

UNITED STATES
 ATOMIC ENERGY COMMISSION
 DIRECTORATE OF REGULATORY OPERATIONS
 REGION 1
 631 PARK AVENUE
 KING OF PRUSSIA, PENNSYLVANIA 19406

NOV 14 1973

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

Reference: Your letter dated September 13, 1973
 In response to our letter dated August 23, 1973

Gentlemen:

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

Your cooperation with us is appreciated.

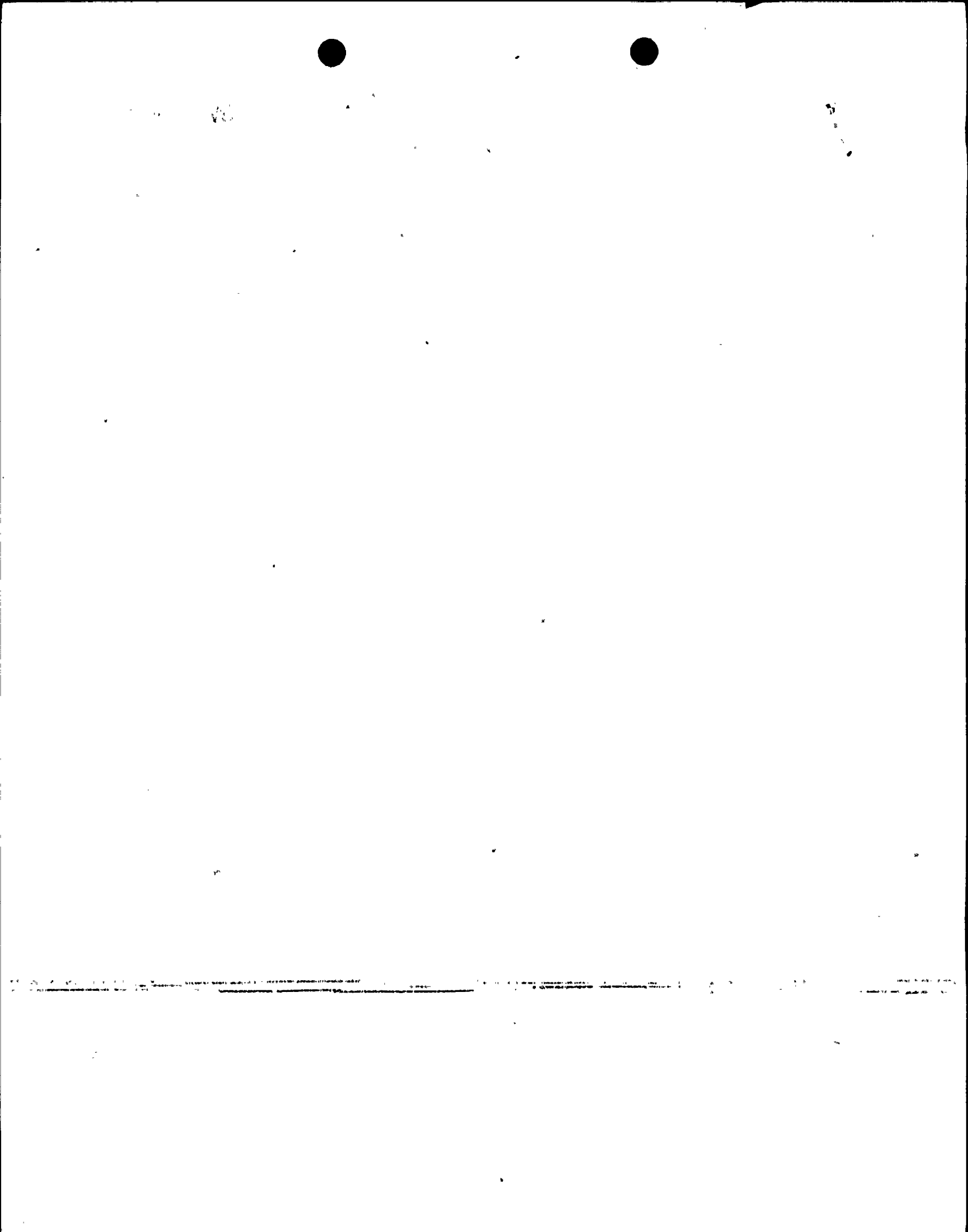
Sincerely,

James P. O'Reilly
 Director

bcc: RO, Chief FS&EB HQ
 RO:HQ (4)
 RO Files
 Central Mail & Files ✓
 Directorate of Licensing (4)
 PDR
 NSIC
 DTIE
 State of New York
Local PDR.

misc

OFFICE ▶	GRESS	<i>[Signature]</i>	<i>8/13</i>	<i>[Signature]</i>	<i>[Signature]</i>
SURNAME ▶	Plumlee/jy	Caphton	Brunner	O'Reilly	<i>[Signature]</i>
DATE ▶	<i>11/8/73</i>	<i>11/12</i>	<i>11/13</i>	<i>11/13</i>	



NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

300 ERIE BOULEVARD WEST
SYRACUSE, N.Y. 13202

September 13, 1973

Mr. James P. O'Reilly
Region I
Directorate of Regulatory Operations
United States Atomic Energy Commission
631 Park Avenue
King of Prussia, PA. 19406

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

Dear Mr. O'Reilly:

This letter is in reply to your letter received August 24, 1973 regarding the inspection conducted by Mr. Cantrell of your office on March 7-9, 28-30, 1973 at the Nine Mile Point Nuclear Station. The above mentioned letter also references the meeting held in Newark, N.J. on June 14, 1973 between Mr. O'Reilly and members of his staff and Mr. Haehl and other corporate representatives of Niagara Mohawk Power Corporation.

