

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

DK Central file

JUN 13 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. 75-07
Docket No. 50-220

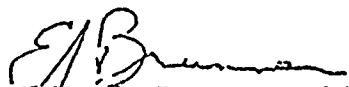
Reference: Your letter dated June 5, 1975
In response to our letter dated May 23, 1975

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.

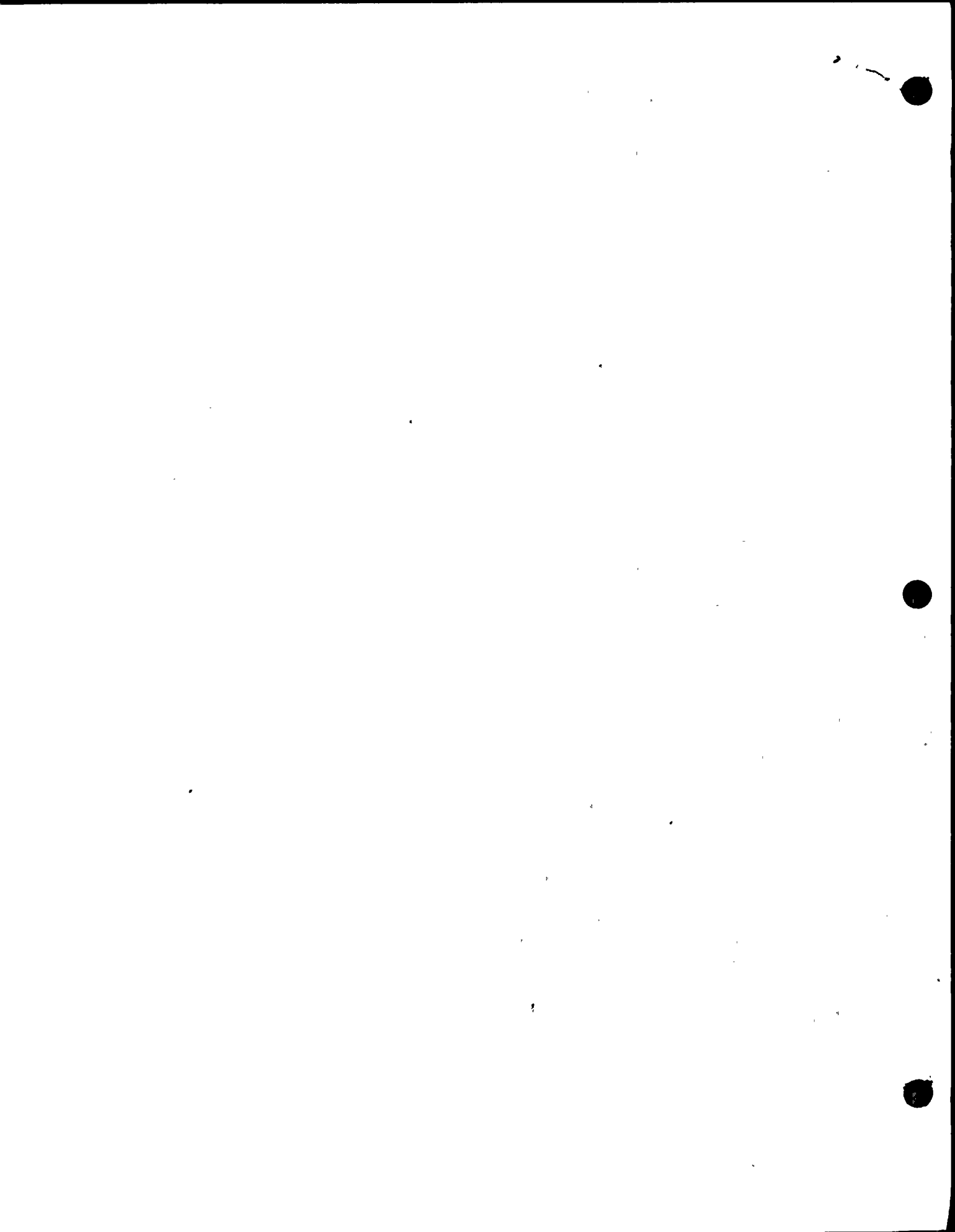
Your cooperation with us is appreciated.

Sincerely,


Eldon J. Brunner, Chief
Reactor Operations Branch

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

bcc:
IE Chief, FS&EB
IE:HQ (4)
IE Files
Central Mail & Files
Directorate of Licensing (4)
Regulatory Standards
PDR
Local PDR
NSIC
TIC
REG:I Reading Room,
ELD
State of New York



NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

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

June 5, 1975

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

RE: Docket No. 50-220/75-07

Dear Mr. Brunner:

Following a thorough review of Inspection Report 75-07 on Nine Mile Point Unit #1, conducted by Mr. Johnson of your staff on May 6-9, 1975, we have concluded that the report may be placed in the NRC's Public Document Room.

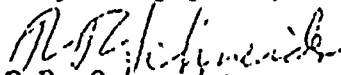
Pursuant to 10CFR Part 2, Section 2.201, the following information is submitted concerning Appendix A to your report:

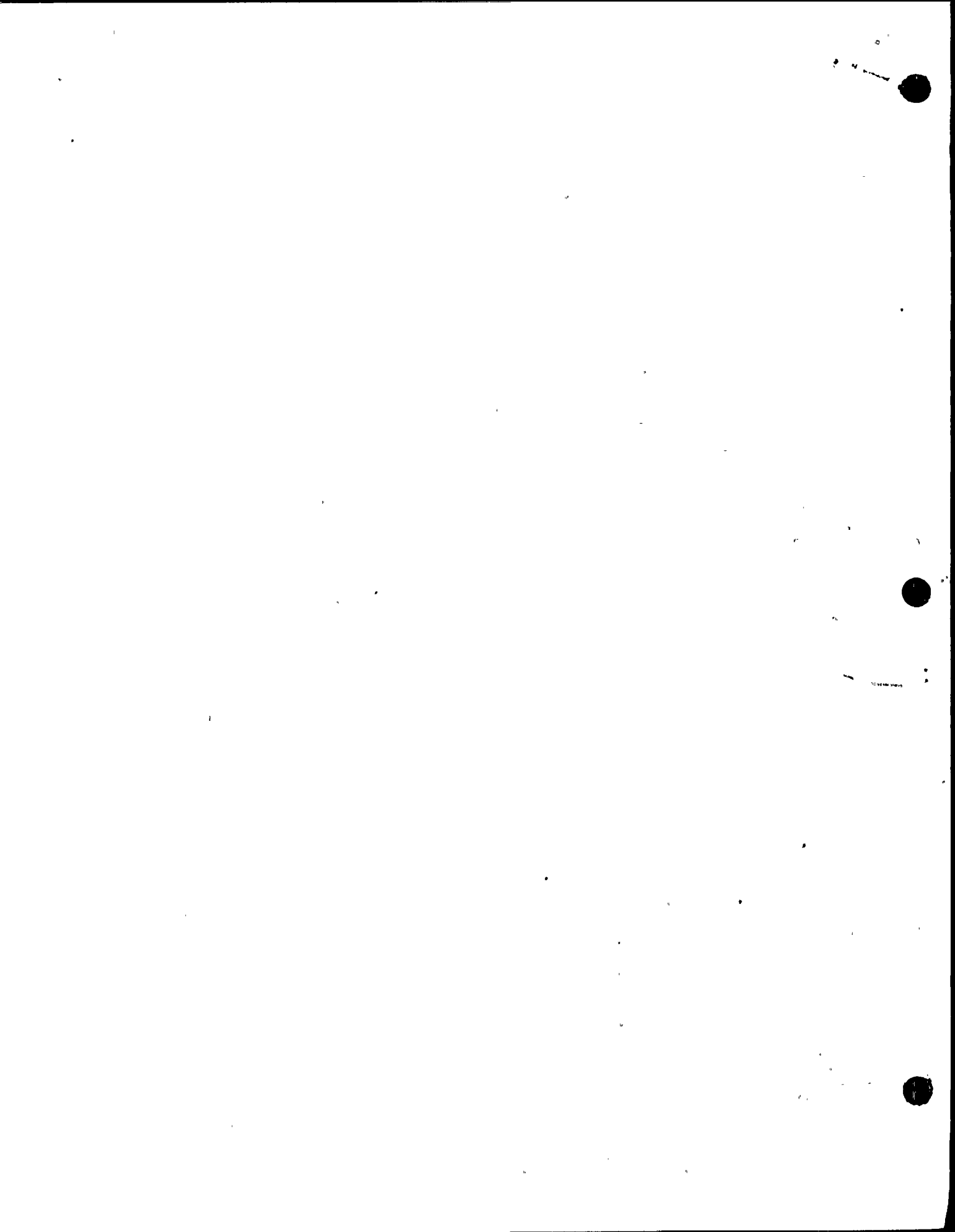
"Contrary to the requirements of 10 CFR 50, Appendix B, Criterion VI, the Technical Specifications Section 6.8.2 and the Licensee's Administrative Procedure AP-9, Section 5.0, Station Standing Orders have not been properly reviewed."

RESPONSE:

All standing orders issued in January and February of 1974 were reviewed by the Site Operations Review Committee on Jan. 4; Jan. 31, and Feb. 26, 1974. A subsequent review by the Operations Supervisor was conducted during June and July 1974, however, it was not documented. A review conducted in January and February of 1975 was documented and is in the files indicating that compliance has been achieved on this item. To prevent re-occurrence, the Operation Supervisor will conduct and document all reviews to the Standing Orders. Upon his recommendation to upgrade the order to a procedure and following implementation, the superseded standing order will be removed from the control room copy and replaced with a reference to the Administrative Procedure.

