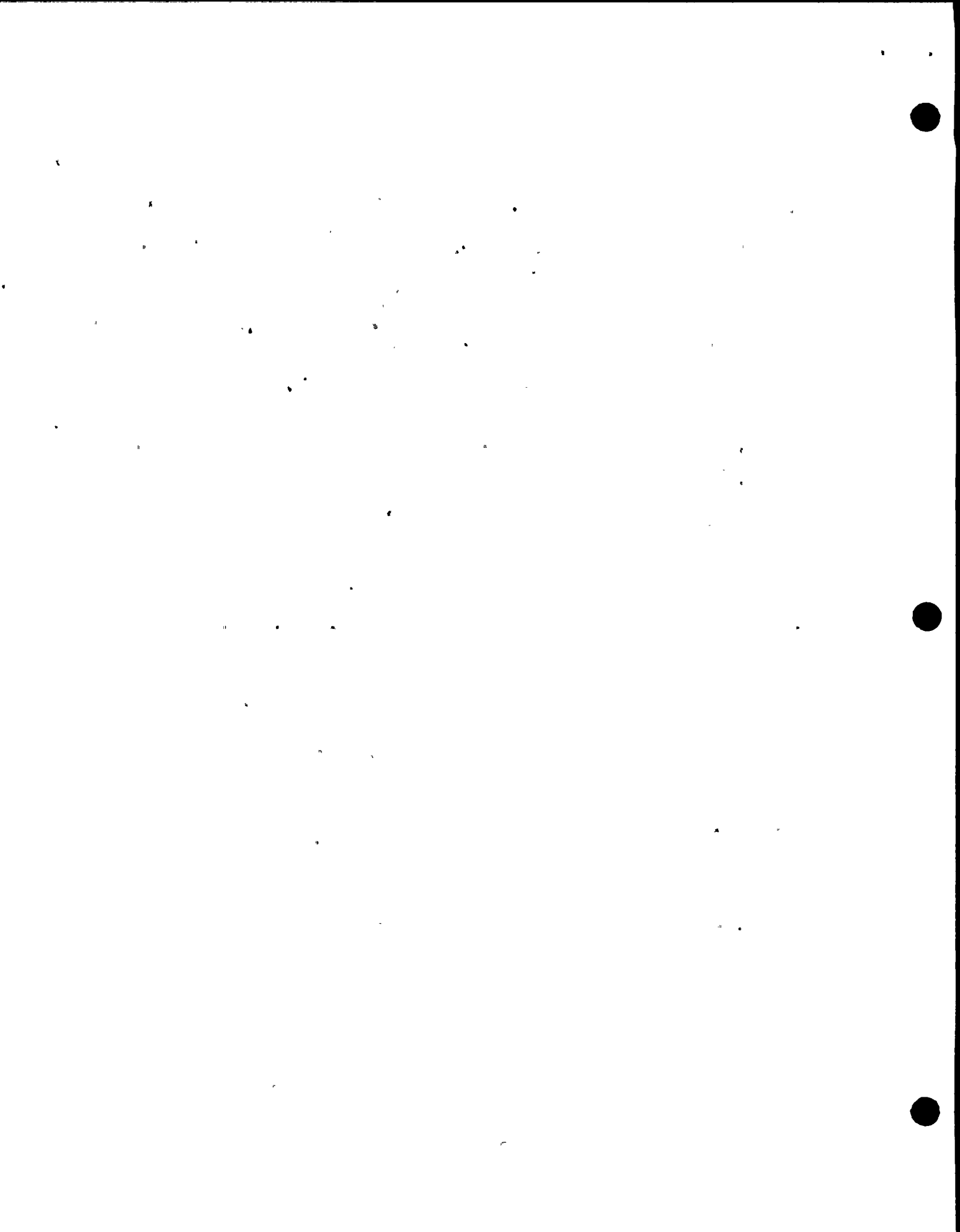
- a. The licensee is to perform a reduced pressure test at 22 psig in accordance with Technical Specification 4.3.3, dated December 26, 1974 which states that three integrated leak rate tests shall be performed at approximately equal intervals during each 10 year service period. The last ILRT was completed May 24, 1972. In addition, the licensee has submitted a proposed change to Technical Specifications dated October 24, 1975 which deals directly with the ILRT and 10 CFR 50, Appendix J. This change requests that table 3.2.7 and Sections 3.2.3, 4.3.3, 3.3.4, and 4.3.4 of the Technical Specifications be amended to comply with Appendix J. The licensee planned to perform this ILRT in accordance with the proposed



change without violating the current Technical Specifications. The proposed change gives the licensee's list of valves classified as non-testable for containment leakage in Tables 3.2.7 and 3.3.4 and also lists valves which will be made testable by the end of the 1977 refueling outage in Table 3.3.4. A Safety Evaluation is included as Attachment B to the proposed change. This change is currently under review by NRR for incorporation into the facility license. The inspector has no further questions on this item at this time.

- b. The licensee was furnished a copy of the draft standard on Reactor Containment Leakage Rate Testing, ANS-N-274 Working Group 56.8. Sections of the present ANSI-N45.4-1972 Standard on Containment Leakage Testing were revised to conform with the requirements of 10 CFR 50, Appendix J and are included in the draft standard. The licensee is using the Draft Standard for all calculations, and has incorporated those formulae into a total time, reference vessel and least squares fit scheme. The results of the test will be reviewed such that this item will be followed up at a later date.
- c. The inspector was unable to verify calibration, traceability and repeatability of the various instruments used in this test. The inspector also attempted to verify error calculations but was unable to do so because the licensee was gathering this information together by the end of this inspection. The licensee was informed that this item will be followed up at a subsequent inspection.
- d. The inspector was able to independently verify the results of the Drywell and Torus Reference Vessel Tests. The Drywell Leakage was 1.072% and the Torus Leakage was -0.0874%. The inspector noted that step 3.6 in the ILRT procedure states that this leakage is to be about zero prior to test and step 3.6.20 states that these values will be applied to the ILRT results.

ANSI-N-45.4-1972, Section 7.2 states that the Reference Vessel Tests should be performed prior to and after the ILRT. A subsequent phone call was made to the licensee on 11-10-75 in which the licensee committed to performing this Reference Vessel Test in accordance with the ANSI Document. This item will be followed up during a subsequent inspection.

