

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

DEC 12 1975

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

License No. DPR-17  
Inspection No. 75-21  
Docket No. 50-220

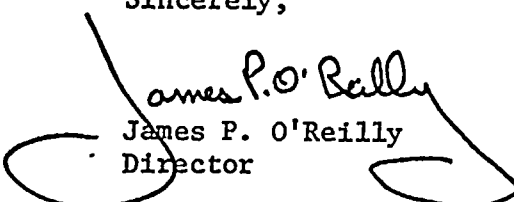
Reference your letter dated November 28, 1975  
In response to our letter dated November 5, 1975

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,

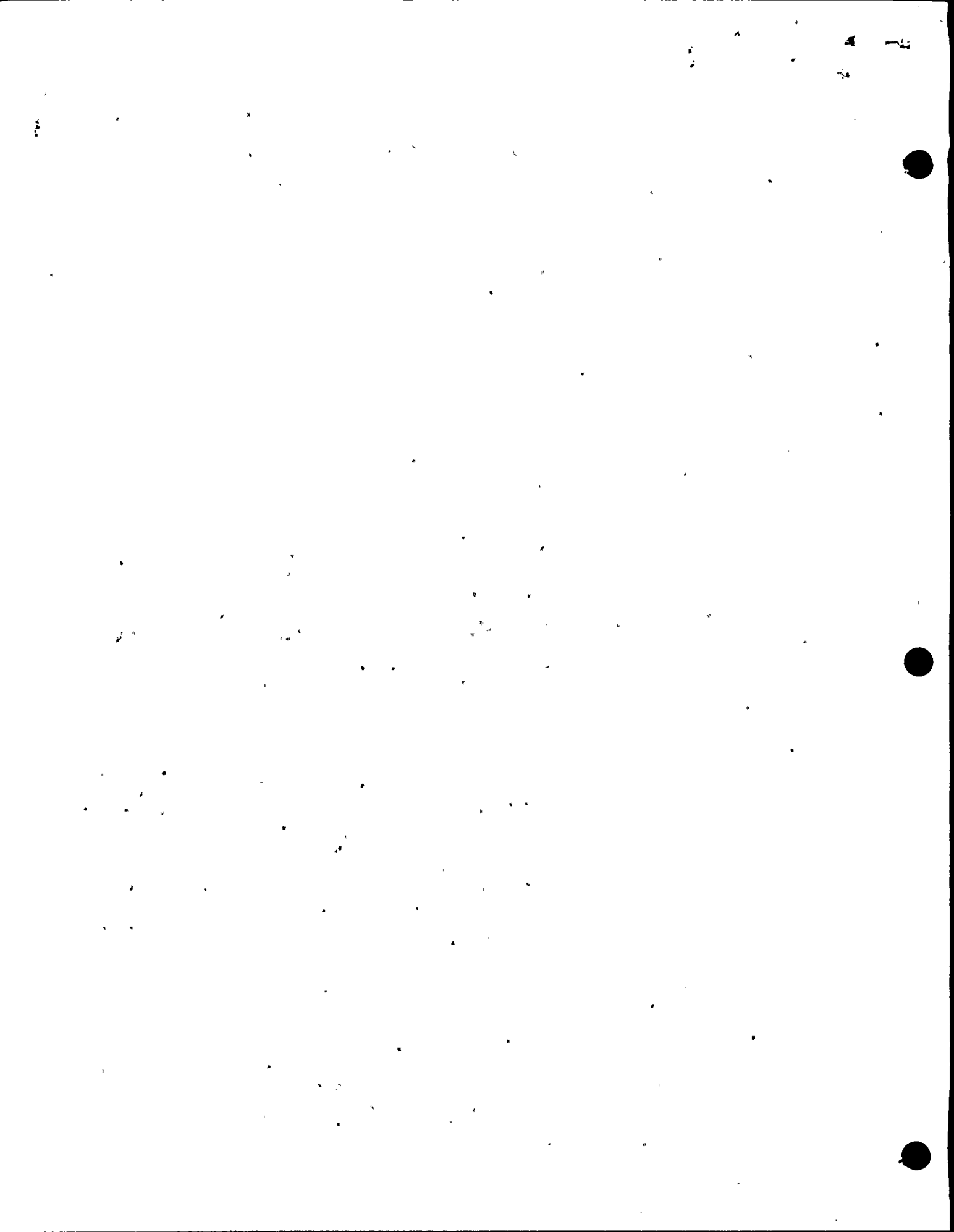
  
James P. O'Reilly  
Director

cc: T. E. Lempges, General Superintendent, Nuclear Generation  
T. J. Perkins, Plant 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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*JRS*



NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

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

November 28, 1975

Mr. James P. O'Reilly  
Directorate  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19406

RE: Docket No. 50-220  
Inspection Report 75-21

Dear Mr. O'Reilly:

Following a thorough and careful review of your letter and Inspection Report 75-21, concerning the inspection of our nuclear facility at Nine Mile Point Unit #1 by Mr. T. Martin of your office, we have concluded that these correspondents may be placed in the NRC's Public Document Room without change.