Very truly yours,


R.R. Schneider
Vice President - Electric Operations



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MAY 23 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. 75-07
Docket No. 50-220

Gentlemen:

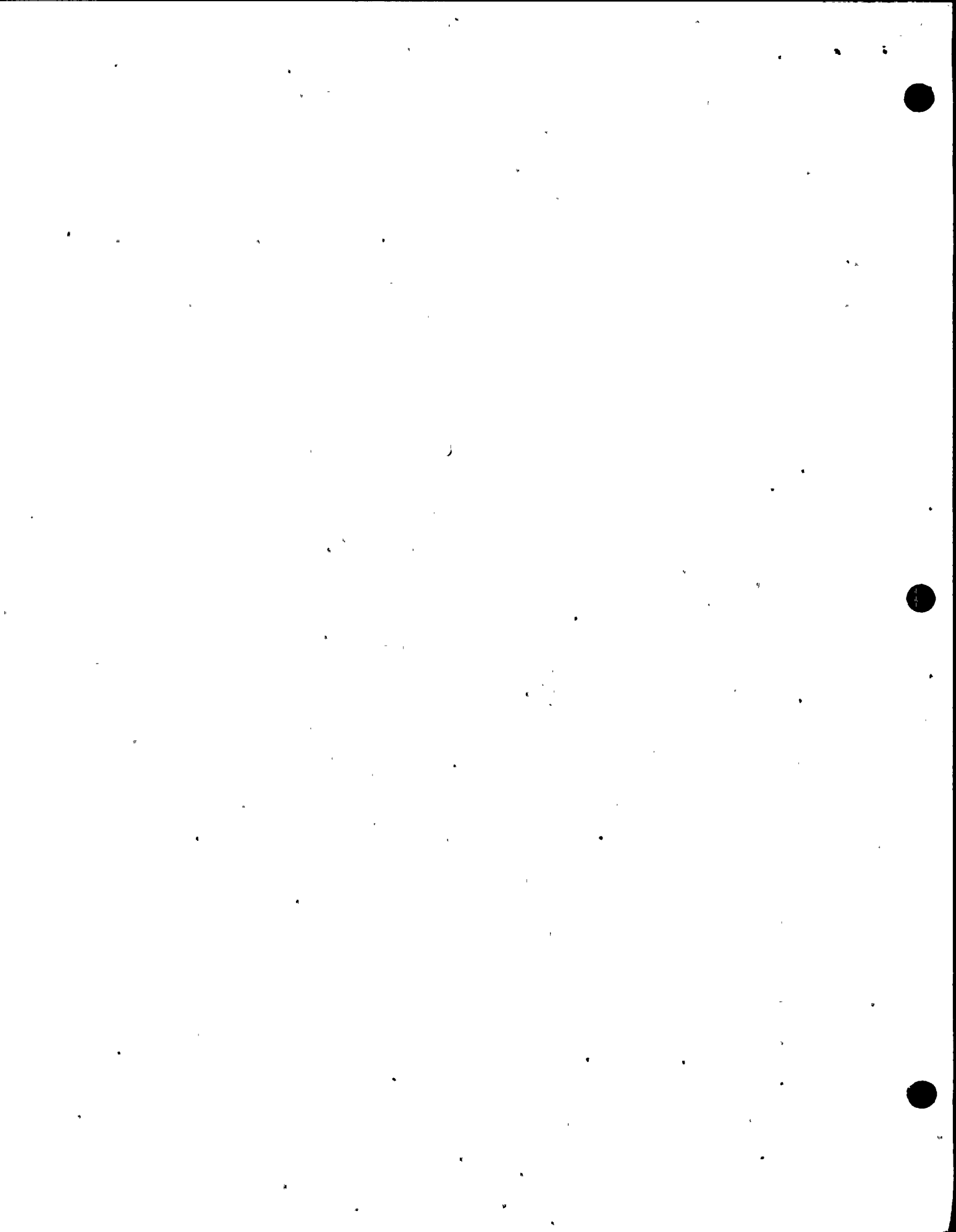
This refers to the inspection conducted by Mr. Johnson of this office on May 6-9, 1975 at Nine Mile Point Unit 1, Scriba, New York, of activities authorized by NRC License No. DPR-63 and to the discussions of our findings held by Mr. Johnson with Mr. T. E. Lempges and others of your staff at the conclusion of the inspection, and to a subsequent telephone discussion between Mr. Johnson and Mr. Perkins on May 14, 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 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

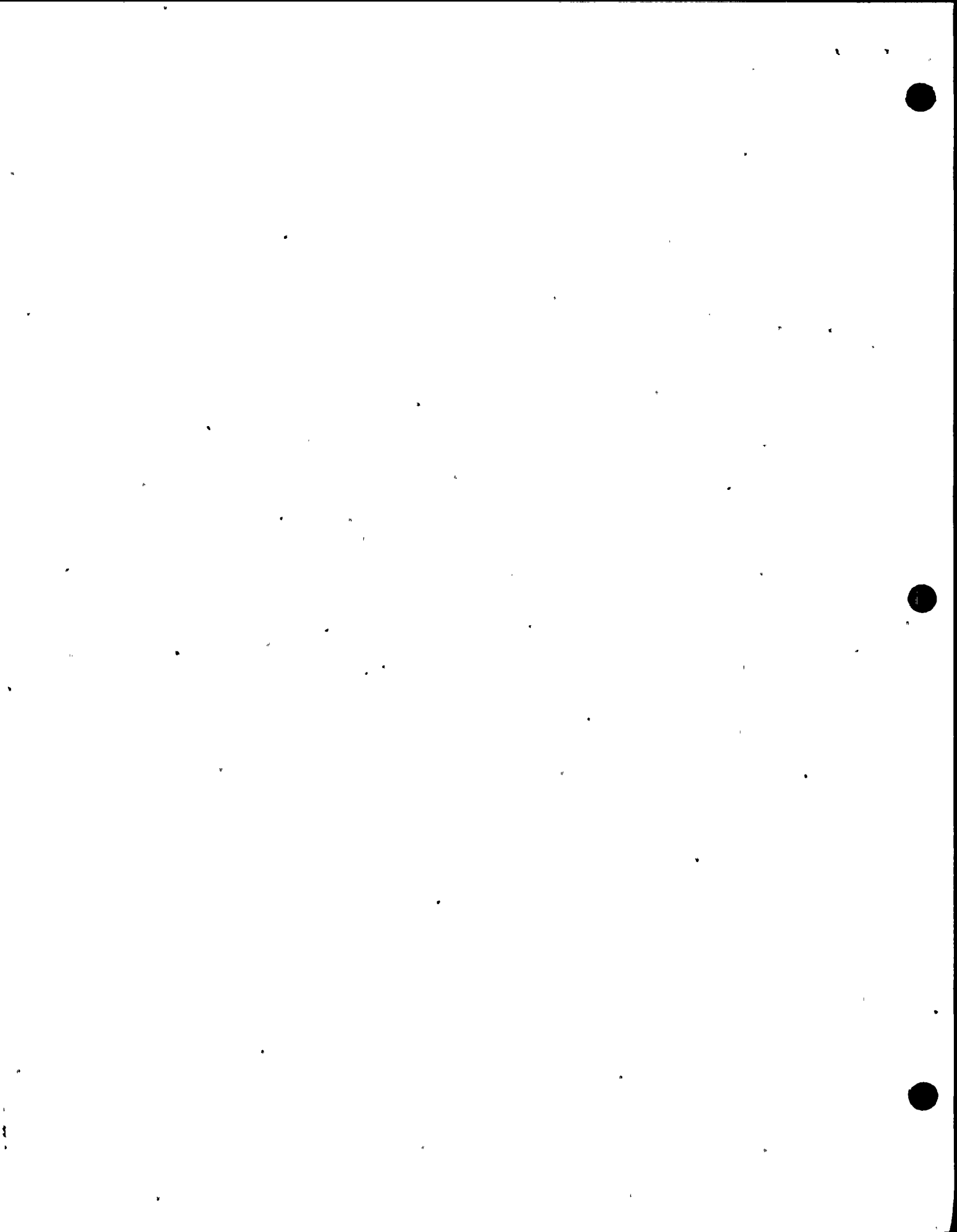
Enclosures:

1. Appendix A, Notice of Violation
2. IE:I Inspection Report No. 50-220/75-07

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 (Without Report)

bcc:

IE Chief, FS&EB
IE:HQ (4 cys ltr, 5 cys report)
IE Files
Central Mail & Files
Directorate of Licensing (4 cys ltr, 13 cys report)
Regulatory Standards (1 cy ltr, 3 cys report)
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Local PDR
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TIC
REG:I Reading Room
Region Directors (II, III, IV) (Report Only)
ELD
State of New York
A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment



APPENDIX A

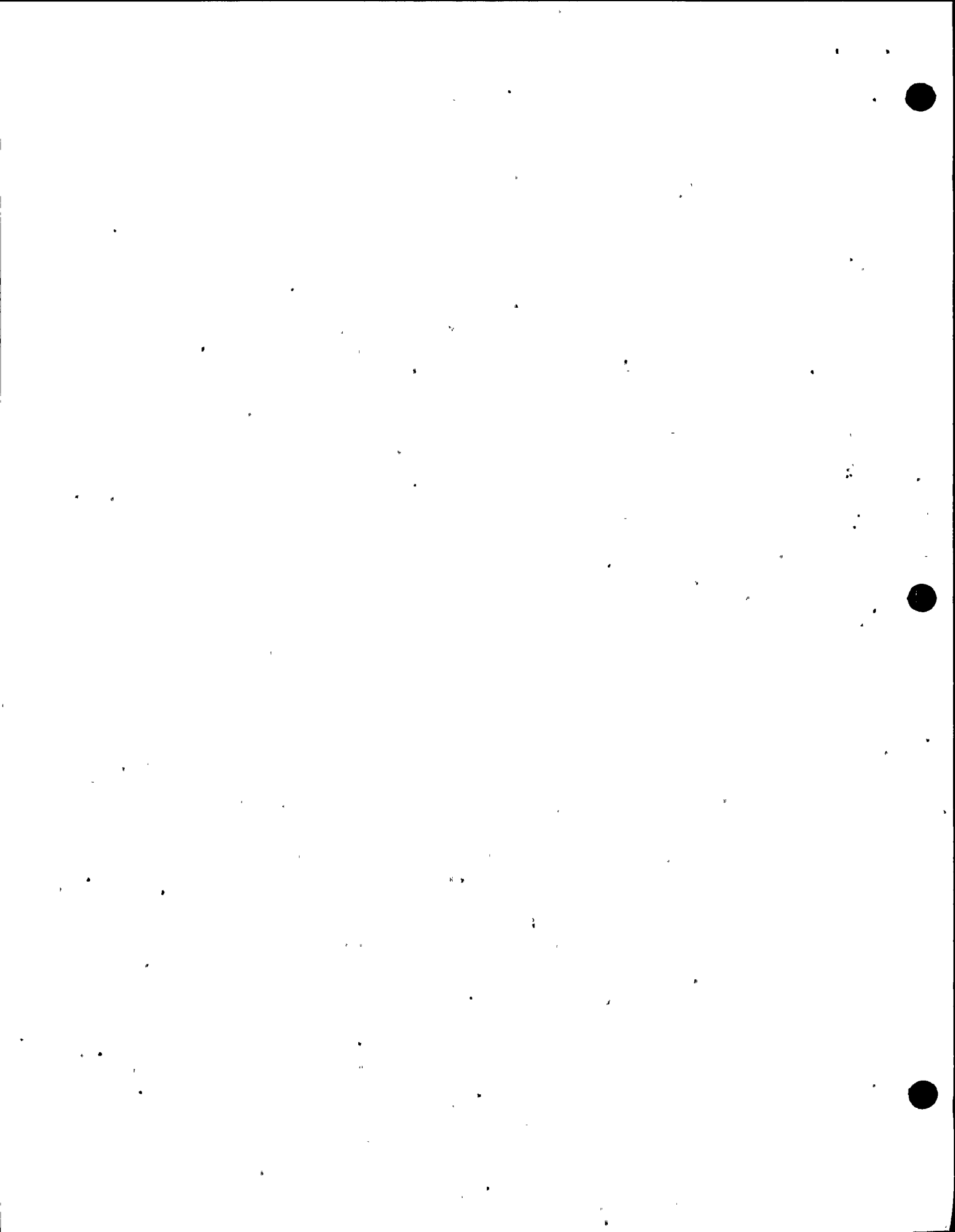
NOTICE OF VIOLATION

Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202
License No. DPR-63
Docket No. 50-220

Based on the results of an NRC inspection conducted on May 6-9, 1975, it appears that one of your activities was not conducted in full compliance with conditions of your license as indicated below:

Contrary to the requirements of 10 CFR 50, Appendix B, Criterion VI, the Technical Specifications Section 6.8.2 and the Licensee's Administrative Procedure AP-9 Section 5.0 Station Standing Orders have not been properly reviewed.

This Deficiency was identified by the inspector.



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

IE Inspection Report No: 50-220/75-07

Docket No: 50-220

Licensee: Niagara Mohawk Power Corporation

License No: DPR-63

300 Erie Boulevard, West

Priority: --

West Syracuse, New York 13202

Category: C

Safeguards
Group: --

Location: Nine Mile Point Unit 1, Scriba, New York

Type of Licensee: BWR (GE) 1850 MW(t)

Type of Inspection: Routine, Unannounced

Dates of Inspection: May 6-9, 1975

Dates of Previous Inspection: April 29 - May 5, 1975

Reporting Inspector: *D. F. Johnson*
D. F. Johnson, Reactor Inspector

5/22/75
DATE

Accompanying Inspectors: None

DATE

DATE

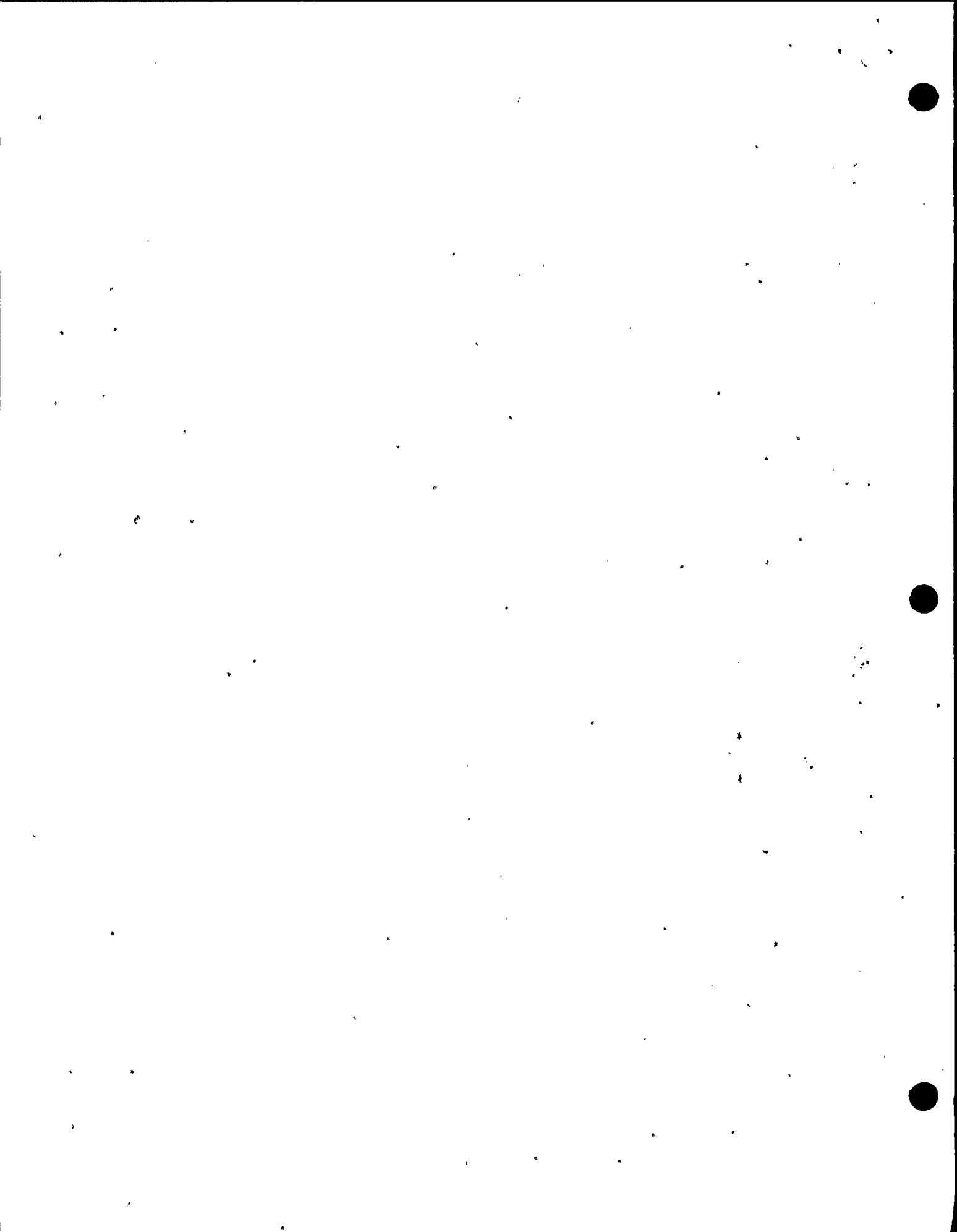
DATE

Other Accompanying Personnel: None

DATE

Reviewed By: *W. A. Ruhlman for E. C. McCabe*
E. C. McCabe, Senior Reactor Inspector
Nuclear Support Section
Reactor Operations Branch

5/22/75
DATE



SUMMARY OF FINDINGS

Enforcement Action

A. Items of Noncompliance

1. Deficiency

Contrary to the requirements of 10 CFR 50 Appendix B, Criterion VI, the Technical Specifications Section 6.8.2 and the licensee's Administrative Procedure AP-9 Section 5.0, Station Standing Orders have not been properly reviewed. (Detail 2)

Licensee Action on Previously Identified Enforcement Items

Not inspected.

Design Changes

None identified.

Unusual Occurrences

None identified.

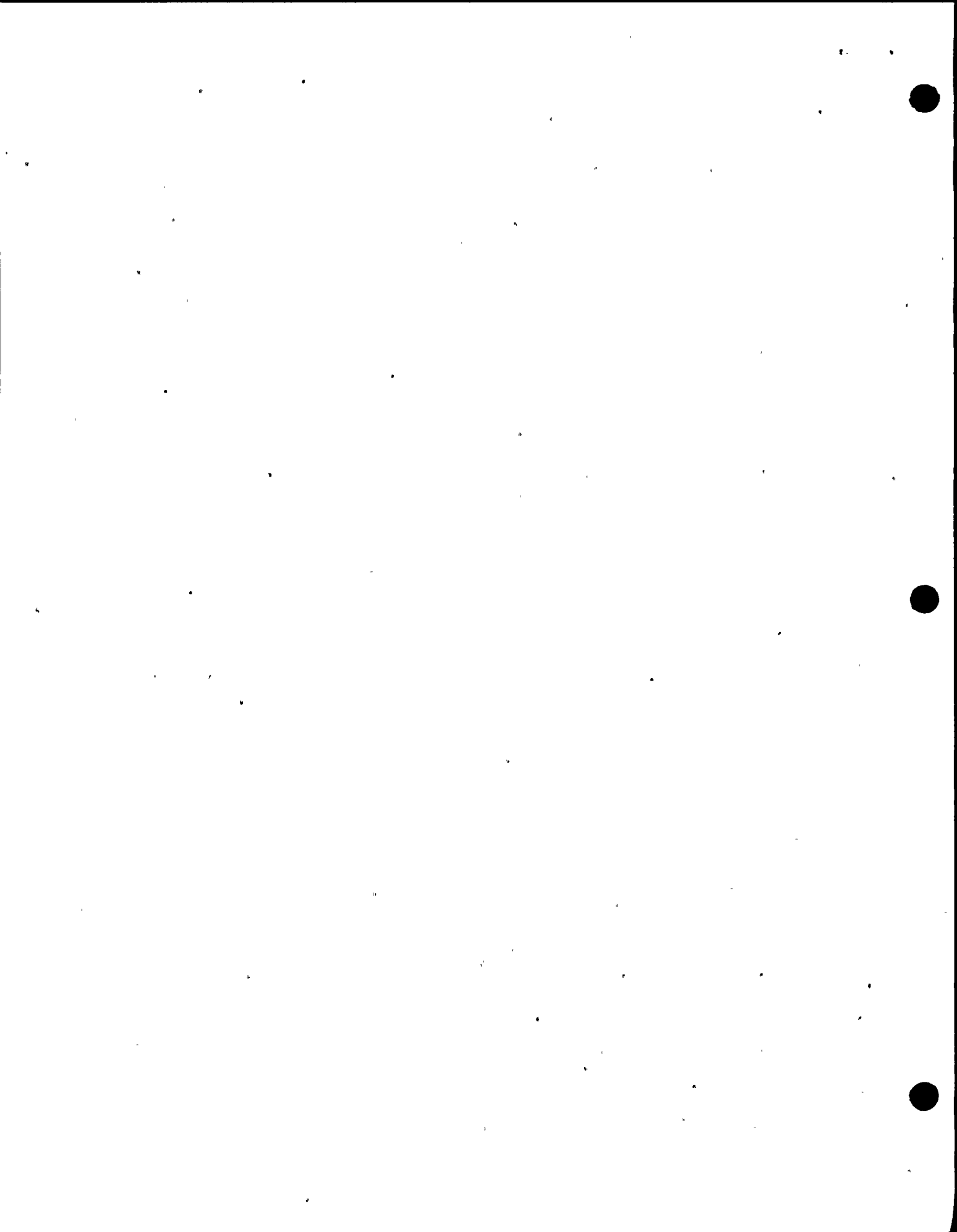
Other Significant Findings

A. Current Findings

1. Acceptable Areas

No noncompliance, deviations or unresolved items were identified in the following areas.