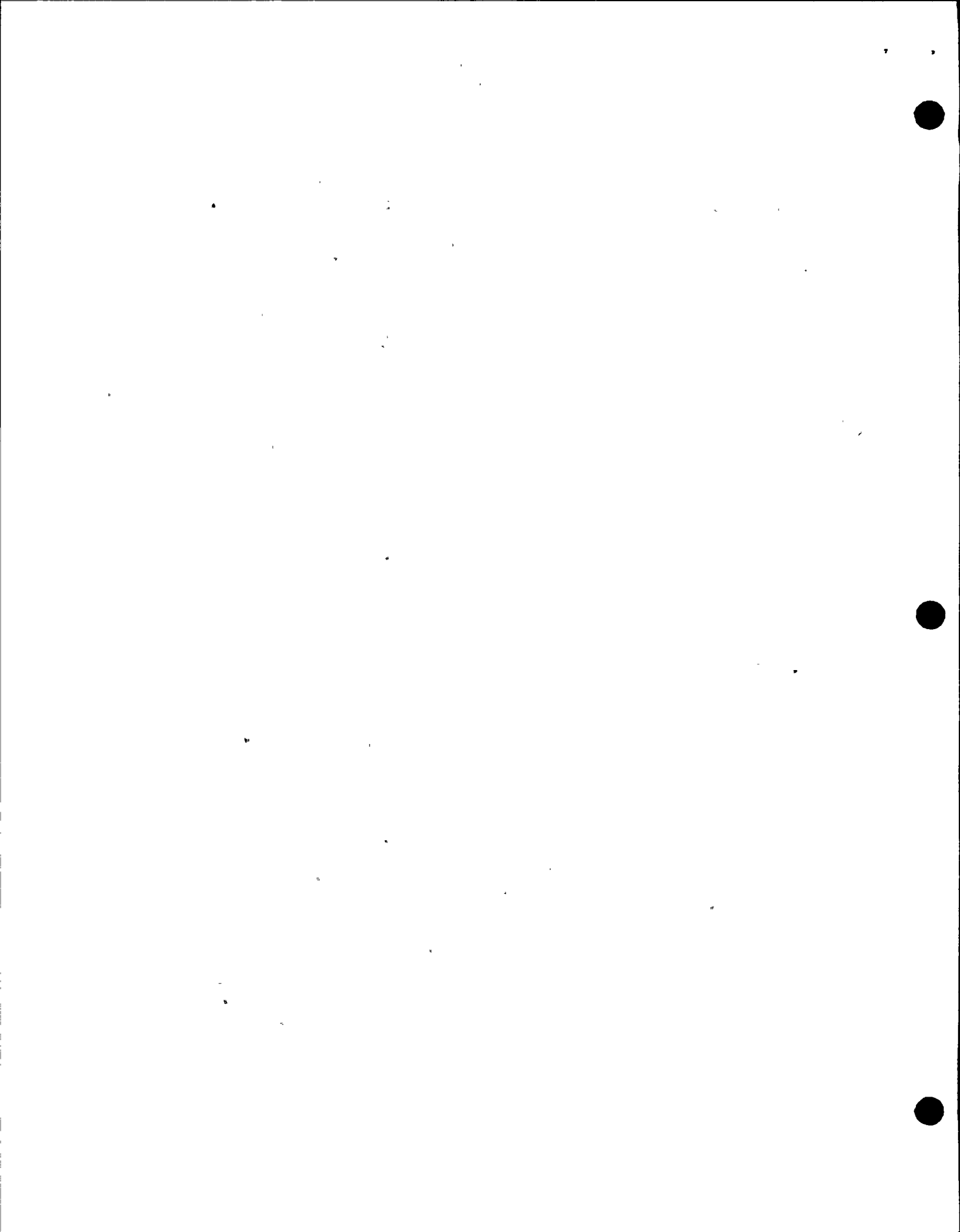


- e. Two sources of pressure which may effect the ILRT results were identified, the N₂ - TIP supply which will be metered and the CRD cooling water input. The cooling water is metered into the system through FE-RD14. This data will be correlated with the clean up system water removal as monitored through FE-IJ50 upstream of penetration X-9. The licensee will also be monitoring reactor and torus water levels and water pumped out of the equipment drain and floor drain sumps.

The inspector had no further questions on this item.

- f. The inspector verified by direct observation that the following valves were lined up in accordance with the ILRT procedure. The verification was done by Control Board Observations, Plant Tours, Yellow Blocking Tag Log Reviews, ILRT Log Reviews from 11-5-75 to 11-7-75, and Piping and Instrument Diagram (P&ID) Reviews.

<u>Penetration Number</u>	<u>Valve Check Off</u>
X9 Reactor Clean Up System (P&ID 009)	a) Open IV 33-04 b) Open IV 33-02
X8 Shutdown Cooling (P&ID 018)	a) Close IV 38-01; IV 38-02 b) Close BV 38-03; BV 38-04; BV 38-05 c) Vent Reactor Water Systems Outboard of IV 38-02 (SC301 and SC302 Open)
X18 Drywell Air Vent and Purge (P&ID 014)	a) Close IV 201-10; IV 201-09 b) Check that Outboard of IV 201-09 is Open to Atmosphere
XS342 Cont. Spray 111 Pump Loop (P&ID 012)	a) Open IV 80-01 b) Close All Test and Drain Connections of No. 111 Pump Loop (Not Done Yet)

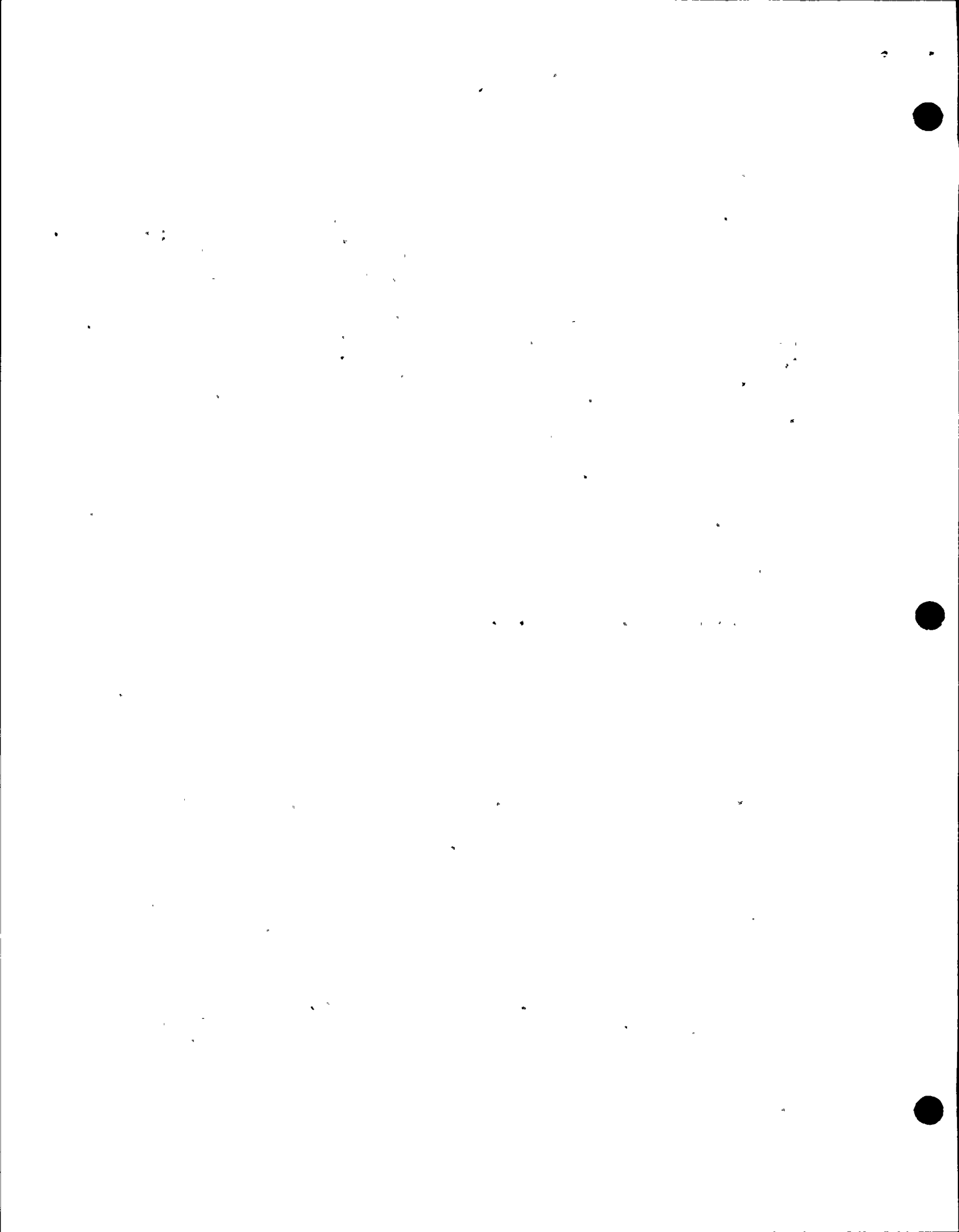


<u>Penetration Number</u>	<u>Valve Check Off</u>
X14 Core Spray (P&ID 007)	a) Close IV 40-10; IV 40-11 b) Open IV 40-12 c) Close MOV 93-51
XS335 Core Spray (P&ID 007)	a) Close IV 40-06
X174 CRDS Exhaust (P&ID 016)	a) Open 301-114 b) Open 301-106 c) Close all test and drain connections inboard of 301-106 and between 301-106 and FE-RD 37 (301-118 and 301-119 will be closed prior to test. No connections appeared between 301-106 and FE-RD 37)
X5B Emergency Condenser (P&ID 017)	a) Close IV 39-05 b) Close all test and drain connections IB and OB of IV39-05
X2B Main Steam (P&ID 002)	a) Close IV 01-02 b) Close IV 01-04 c) Vent outboard of IV 01-04 d) Close IV 01-06 e) Close all vent and drain connections IB of IV 01-04 f) Vent OB of IV 01-02 to Drywell

The inspector had no further questions on this item.