Your letter asked that in addition to the replies to the specific alleged infractions and deficiencies, we inform you of those actions taken or planned to improve the effectiveness of our Management Control Systems. In this regard and specifically, regarding the alleged infractions A & B and the alleged deficiencies E&F:

Niagara Mohawk's management is also concerned with the proper implementation of reviewed and approved procedures and administrative practices. It is not now the practice, nor will it ever become the practice of Niagara Mohawk Management to allow plant supervisors to knowingly disregard an approved and implemented procedure, whether technical in nature or administrative. A recent meeting held at the plant site with the Superintendent Nuclear Generation, an Executive Vice President and myself re-emphasized this conviction. It was emphasized that personnel errors will be given the same degree of analysis and investigation now afforded any serious event involving public safety. The prime importance will be continued safe plant operation and disciplinary action, if necessary, will be implemented such that the end result is achieved.

Specifically, the following actions are planned to improve the effectiveness of our Management Control Systems:

- 1) With the recent addition of a full-time Training Supervisor, increased emphasis on the Administrative Procedures and Technical Procedures is now possible. Programs will be established requiring plant supervision, licensed and non-licensed to participate in lectures, home-reading assignments, and examinations where necessary to assure a high level of understanding of the many procedures.

2. A guidance list of administrative audits required by the Administrative Procedures will be established for each major supervisory position.
3. The normal number of rotating shift operators is being expanded. This will make available an extra shift. This would allow one shift to be in uninterrupted training for a week at a time, thus permitting more detailed presentation of the many procedure changes that have occurred in the past year.

Regarding the alleged infractions C & D:

It was not then nor is it now, the intention of Niagara Mohawk Management to circumvent or forestall the implementation of any criteria, regulation or license requirement in the safe operation of its Nine Mile Point Nuclear Plant. It is our belief that the alleged infractions resulted from a conscientious action taken to safely and practically perform the required testing and is indicative not of a lack of concern about Appendix J to 10 CFR 50, but rather of a determination to meet the intent of the then existing criteria within the boundaries of continued safe plant operation and the practical realities of the testing.

In that regard, revised information in response to an NRC request (1) has been assembled, reviewed and documented with the NRC Washington Office, (2) delineating the specific areas of practical non-conformantity with 10 CFR 50; Appendix J.

Enclosure 1 to this letter provides specific information pursuant to the provisions of Section 2.201, Part 2, Title 10, Code of Federal Regulations, concerning the alleged infractions and deficiencies numerated in your Appendix A.

Very truly yours,



R.R. Schneider  
Vice President -  
Electric Operations

Enc.

TJD/mm

Enclosure 1

- A. "Contrary to Technical Specification 6.8.1 and Refueling Procedure OP-34, the Control Operator did not continuously monitor nuclear instrumentation during fuel insertion into the core."

RESPONSE:

As is reported in your Inspection Report, the Station Shift Supervisor emphasized the importance of continuously monitoring the Source Range Monitors to the Control Room Operator. This resulted in full compliance with OP-34, Refueling Procedure, and as is further noted, no further deficiencies in this area were experienced. To prevent future occurrences of this nature, a fifth shift is being implemented which would provide uninterrupted training on a more frequent basis for the shift operators.

- B. "Contrary to Technical Specification 6.8.1 and Administrative Procedure AP-5, the Master Copy of the Refueling Procedure (OP-34) was incomplete; in that Section B, Plant Operating Requirements, and Section C, Preparation for Fuel Movement, were missing."

RESPONSE:

The procedure was immediately corrected with the addition of the missing sections. The inspection of the associated check lists, coupled to the missing sections revealed no deficiencies indicating that these sections were in use when needed. The removal of the "Master Copy" will not be permitted unless those sections are to be immediately replaced with revised sections. This will be emphasized during training sessions.

- C. "Contrary to 10 CFR 50, Appendix J, Section II.H.2, automatic Oxygen Sample Containment Isolation Valves were not tested for leakage as required."

RESPONSE:

Due to a misinterpretation of the requirements, these valves were inadvertently left off the local leak rate tests. These valves are normally closed and are open for periodic sampling of the containment atmosphere. However, if a sample were being taken and an isolation signal occurred, they would automatically close. Therefore, they have been added to the local leak rate tests and have been tested during this refueling outage. The entire leak rate testing program has been reviewed in detail and it is believed that future occurrence of this nature will not occur. Compliance has been completed.

- D. "Contrary to 10 CFR 50, Appendix J, Section II.H.4, Feedwater Containment Isolation Valves, were not tested for leakage as required."

D. Continued

RESPONSE:

These valves are part of the High Pressure Coolant Injection System (HPCI). HPCI must be available during a loss-of-coolant accident. Therefore, the valves are not relied upon to perform a containment isolation function. Accordingly on October 24, 1975, Technical Specification changes to this effect were submitted. Compliance has been completed.

E. "Contrary to Technical Specification 6.8.1 and ANSI N18.7-1972, outdated refueling equipment check procedures were in use."

RESPONSE:

The correct procedure was immediately placed into operation, thus correcting the situation. To prevent further re-occurrence, an administrative request will be issued requiring all plant supervisors to establish and maintain an administrative audit file. This file will contain items and dates of committed inspections of forms, records, and procedures. This will insure that each supervisor has consolidated his requirements, required by the approved Administrative Procedures, for periodic audit and review in areas of his responsibility. This should be implemented by January 1, 1976.

F. "Contrary to Technical Specification 6.8.1 and ANSI N18.7-1972, Surveillance Test Procedure W-3 was not present when the test was improperly performed."

RESPONSE:

The test procedure was made available to the operator who thus performed the surveillance test satisfactorily. This test was performed after this event in conformance with Technical Specification 6.8.1 and it was stressed upon the operators that the detailed procedure, not only the check-off sheet is required for these tests. This will be further emphasized in training sessions.