- a. Procedural requirements for revising, changing and upgrading facility procedures. (Detail 8)
- b. Review and approval of temporary changes to facility procedures in accordance with requirements of the Technical Specifications. (Detail 9)
- c. Methods for record retention of operations records and procedures. (Detail 10)
- d. Administrative controls for authorized management approval of facility procedures. (Detail 9)
- e. Procedural changes required by Technical Specification revisions. (Detail 9)



2. Unresolved Items

- a. Format and content of facility procedures. (Detail 7)
- b. Scope of Procedural Coverage. (Detail 6)
- c. Completion status of facility procedures upgrading program. (Detail 5)
- d. Preventive Maintenance Program. (Detail 4)
- e. Shift manning requirements for refueling. (Detail 3)

3. Status of Previously Reported Unresolved Items

- a. Preventive Maintenance (reference IE Report 50-220/74-16, paragraph 15) this item remains unresolved. (Detail 4)

Management Interview

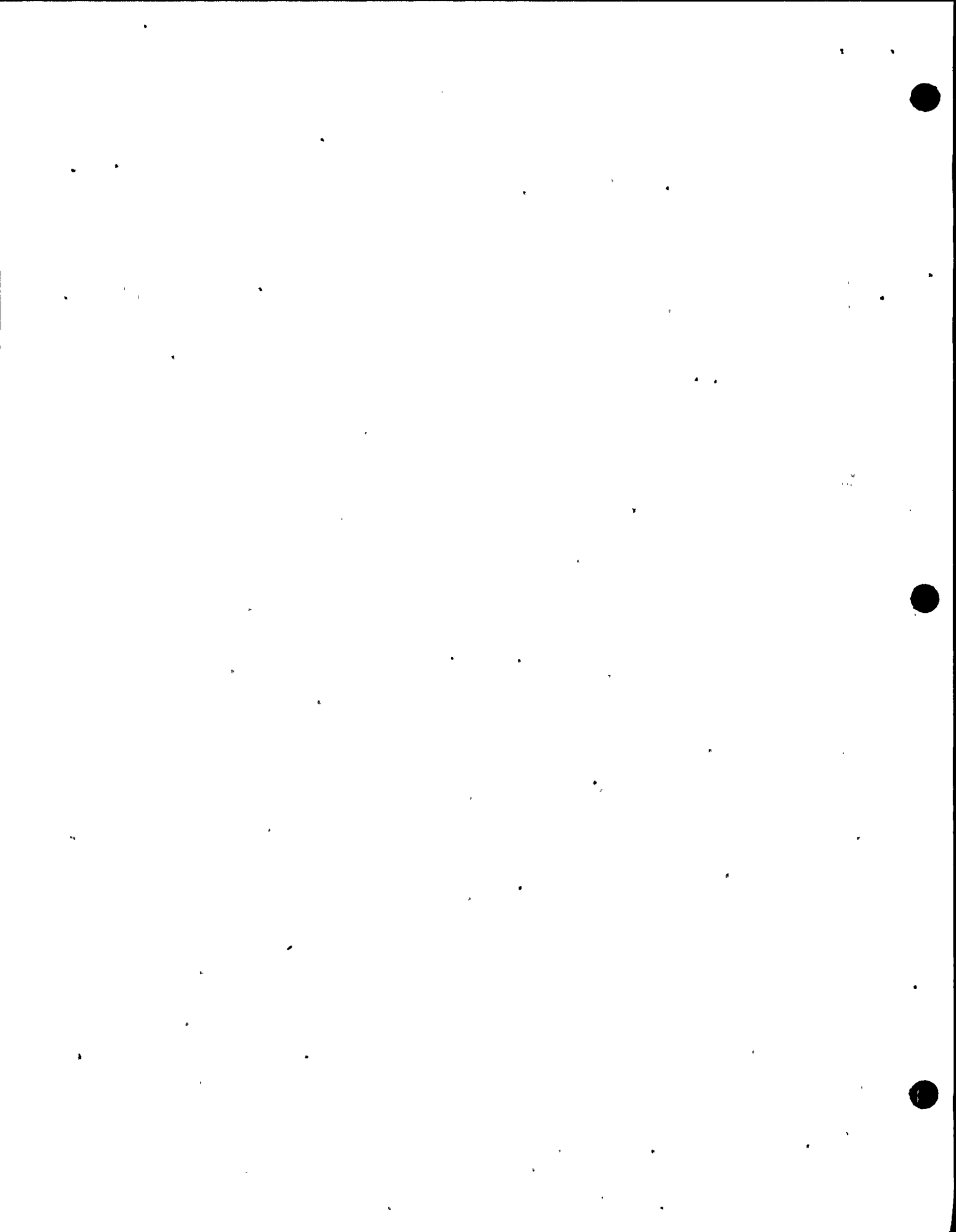
A management interview was held at the Nine Mile Point 1 Power Station on May 9, 1975, at the conclusion of the inspection.

Personnel in Attendance

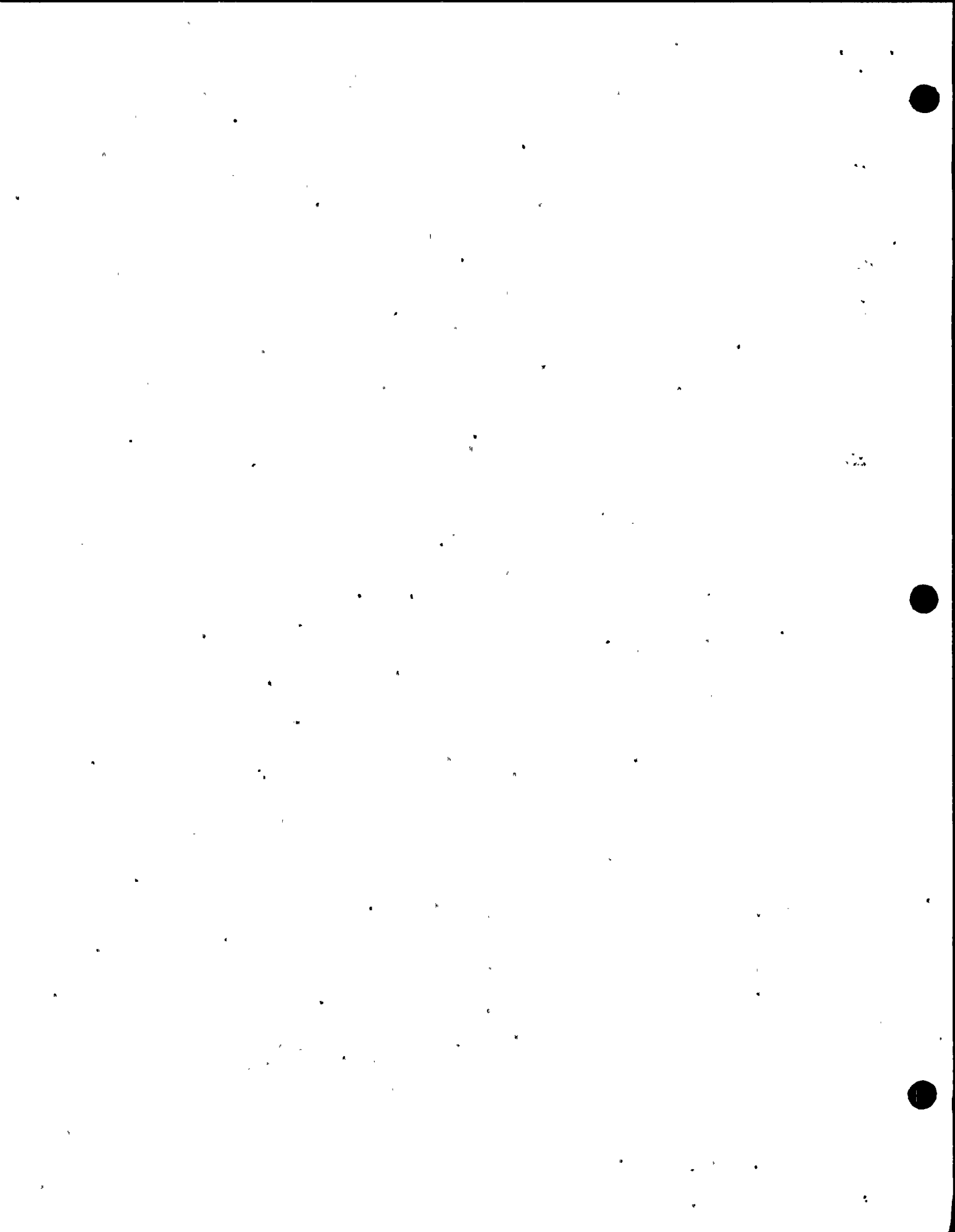
Mr. T. E. Lempges, General Superintendent, Nuclear Generation
Mr. T. J. Perkins, Station Superintendent
Mr. M. A. Sillman, Results Supervisor

Summary of Items Discussed

1. Scope of Procedural Coverage. (Detail 6)
2. Format and Content of Facility Procedures. (Detail 7)
3. Temporary changes to Procedures. (Detail 9)
4. Standing Orders. (Detail 2)
5. Review of Site Operations Review Committee (SORC) Meeting Minutes. (Detail 9)
6. Authorized management review and approval of Facility Procedures. (Detail 9)
7. Shift Manning Requirements for Refueling. (Detail 3)
8. Document Control. (Detail 10)