- g. Subsequent telephone calls on 11-10-75 and 11-11-75 indicated that leaks on 2 of the 4 Containment Spray Heat Exchangers from the higher pressure shell inside to the Raw Water tube side had caused delays in the ILRT. The licensee stated that some tubes were plugged in the two heat exchangers, that the reference vessel tests were repeated that the stabilization period was satisfied, and that the test was recommenced about 0645 on 11-11-75. The containment was not depressurized during the approximate 3 day hold on the test. The licensee expected to complete the test during the afternoon of 11-12-75.

The inspector has no further questions on this item at this time.



5. Type "C" Penalties

The licensee intends to take a Type "C" Penalty on certain valves in the performance of this ILRT. The Penalty consists of adding the local leak rate values obtained from Type "C" testing for these valves to the total leak rate obtained in the Type "A" Test.

In each case below, the penalty is necessitated by a condition whereby the valve seat is sealed with water which precludes containment pressure from contacting the seat as it would during a D.B.A. Following are the valve designations upon which the penalties will be assessed and the reasons for the penalties being assessed.

a. MSIV's

The system is full of water to maintain temperature on the reactor head flange.

b. Shutdown Cooling IV-38-02

This isolation valve is the outboard containment isolation valve in penetration X-8. Water is being maintained to this valve so the system can be available for use to remove residual heat. If the inboard valve (IV-38-01) were vented then the licensee could not enter containment quickly enough to line up the system. IV-38-01 is hydraulically connected to a recirculation loop.

c. O₂ Sampling

Valve 201.2-70, in the return from the O₂ sampling system to the torus does not seat properly. This valve (1 of 2 series check valves) will be repaired and a penalty taken after it is repaired and tested.

The above items will be followed up during the IE review of the test results.

6. Plant Tour

The inspector noted with concern the lack of sufficient readable signs on radiation barriers which delineate requirements for entry into that area. The licensee's response to this area of concern was to upgrade the signs throughout the plant as verified by subsequent tours of accessible areas. The inspector had no further questions on this item.



The inspector noticed an interior secondary containment air lock door at the 261 level would not close without help from persons passing through. Consequently, since secondary containment was not required the inspector noted seven personnel violate the air lock interlock system to pass through the doors. The inspector voiced concern that the door did not work properly and that persons passing through the door did not expend the extra effort required to latch the door properly. The licensee's response was that they were aware of the door problem in the past and that they will attempt further adjustments prior to setting secondary containment isolation in the future. This item will be routinely followed up in subsequent inspections.

The inspector noted trash cans at the 261 level and the refueling floor were overladen with yellow rubber booties. The licensee informed appropriate Health Physics personnel to empty the receptacles. The inspector had no further questions on this item.



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

DEC 9 1975

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

License No. DPR-63
Inspection No. 75-23
Docket No. 50-220

Reference your letter dated November 28, 1975
In response to our letter dated November 7, 1975

Gentlemen:

Thank you for informing us of the corrective and preventive actions you documented in response to our correspondence. These actions will be examined during a subsequent inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,



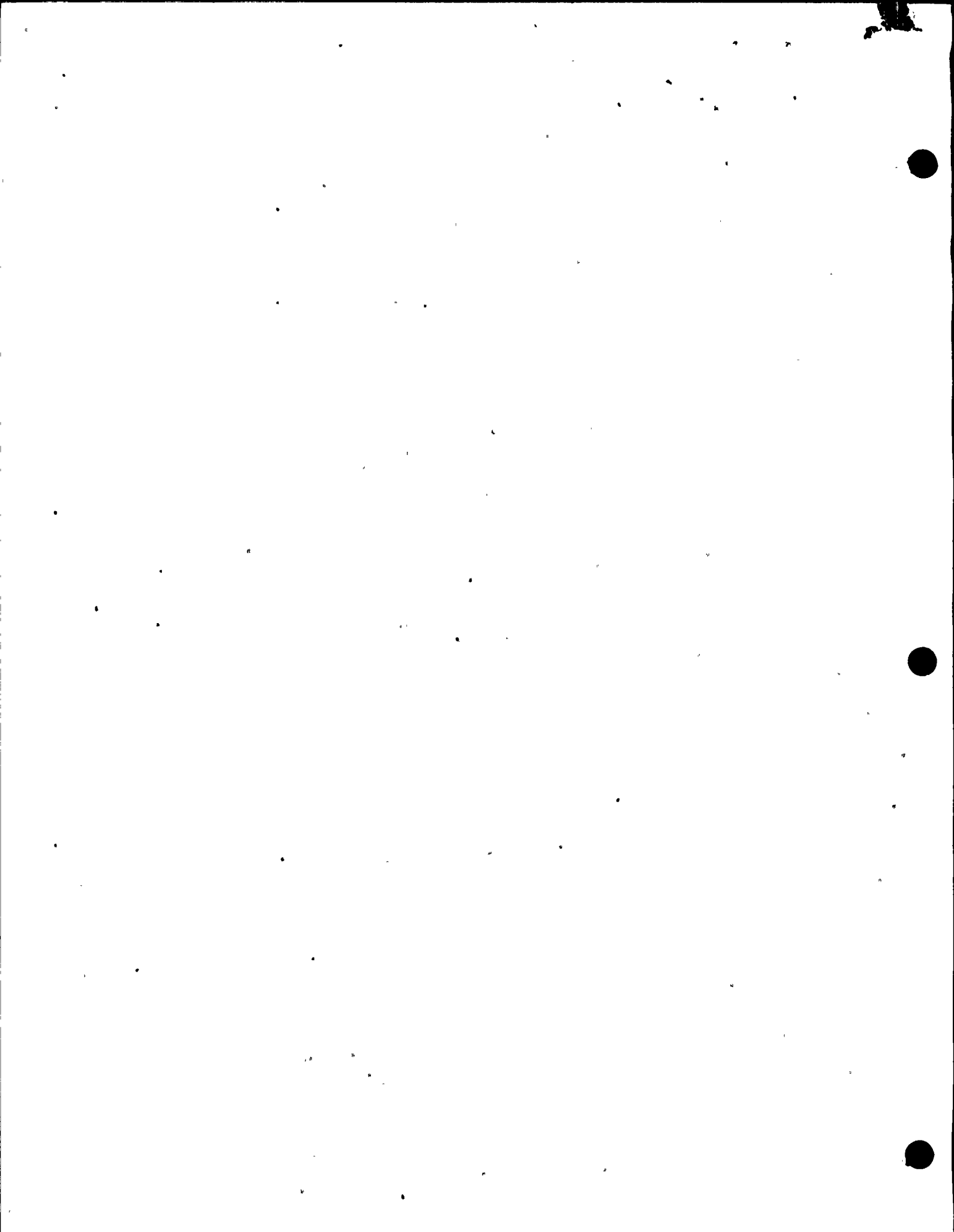
Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch

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

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NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

300 ERIE BOULEVARD, WEST
SYRACUSE, N. Y. 13202

November 28, 1975

Mr. Eldon J. Brunner, Chief
Reactor Operations Branch
United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pa. 19406

RE: Docket No. 50-220
Inspection Report 75-23

Dear Mr. Brunner:

Referring to Inspection Report Number 75-23, conducted by Mr. T. Rebelowski of your office on October 24, 1975 at Nine Mile Point Unit #1, we have concluded that the report may be placed in the NRC's Public Document Room without changes.