9. Completion Status of Facility Procedures Upgrading Program.
(Detail 5)
10. Preventive Maintenance Program. (Detail 4)



DETAILS

1. Persons Contacted

Mr. L. E. Bollin, Site Instrument and Control Supervisor
Mr. T. J. Dente, Site Reactor Analysis Supervisor
Mr. W. C. Drews, Station Shift Supervisor
Mr. M. D. Jones, Station Shift Supervisor
Mr. R. G. Jutras, Assistant to General Superintendent
Mr. T. E. Lempges, General Superintendent, Nuclear Generation
Mr. F. C. Lilly, Station Shift Supervisor
Mr. W. A. Mosher, Office Supervisor
Mr. T. J. Perkins, Station Superintendent
Mr. M. A. Sillman, Results Supervisor
Mr. B. Taylor, Assistant Instrument and Control Supervisor

2. Station Standing Orders

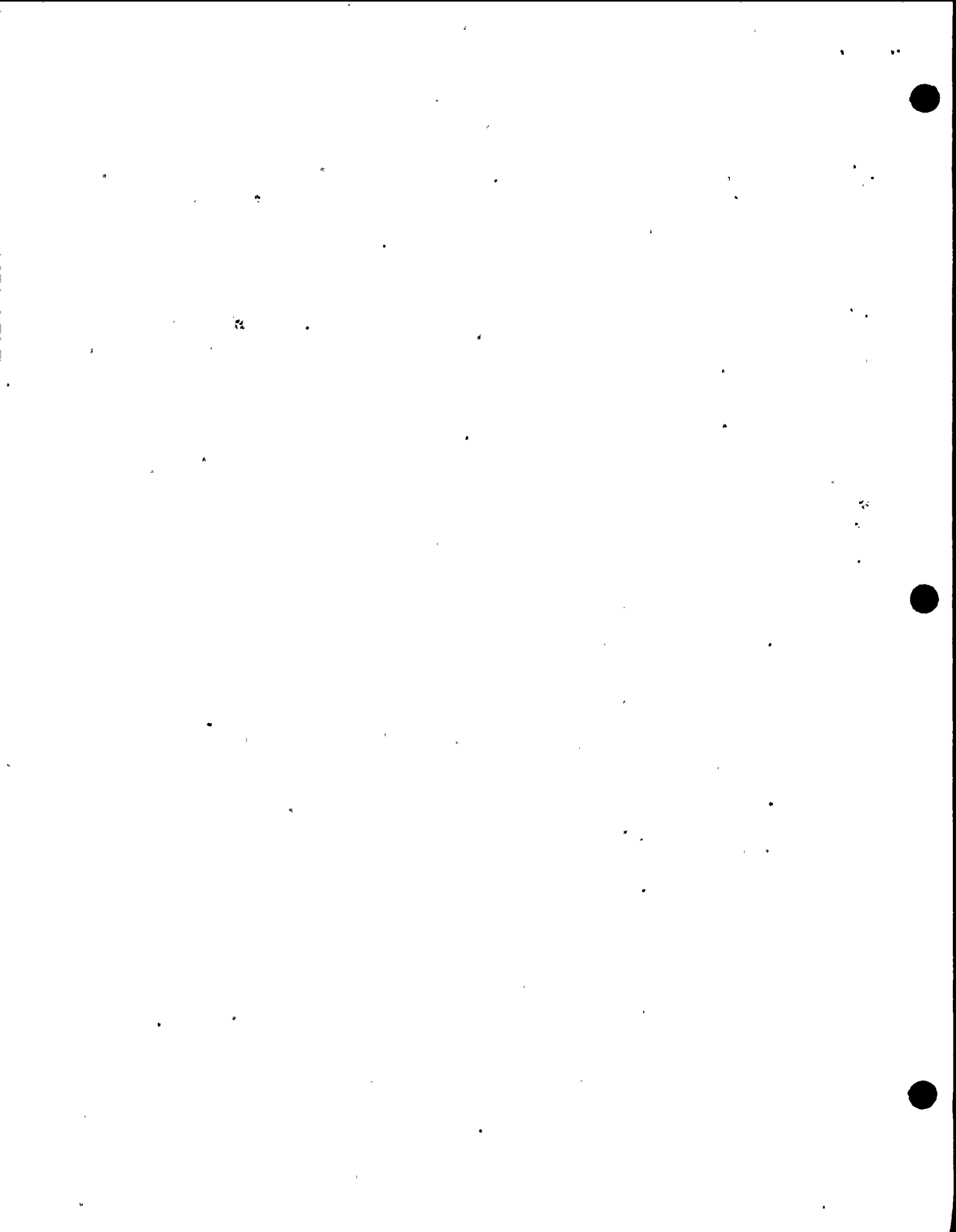
10 CFR 50, Appendix B, Criterion VI requires that measures shall be established to control the issuance of documents, such as instructions, procedures and drawings, including changes thereto, which prescribe all activities affecting quality.

These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel.

Technical Specifications Section 6.8.2 states "Each procedure and administrative policy, and changes thereto, shall be reviewed by the SORC and approved by the General Superintendent Nuclear Generation prior to implementation and periodically as set forth in each document."

The licensee's Administrative Procedure AP-9, "Procedure for Standing Orders" Section 5.0 states "all standing orders issued since the last regular SORC meeting shall be presented for review at the next SORC meeting. At least every six months. All standing orders shall be reviewed by a staff member appointed by the Plant Superintendent or General Superintendent. Recommendations shall be made at that time for removal, updating, or incorporating in the established Administrative or Operating Procedures."

Contrary to the above, the inspector through selective examination of representative records and interviews with personnel determined that Station Standby Orders issued on January and February 1974 have not been subsequently reviewed by the SORC or evaluated by management to determine their current applicability.



In addition Administrative Procedure AP-16A "Placement of Jumpers or Blocks or Lifting of Leads" issued on June 24, 1974 superseded Station Standing Order SSO-2 "Placement of Jumpers/Blocks or Lifting of Leads" has not been subsequently removed from the station Shift Supervisor's Standing Order book currently in use in the control room.

This failure to properly review Station Standing Orders is considered a Deficiency level Item of Noncompliance.

3. Shift Manning Requirements for Refueling

The licensee's Technical Specification Section 6.2.2.e states that "a Senior Licensed Operator shall be responsible for all movement of new and irradiated fuel within the site boundary."

The licensee stated their interpretation of the above statement would allow an individual Senior Licensed Operator to share responsibilities as Station Shift Supervisor directing all shift activities in conjunction with directing fuel handling activities.

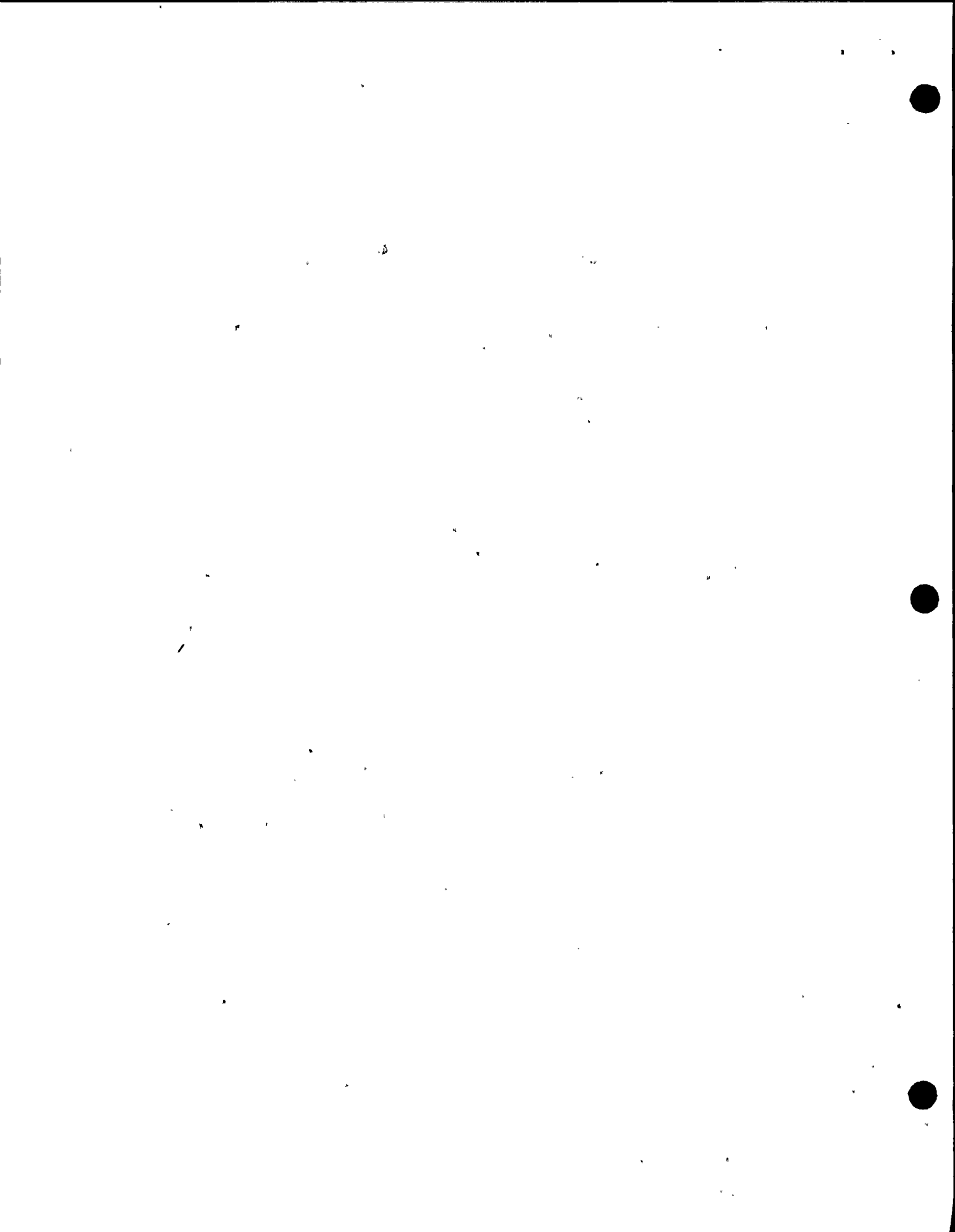
The inspector stated NRC's position is that all core alterations after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation. (Reference B. H. Grier memo RO:OB:181 II.C. October 16, 1973, Division of Reactor Licensing Standard Technical Specifications January 21, 1975, Section 6.2.2.e, Division of Reactor Licensing letter Lear to Jersey Central Power & Light Company April 11, 1975.)