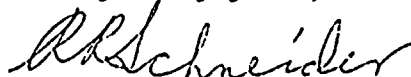
Pursuant to 10 CFR Part 2, Section 2.201, the following information concerning the alleged deficiency is submitted:

"Contrary to the Technical Specification 4.3.3.f, the limits on total leakage rates measured during the local leak testing were not evaluated."

RESPONSE:

A calculation was made on October 27, 1975 with the resulting value of type "B" penetration leakage of 4% of allowable limits of .60 Ia. This information is now a part of the 1974 test results: To prevent further occurrences, a change in testing methodology has been completed. This change will allow a flow test rather than a pressure test and eliminate test instrument leakage. The testing of these penetrations was undertaken this year with no indicated leakage. Full compliance has been achieved.

Very truly yours,



R.R. Schneider
Vice President - Electric Operations

5B

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

REACTOR FACILITIES BRANCH

FILE COPY

NOV 7 1975

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

License No. DPR-63
Inspection No. 75-23
Docket No. 50-220

Gentlemen:

This refers to the inspection conducted by Mr. T. Rebelowski of this office on October 24, 1975 at Nine Mile Point 1, Scribe, New York of activities authorized by NRC License No. DPR-63 and to the discussions of our findings held by Mr. T. Rebelowski with Mr. T. Perkins and Mr. M. Silliman of your staff at the conclusion of the inspection, and to a subsequent telephone discussion between Mr. Silliman and Mr. T. Rebelowski on October 30, 1975.

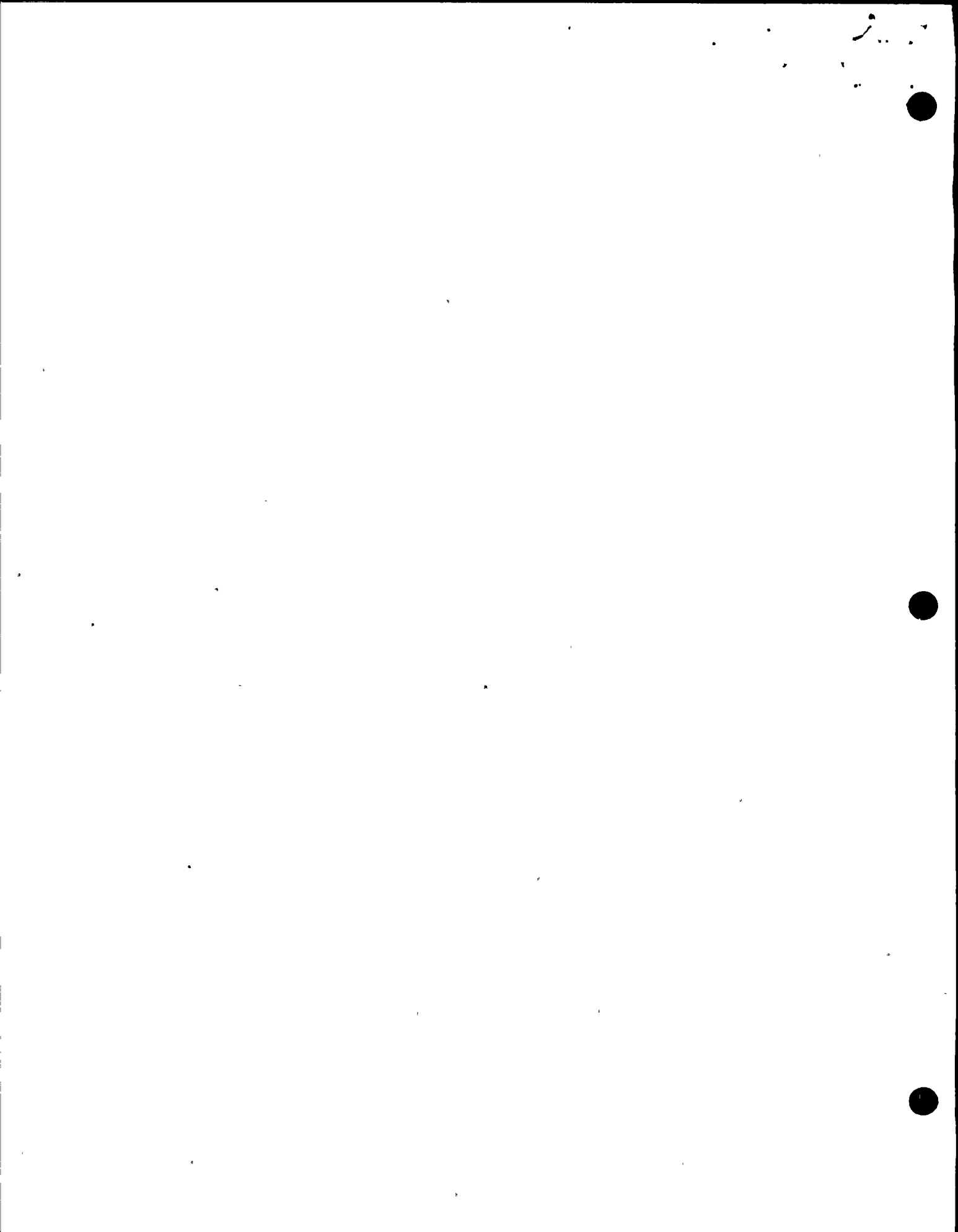
Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations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

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 enclosures 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



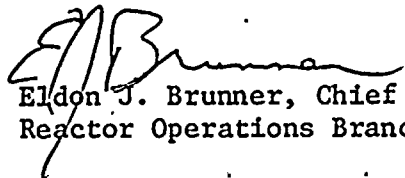
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disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained 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 Branch

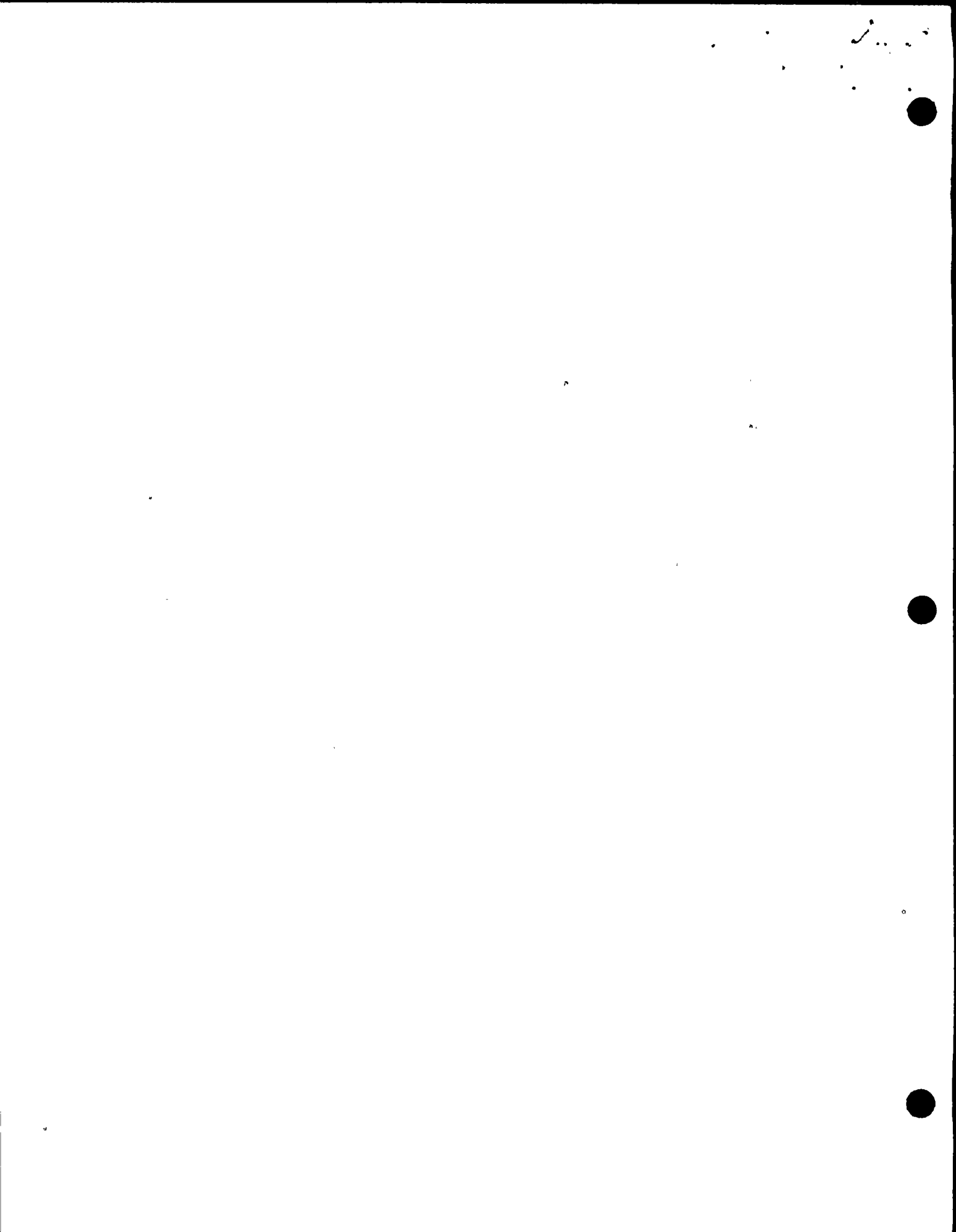
Enclosures:

1. Appendix A, Notice of Violation
2. Region I Inspection Report No. 50-220/75-23

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:

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License No. DPR-17

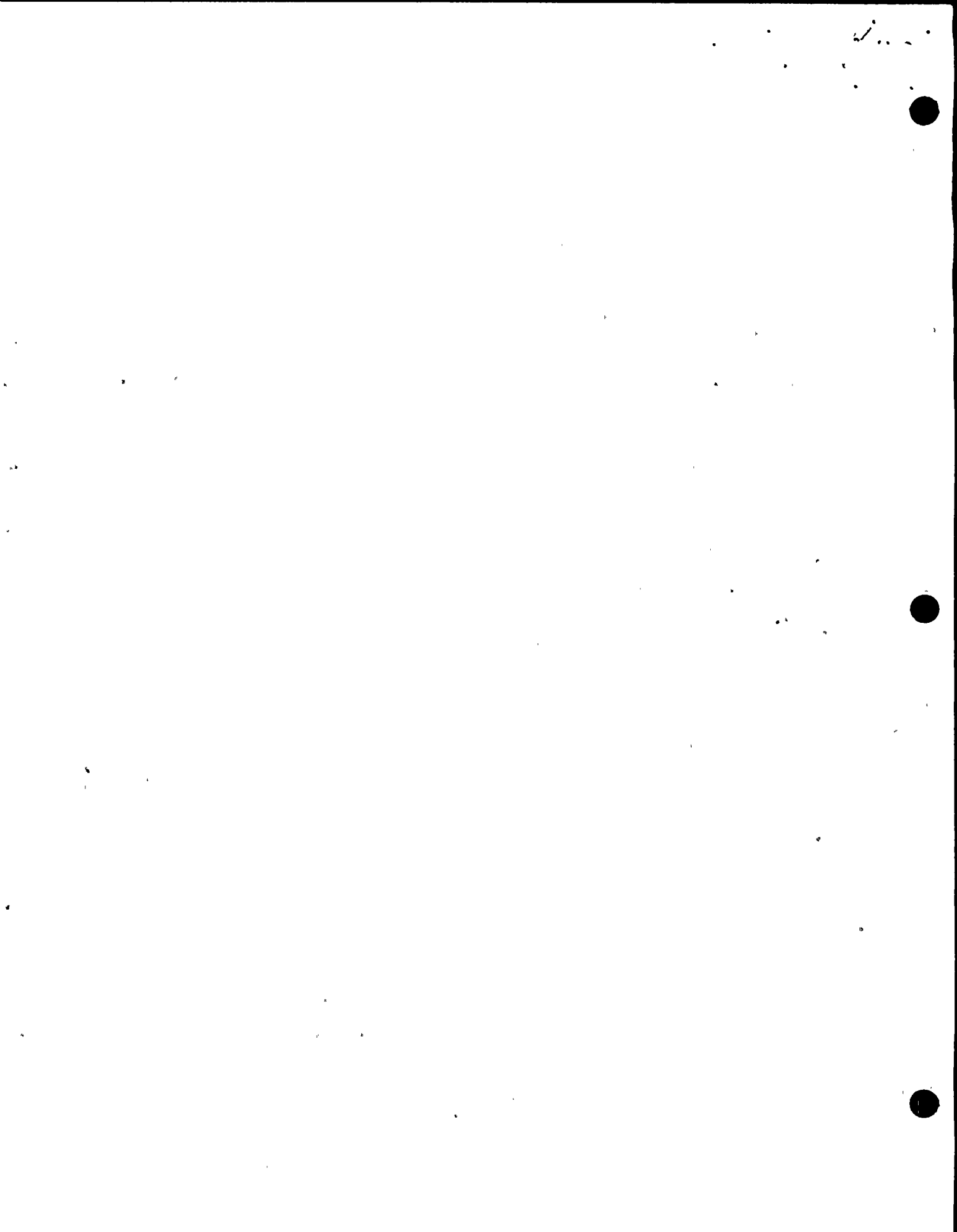
APPENDIX A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on October 24, 1975, it appears that one of your activities was not in full compliance with the conditions of your license as indicated below:

Contrary to the Technical Specification 4.3.3.f, the limits on total leakage rates measured during the local leak testing were not evaluated.

This item is a deficiency.



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

IE Inspection Report No: 50-220/75-23

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 I, Oswego, New York

Type of Licensee: 1850 MWr, BWR (GE)