This item is unresolved.

4. Preventive Maintenance Program

The inspector through examination of representative records and discussions with the licensee questioned the adequacy of the preventive maintenance program.

Examples of questionable areas include but are not limited to the following:



- a. A preventive maintenance schedule should be established and maintained which describes the frequency and type of maintenance to be performed.
- b. Detailed procedures should be written for maintenance that can affect the performance of safety related equipment.

The licensee concurred with the inspector's comments and stated a schedule for preventive maintenance that defines the equipment, frequency and type of maintenance will be specified, documented and supported by written procedures. The licensee further stated that a tentative date of November, 1975, has been set for the completion of this program.

This is an unresolved item pending implementation of licensee's actions.

5. Completion Status of Facility Procedures Upgrading Program

The licensee has instituted a major program for revision of existing plant operating procedures to meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7 - 1972 in accordance with the requirements of Technical Specifications Section 6.8.1.

Information obtained during this inspection indicates the following status of completion.

Total No. of Procedures - 46
Total No. SORC Approved - 6 (13%)
Total No. Written Awaiting Approval - 10 (22%)
Total No. Undergoing Revision not Completed - 10 (22%)
Total No. of Procedures Remaining to be Revised - 20 (43%)

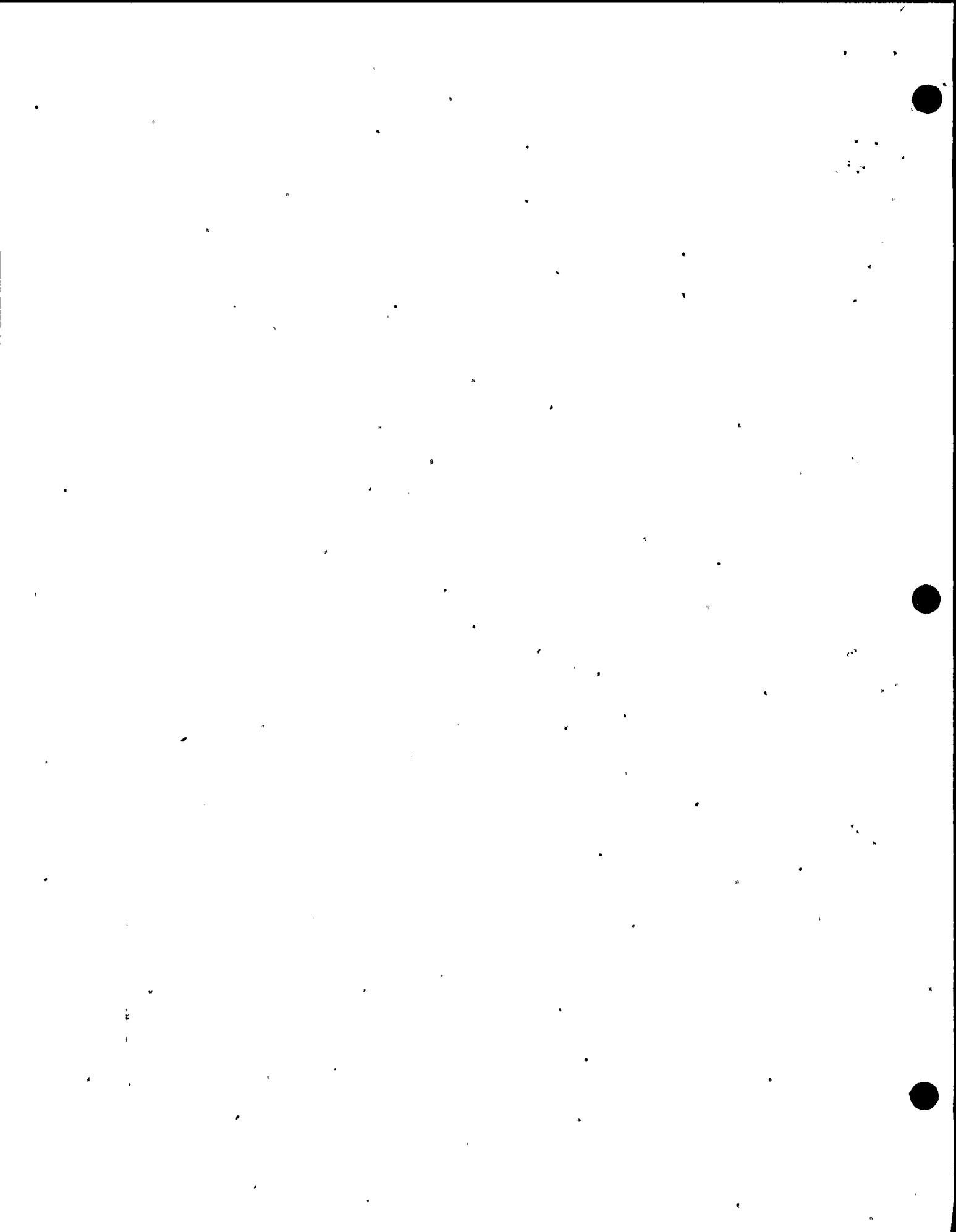
The inspector requested a date as to when the revision of operating procedures would be completed.

The licensee stated all operating procedures would be revised, reviewed and approved by December 1975.

This item is unresolved pending implementation of licensee action.

6. Scope of Procedural Coverage

Based upon review of procedure indices, examination of representative records and discussions with the licensee, the inspector questioned the facility procedure coverage scope.



Examples of areas with questionable coverage include, but are not limited to the following.

a. Administrative Procedures

- (1) Authorities and Responsibilities for Safe Operation and Shutdown
- (2) Recall of Standby Personnel
- (3) Requirements for Periodic Review of Facility Procedures

b. Operating Procedures

- (1) Emergency Power Sources
 - (a) Batteries
 - (b) DC Systems
- (2) Reactor Head Seal Detection System
- (3) Communications Systems
- (4) Area Radiation Monitoring System
- (5) Process Monitoring System

c. Emergency Procedures

- (1) Loss of Flow
- (2) Irradiated Fuel Damage While Refueling

The licensee stated that he would initiate or revise existing procedures to include procedural coverage for the above items.

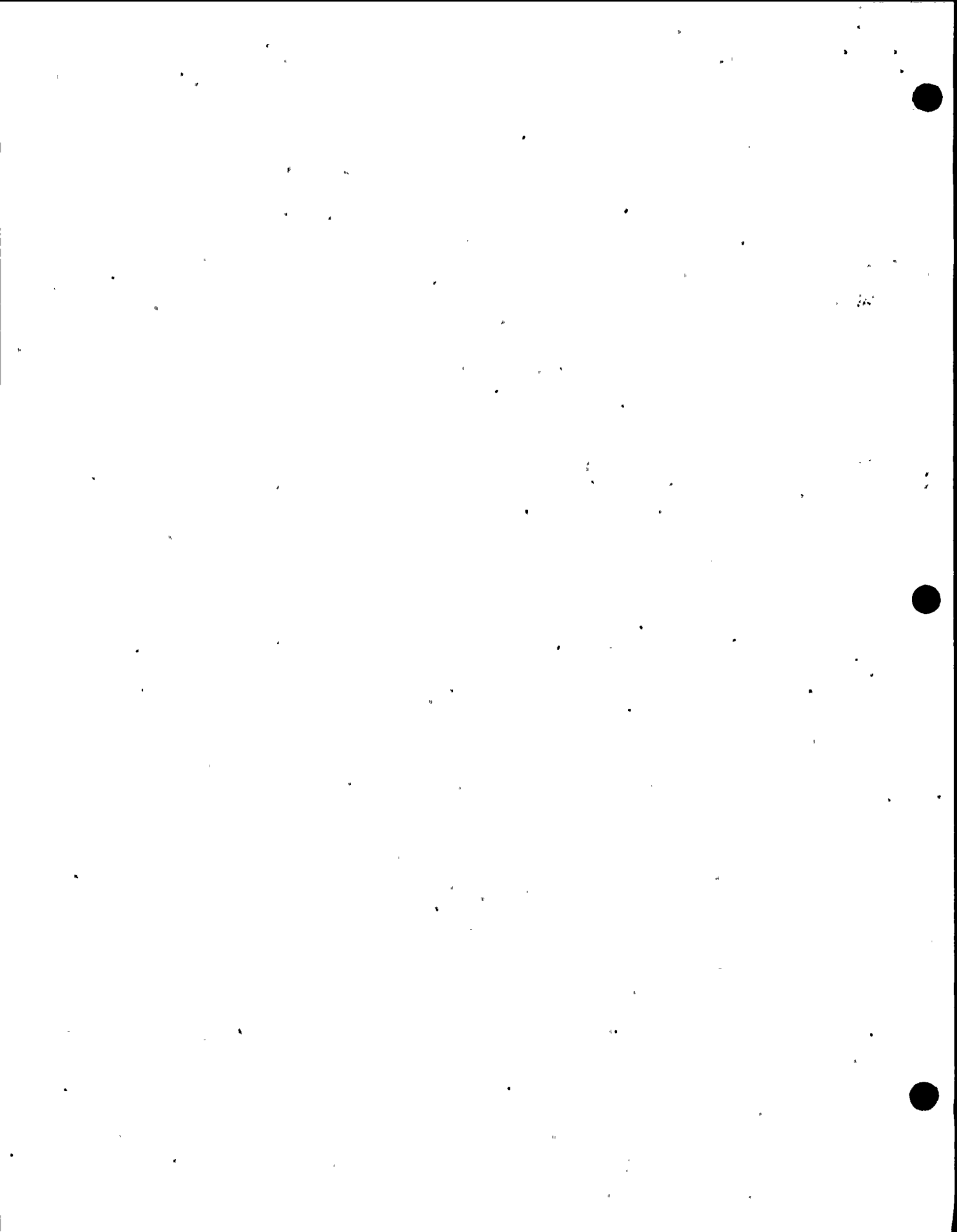
This is an unresolved item pending implementation of licensee action.

7. Format and Content of Facility Procedures

The inspector conducted an audit of the facility procedures program by a sampling review of the following procedures.

a. Administrative Procedures

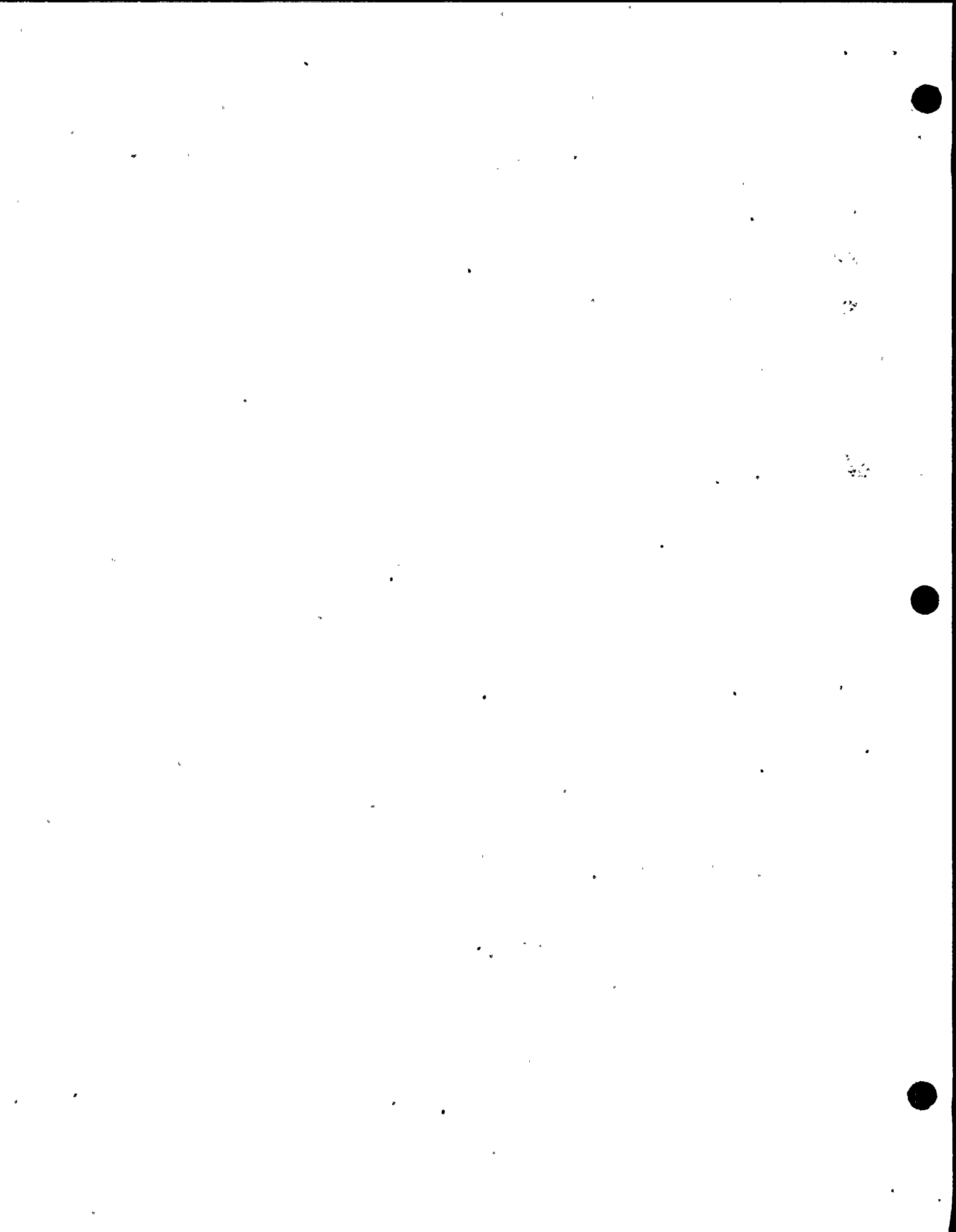
- (1) AP-1 Procedures for Administrative Controls



- (2) AP-2 Composition and Responsibilities of Site Organization
- (3) AP-2A Composition and Responsibilities of Station or Plant Organization
- (4) AP-5 Procedure for Control of Procedures
- (5) AP-7 Preparation, Review and Approval of Operating Procedures
- (6) AP-7A-N-1 Index of Operating Procedures Nine Mile 1
- (7) AP-8 Procedure for Maintenance Procedures
- (8) AP-9 Procedure for Standing Orders
- (9) AP-11 Preparation and Approval of Special Procedures
- (10) AP-15 Procedure for Special Orders and Instructions
- (11) AP-16 Procedure for Control of Equipment Markup, etc.
- (12) AP-16A Placement of Jumpers or Blocks or Lifting of Leads

b. Operating Procedures

- (1) OP-1 Nuclear Steam Supply System
- (2) OP-12 Liquid Poison System
- (3) OP-13 Emergency Core Cooling
- (4) OP-9 Containment and Pressure Suppression Inerting System
- (5) OP-40 Reactor Protection System
- (6) OP-38A Source Range Monitors
- (7) OP-21 Fire Protection System
- (8) OP-31 Steam Turbine
- (9) OP-17 Makeup Demineralizer System
- (10) OP-10 Reactor Building Heating and Ventilation System



c. Emergency Procedures

- (1) SP-1 Loss of Coolant
- (2) SP-4 Feedwater Malfunction
- (3) SP-5 Instrument Air Failure

d. Maintenance Procedures

- (1) M5.1 Maintenance of Recirculation Pumps
- (2) M6.2 Overhaul of Control Rod Drives

The inspector provided the licensee with specific generic inadequacies concerning the operating procedures relative to the requirements and recommendations of ANSI N18.7.

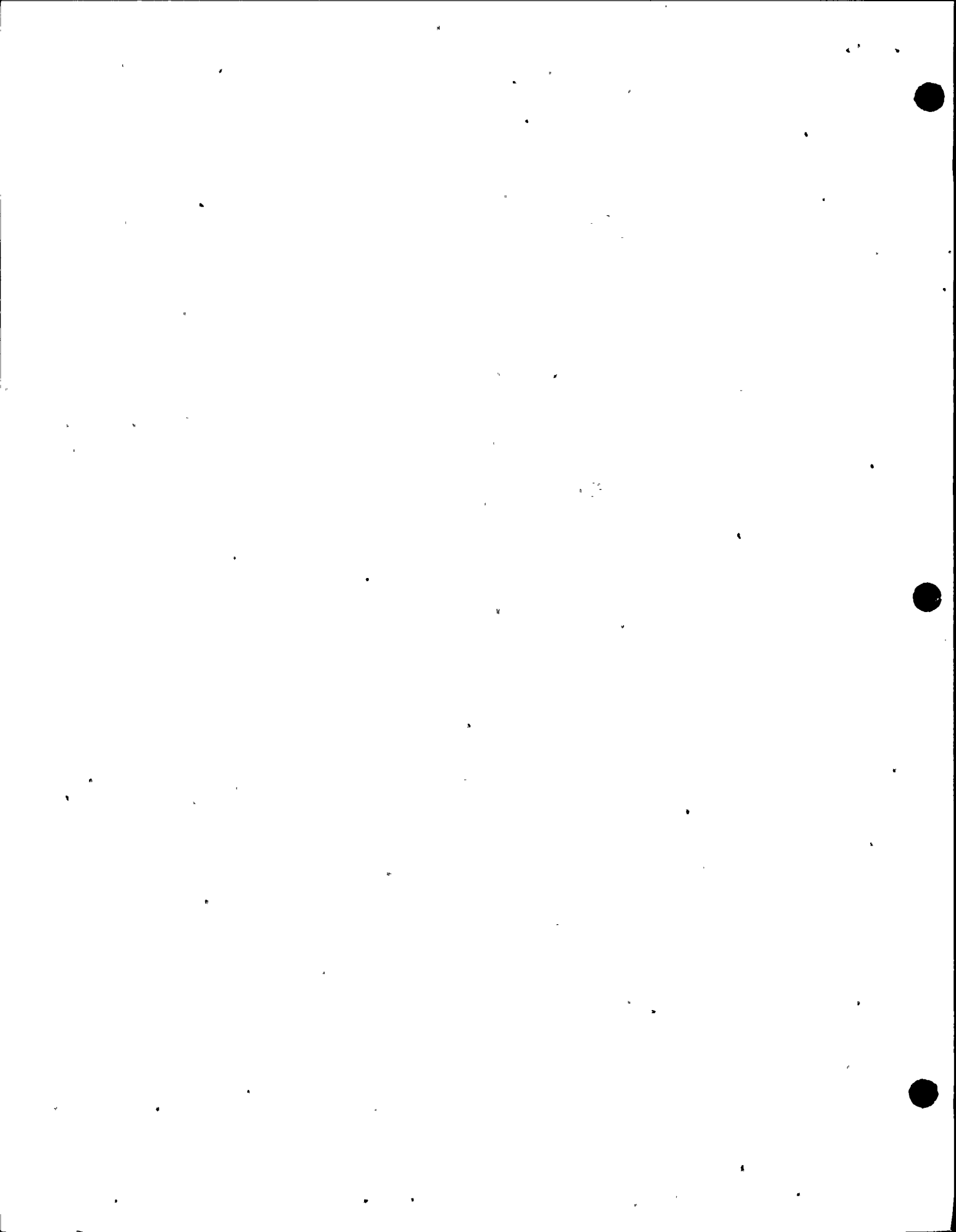
The licensee previously identified these inadequacies and has subsequently established a program for the review of facility procedures for the purpose of upgrading and revising to comply with the format and content recommended in ANSI N18.7. (Reference Detail 5)

This item is unresolved pending completion and implementation of the revised procedures.

8. Procedural Requirements for Revising, Changing and Upgrading Facility Procedures

The inspector performed an audit on a sampling basis of the following procedures.

- a. AP-1 Procedures for Administrative Controls
- b. AP-3 Site Operations Review Committee Procedures
- c. AP-7 Preparation, Review and Approval of Operating Procedures
- d. AP-11 Preparation, Review and Approval of Special Procedures
- e. AP-9 Procedure for Standing Orders
- f. AP-27 Procedure for Control of Station Repair and Maintenance



Based on review of the above procedures the inspector verified that the licensee has procedures for changing, revising and updating facility procedures including temporary changes thereto.

The inspector had no further questions in this area.