Type of Inspection: Routine, Announced

Dates of Inspection: October 24, 1975

Dates of Previous Inspection: September 29 - October 2, 1975

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

11/5/75
DATE

Accompanying Inspectors: _____

DATE

DATE

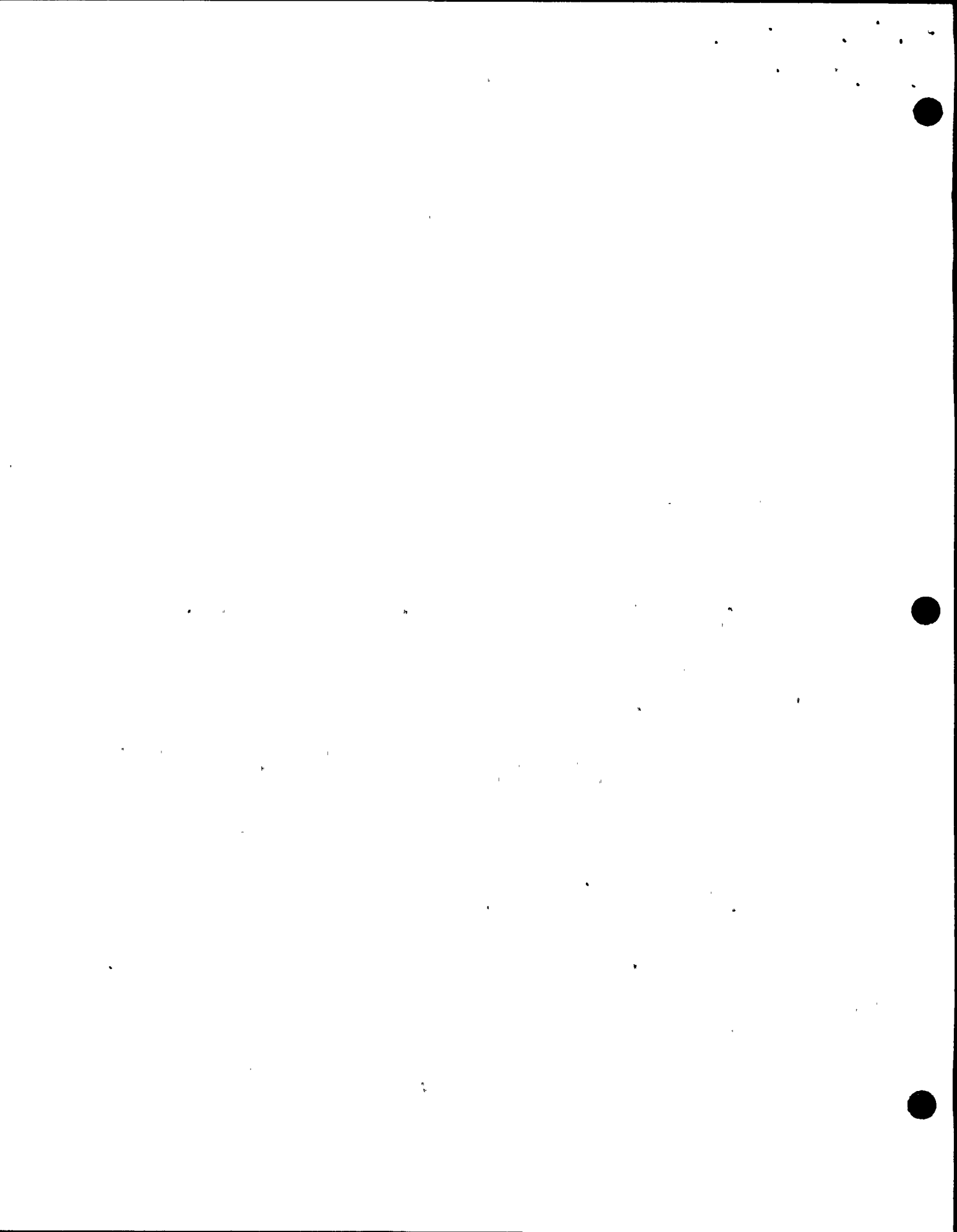
DATE

Other Accompanying Personnel: None

DATE

Reviewed By: *E. C. McCabe, Jr*
E. C. McCabe, Senior Reactor Inspector
Nuclear Support Section, Reactor Operations Branch

11/5/75
DATE



SUMMARY OF FINDINGS

Enforcement Action

A. Deficiencies

Contrary to Technical Specification 4.3.3.f the limits on total leakage rates measured during local leak rate testing were not evaluated. (Detail 4)

Other Significant Findings

A. Current Findings

1. Acceptable Items

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

a. Integrated Leak Rate Test Procedure (Detail 2c, 2d)

2. Unresolved Items

These are items for which additional information is required in order to determine if an item is acceptable, a deviation or an item of Noncompliance.

a. Integrated Leak Rate Test Procedure (Detail 2a,2b)

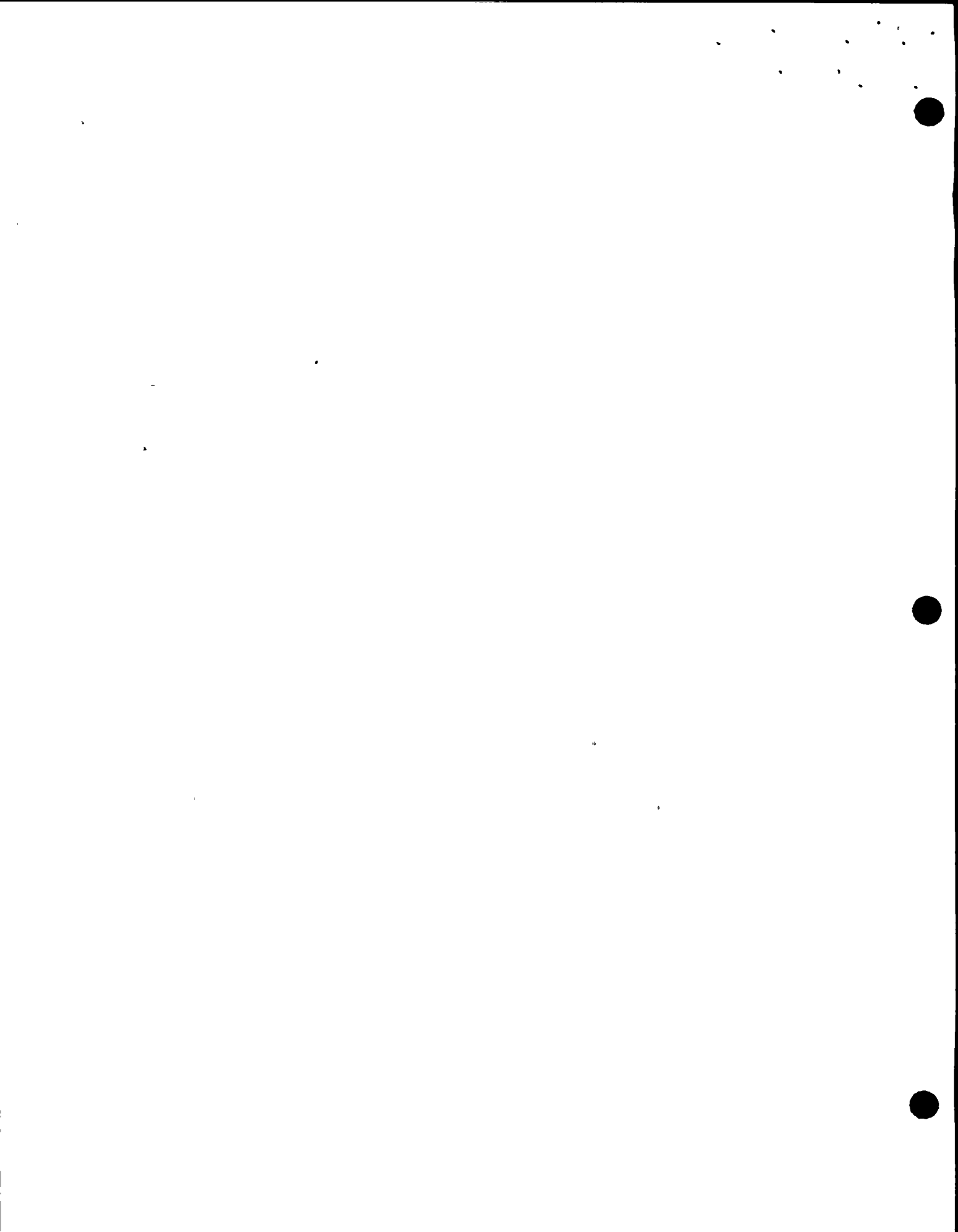
b. Main Steam Isolation Valve Testing (Detail 3)

3. Status of Previously Identified Unresolved Items Report 50-220/75-21 (Detail 3b(4))

The evaluation of leakage found during penetration testing has been changed from the status of unresolved to an Item of Noncompliance. (Detail 4)

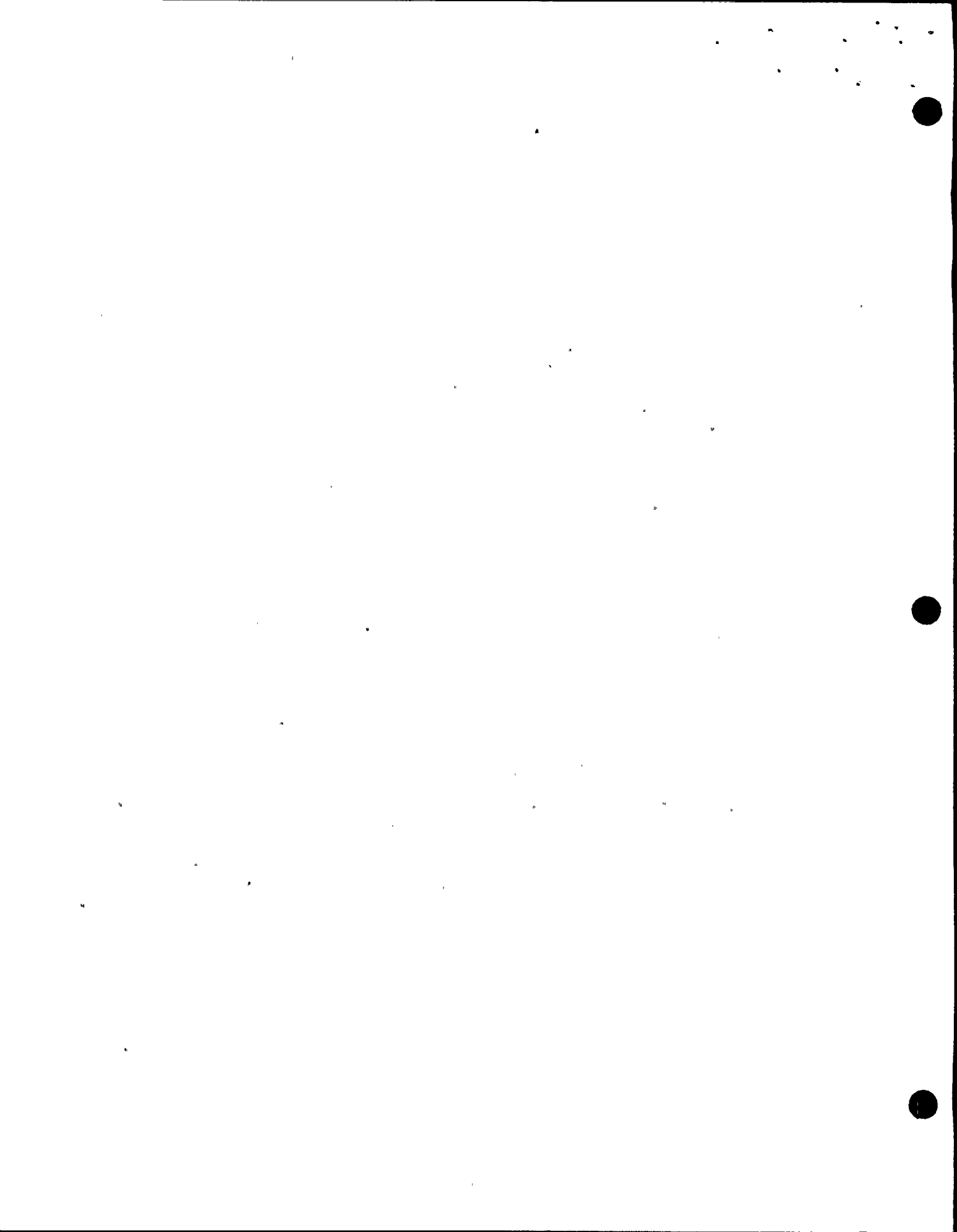
Management Interview

A management interview was conducted at the site on October 24, 1975 with Mr. T. Perkins, Station Superintendent and Mr. M. Silliman, Results Supervisor.



Summary of Items discussed:

1. Integrated Leak Rate Test Procedure . (Detail 2)
2. Main Steam Isolation Valve Check (Detail 3)
3. Evaluation of Penetration Test Results (Detail 4)



DETAILS

1. Persons Contacted

Mr. M. Boyle, I.C. Technician
Mr. P. Castonguay, Q. A. Nine Mile
Mr. T. Lempges, Site General Superintendent
Mr. T. Perkins, Station Superintendent
Mr. M. Silliman, Site Results Supervisor
Mr. B. Taylor, Assistant Supervisor, I.&C.

2. Integrated Leakage Rate Test

The inspector reviewed 10 CFR 50, Appendix J, ANSI N45.4 Leak Rate Testing of Containment Structures for Nuclear Reactors (March 16, 1972) and licensee Surveillance Test NI ISP 1C23 Integrated Leak Rate Test of Primary Containment. (ILRT)

The licensee had previously performed an ILRT on May 24, 1972 to comply with Technical Specification 4.3.3 and 10 CFR 50 Appendix J, which states that three ILRTs shall be performed at approximately equal intervals during each 10 year service period. The licensee intends to perform an ILRT the week of November 1, 1975.

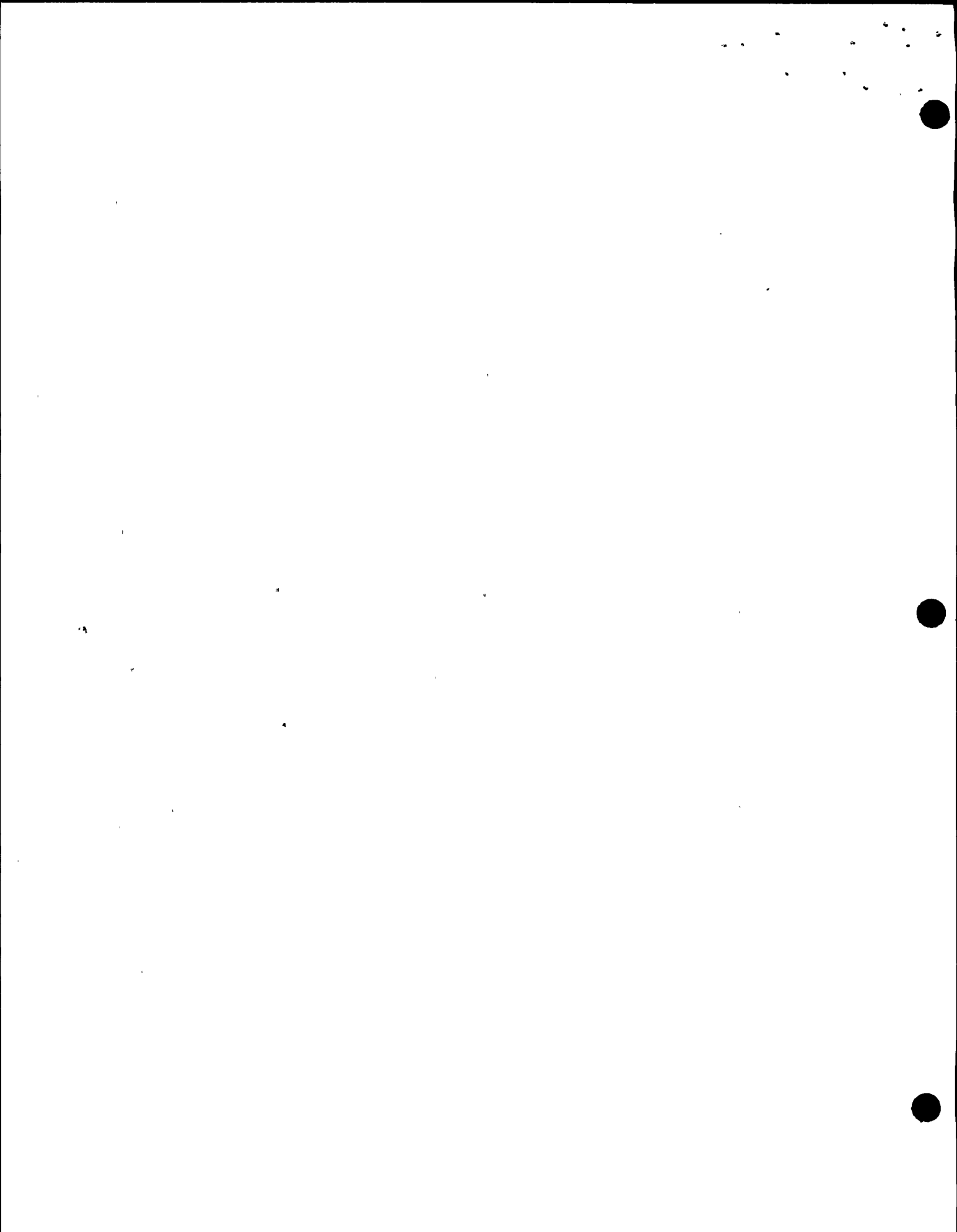
The inspectors review identified several areas of concern.

a. Temperature Stabilization

Inspectors Comment: The ILRT procedure did not indicate the containment air temperature stabilization criteria.