9. Review of Site Operations Review Committee (SORC) Meeting Minutes

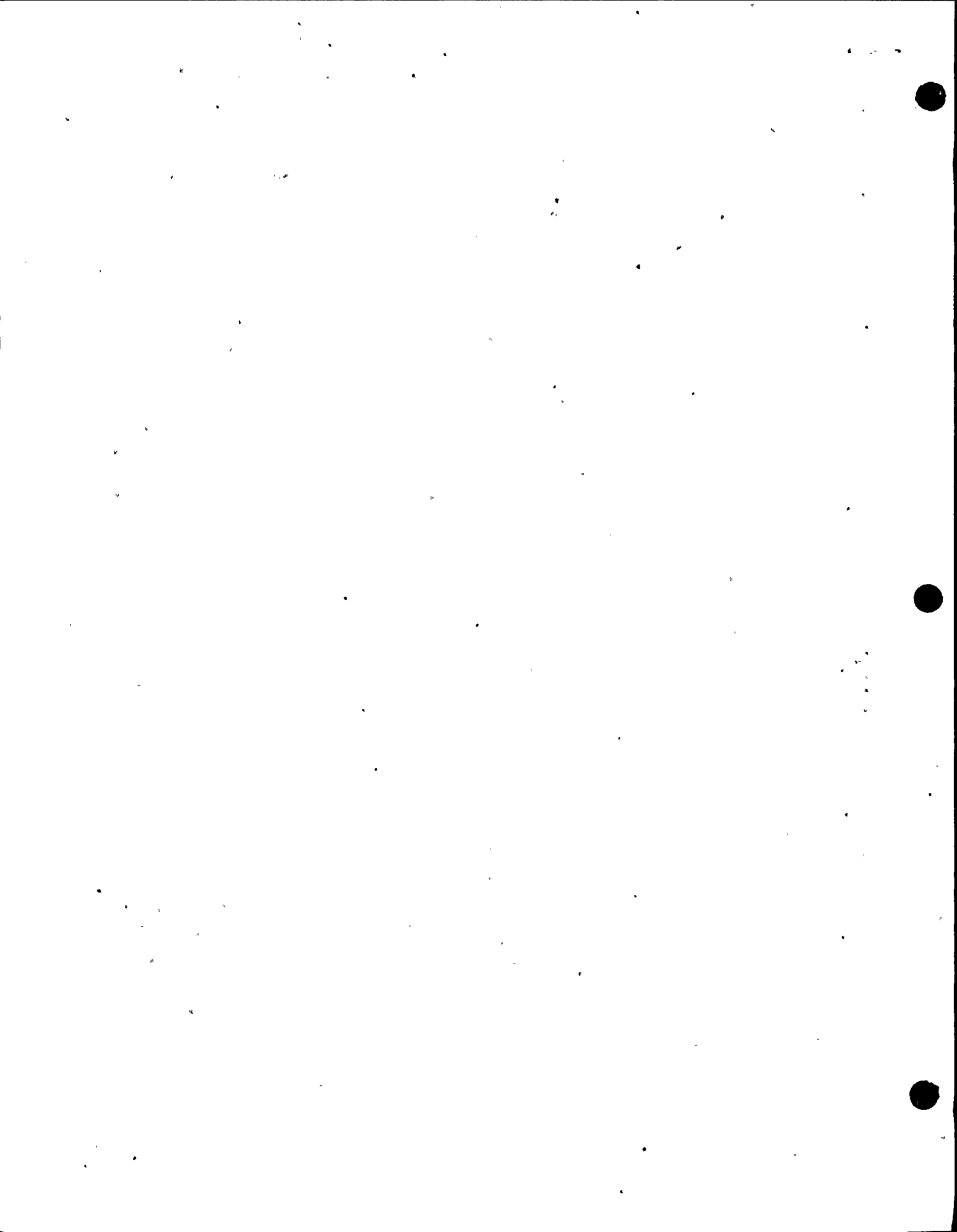
- a. The inspector performed a sampling audit of the SORC meeting and verified that the following items were in accordance with the requirements of the Technical Specifications, the licensee's administrative controls, and the guidelines set forth in ANSI N18.7 "Administrative Controls for Nuclear Power Plants."
 - (1) Committee membership
 - (2) Meeting frequencies
 - (3) Quorums
 - (4) Responsibilities
 - (5) Authorities
 - (6) Records
 - (7) Committee evaluations and recommendations
 - (8) Organizational membership

- b. The inspector reviewed SORC meeting minutes for the years 1974 and 1975, and verified that changes and revisions to procedures resulting from Technical Specification revisions, design changes, system or component modifications and procedure updating have been reviewed and approved in accordance with the requirements of the Technical Specifications and the licensee's administrative controls.

The inspector had no further questions in this area.

10. Document Control

- a. The inspector examined, on a sampling basis, the following procedures:
 - (1) OP-5 Control Rod Drive System Rev. 4 1/74
 - (2) OP-15 Condensate System Rev. 2 2/74
 - (3) OP-16 Feedwater System Rev. 3 2/74

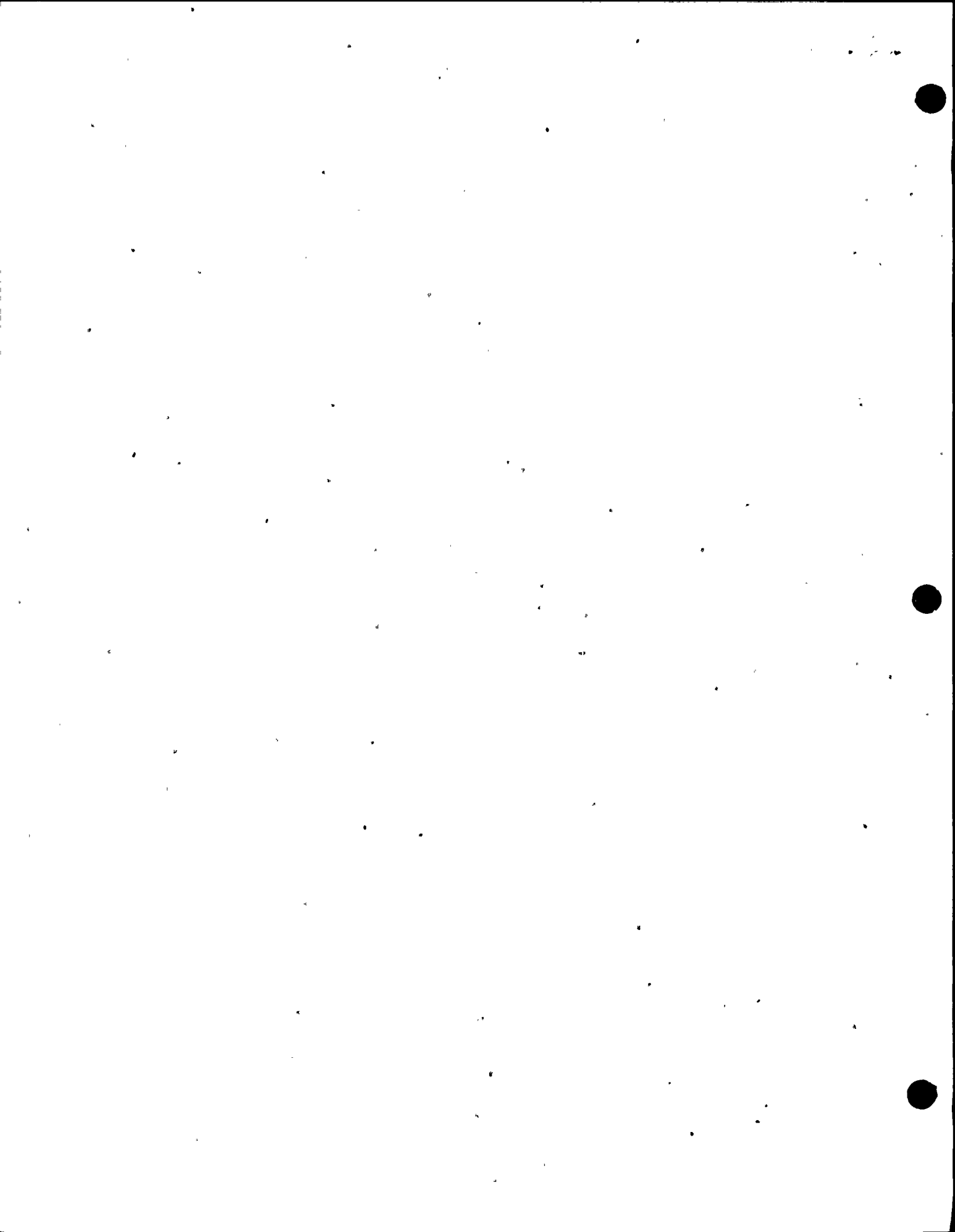


- (4) OP-19 Circulating Water System Rev.. 3 2/74
- (5) OP-43 Plant Startup and Shutdown Rev. 3 3/74
- (6) SP-4 Feedwater Malfunction (Increasing) Rev. 2 2/74
- (7) SP-6 115 KV Power Failure Rev. 0 8/74
- (8) SP-1 Loss of Coolant Rev. 1 10/73
- (9) SP-3 Feedwater Malfunction (Decreasing) Rev. 1 10/73
- (10) SP-7 D.C. Power Interruption Rev. 0 6/69
- (11) SP-9 Solenoid Actuated Pressure Relief Valve Opening
Rev. 1 12/74
- (12) SP-14 Loss of Service Water Cooling Rev. 1 5/75
- (13) SP-15 Malfunction of Control Rod Drive System Rev. 0 5/75
- (14) SP-16 Reactor Scram Rev. 0 5/75
- (15) SP-19 Unexplained Reactivity Change
- (16) SP-20 Loss of Condenser Vacuum Rev. 0 5/75
- (17) SP-23 Loss of Flux Indication Rev. 0 5/75

The inspector verified that the control room copies of the above operating and emergency procedures being utilized for the operation of the facility were the latest revision and were properly reviewed and approved by authorized management in accordance with the requirements of the Technical Specifications and the licensee's administrative controls.

The inspector had no further questions in this area.

- b. The inspector's review of Procedures AP-30 "Procedure for Technical Information File," AP-31 "Procedure for Maintenance of Plant Operating Historical Records," AP-36 "Maintenance of Quality Control Records," examination of records and discussions with the licensee verified that the station record retention requirements for operating records clearly identify the source, applicability, date, responsible persons and



duration of retention. The record retention system is centrally located with ease of traceability, retrievability and storage. No inadequacies were identified with respect to the licensee's Technical Specification requirements, administrative controls and A.S.I N18.7.

The inspector had no further questions in this area.