Licensee Comment: The procedure will be revised to indicate a temperature stabilization criteria. Presently, the licensee considers that the calculations would take into account changes in containment temperature. The criteria proposed to "that a rate of change of average temperature is less than 1.0°F/hour averaged over the last two hours of the stabilization period of approximately four hours.

This item remains Unresolved pending review of test results' indicating licensee's adherence to appropriate temperature stabilization criteria.



b. ILRT Criteria

Inspectors Comments: The ILRT test criteria do not include instrumentation or confidence limits. Discussion with the licensee included the Regulatory position that if a plot defined by a least squares fit of the data, including instrument error, falls below the line represented as $0.75L_a$, and if the upper confidence line falls below L_a , the results are acceptable.

Licensee Comment: The licensee has agreed to modify acceptance criteria to the Regulatory position.

This item remains Unresolved pending review of the tests results.

c. Resistance Temperature Detectors

Inspectors Comment: The inspector requested status of RTD calibrations to be used in conjunction with data accumulation during ILRT.

Licensee Comment: The problem of removal of RTDs that have contamination levels which would prevent off-site calibration exists on a number of RTDs in the drywell area. The certified manufacturer's curves of resistance vs temperature for the RTDs are available. A comparison at one point between the RTD and a calibrated thermometer traceable to NBS will be performed.

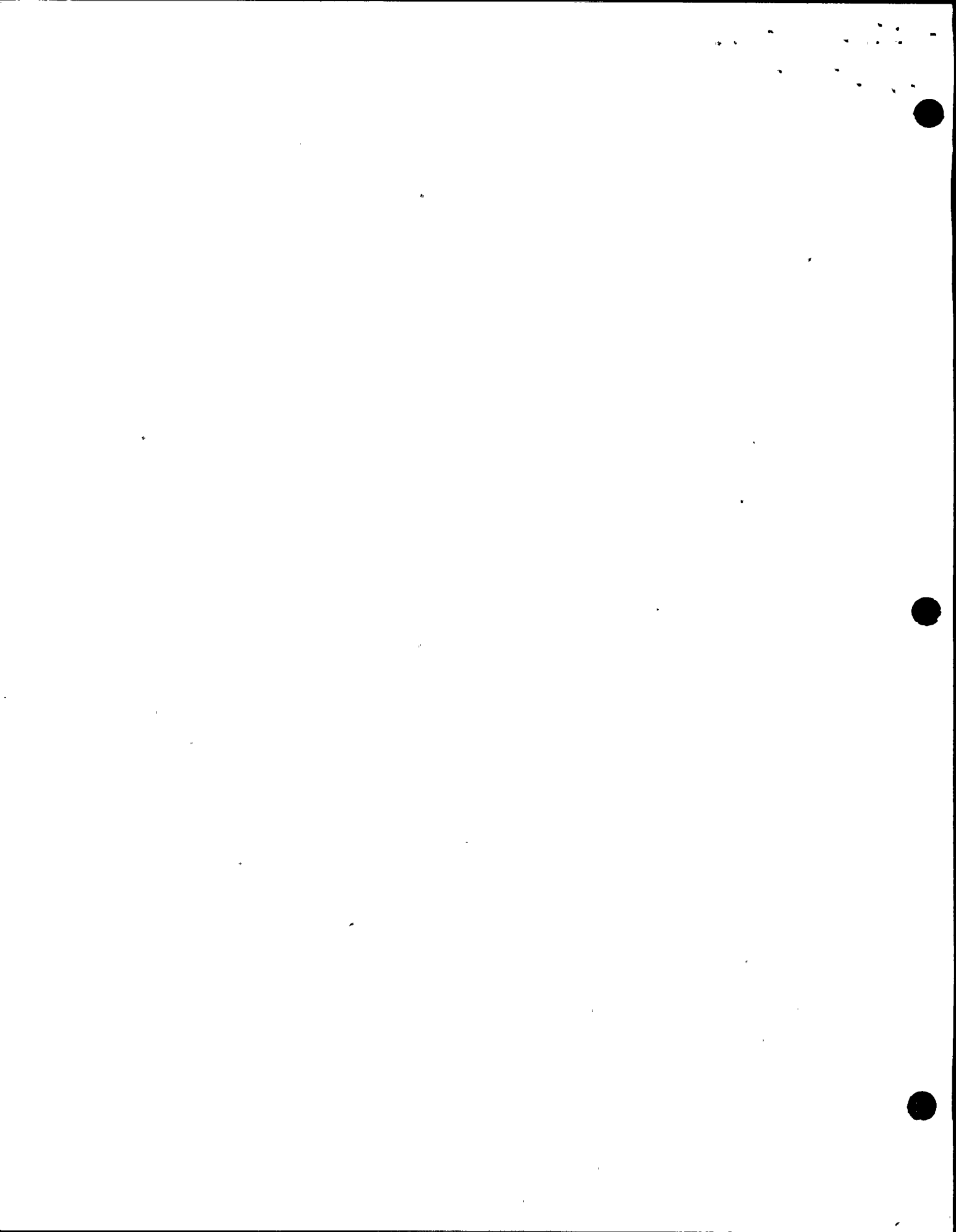
The inspector had no further questions on this item.

d. Additional Areas

The inspector's review included discussion on Peak Pressure, Pre-Inspection of Containment for indications of degradation, valve lineup including vent paths, and adjustments and preparations for testing. No areas of concern were identified.

3. Main Steam Isolation Valves Testing . (MSIV)

The licensee has encountered difficulties in the adjustment of the MSIV's prior to performing "C" type tests. Upon completion of the adjustments to MSIV 121 and MSIV 122 a gross leak test was performed that included MSIV 121, 122 and 12.



The test was performed by procedure NI ISP-IC25-1. The inspector verified vent paths, stabilization criteria, instrument gas flow meter and pressure indicator calibrations.

The result of the maintenance check gross leakage test was approximately 13 cu ft per hour corrected to 22 psig.

The inspector noted that the large volume fill line was not included in the flow check. The licensee stated that the test stand would be modified prior to performance of "C" type testing. This item remains unresolved and will be reviewed at a subsequent inspection.

4. Previously Unresolved Items

Reference: IE Region I Inspection Report 50-220/75-21. Detail 3b(4).

The licensee was unable to locate records showing that the indicated leakage was computed and compared to the acceptance criteria as stated in the TS 4.3.3.f. for tests conducted in 1974.

A subsequent telephone conversation on October 30, 1975 indicated that a calculation was made on October 27, 1975 with the resulting value of type "B" penetration leakage of 4% of allowable limits of .60La. The total leakage of combined "B" and "C" type testing was 8% of the allowable limits of .60La.

Retest in the as-is condition during 1975 found no leakage. The licensee assumptions that test instrument leakage was the cause of pressure drop appears to be substantiated.

Due to licensee failure to calculate the indicated leakage as required by TS 4.3.3.f this item is considered an Item of Noncompliance of a Deficiency category.