Following a thorough review of your letter we have concluded that no information contained in the inspection report is proprietary and it can be placed in the A.E.C.'s Public Document Room without changes.

In response to the concerns identified in your letters regarding actions taken or planned to improve the effectiveness of our management control system, we wish to advise you of the following activities, some of which were stated in my letter of July 5, 1973:¹

A number of conferences were held with Corporate management of the Company and Plant Supervision impressing upon the latter that the Technical Specifications must be adhered to in all circumstances whether limits requiring shutdown or administrative requirements.

Technical Specification changes to improve the Management Control of Plant Operations were submitted on June 7, 1973 and approved by letter on June 21, 1973.² Also plant reviews of Technical Specification regarding changes to enhance the accuracy of the methods of surveillance is underway. Corporate management of the Company has firmly impressed upon Plant Supervision that the proper course of action to be taken in determining a limiting condition for Operation is that as specified in the Technical Specifications. If an alternate method is better than the existing method then a change should be requested to the Technical Specification. In all cases the Technical Specifications that exist at that time must be followed.

¹ Ltr. Haehl to Kruesi-DRL July 5, 1973

² Ltr. Skovholt DRL - Raymond June 21, 1973



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Mr. James P. O'Reilly
U.S. Atomic Energy Commission

September 13, 1973

SORC minutes were expanded, then reviewed and attached to much more thorough SR&A Board minutes and forwarded to the required Management People. The SORC minutes will be numbered as an additional improvement in Management Control of Plant Operations.

As was stated in the meeting in Mr. O'Reilly's office, it is the intention of Niagara Mohawk's Management that Nine Mile Point Station shall be operated in full compliance with all A.E.C. Regulations and the Technical Specifications. The items concerning failure to report are for the most part the result of differing interpretations of what constitutes a reportable occurrence rather than an intent not to inform the commission.

Considerable reorganization of our Management was in progress, while your management audit was taking place (January, 1973). A letter dated March 12, 1973, from President James A. O'Neill, deceased, to Mr. L. Manning Muntzing, indicated the scope of these changes.

In addition, an expansion of the Quality Assurance and Quality Control Groups has been undertaken since your inspection. This includes: (1) A corporate level-Quality Assurance group reporting directly to the Executive Vice President; (2) Assignment of a Quality Control position at Nine Mile Point Site with the individual now stationed at the site and reporting to the General Superintendent of Nuclear Generation; (3) An additional expansion of the Quality Control Group at Nine Mile Point Site with selection of proper individuals now taking place; (4) Expansion of the Quality Control Group located in Syracuse.

The following are responses to each individual item as delineated by your enclosure:

ITEM A1

The four areas that were not posted as radiation areas were corrected on the spot at the time of the plant inspection. In addition the drain drum at the shutdown cooling system has been removed. Those individuals responsible for surveying and posting radiation areas have been refamiliarized with 10 CFR 20 requirements. Also a supervisor in the Radiochemistry and Radiation Protection group will survey the plant once per week to prevent reoccurrence of this item. As a result no areas now exist within the plant that are not now properly posted.

ITEM A2

On September 20, 1972 the primary means for determining reactor coolant system leakage rate indicated a value greater than 25 gpm. The primary method is monitoring the levels in the drywell floor drain and equipment drain tanks using probes within the tank. The time it takes for liquid to rise between the probes determines the rate of reactor coolant system leakage. However as the probes heatup the accuracy of the system deteriorates and reliance has been placed upon the integrated flow pumped from the sumps to the waste disposal system. Therefore the following corrective actions have been or will be taken:

- a. Corporate Management has had conferences with Plant Supervision and told them that the Technical Specification must and will be followed in all circumstances.



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September 13, 1973

- b. Revision to the Technical Specification governing Reactor Coolant Leakage Rate has been written and following necessary approvals will be submitted for approval by the Atomic Energy Commission. However until such time as this change is approved and incorporated strict adherence to the existing specification will be required.

Again it is the intention of Corporate Management that Nine Mile Point Station will be operated in full compliance with all AEC Regulations and the Technical Specifications. Full compliance with this item has been a fact since the incident. Although there has not been high drywell leakage since the 1973 Spring Refueling Outage, Plant Supervision appears to be much more aware of the necessity to abide by the limits as set forth in the Technical Specifications.

ITEM A3

This item concerns itself with the failure of Plant Supervision to recognize that the LCO (Item A2) had been reached or violated and therefore no reviews of the incident were made in the SORC meetings or reported in the SR&A Board. The Technical Specifications will no longer be a subject of interpretation. SORC will review any condition which may lead to an Abnormal Occurance to determine objectively the action needed. The method of determining the LCO and the surveillance associated with that item will be followed. Anytime an LCO is reached it will be reported, reviewed and necessary notifications made to Corporate Management and the Atomic Energy Commission. The SORC minutes which have been expanded will be reviewed in detail by the SR&A Board. The SR&A Board's review of the incident will be much greater depth and forwarded to appropriate Corporate Management Personnel. Since this incident a review of SORC and SR&A Board minutes shows improvement in reporting, review and depth of the reports. These reports will be critically monitored to assure that conformity to Technical Specifications is maintained.

ITEM A4

During the SORC meeting of February 10, 1973 discussion was held determining the course of action to be followed with control rod 30-23 stuck in the fully inserted position. General Electric was contacted and asked to furnish a recommendation for rod removal. The Unit was shutdown at the time therefore the control rod drive was replaced. Prior to replacing the control rod drive, however, the rod was withdrawn using a procedure furnished by G.E. That procedure was subsequently approved by SORC. As a result any time a control rod is stuck in the core this approved procedure will be used. In addition plant supervision has been notified by Corporate Management that all procedures must be approved prior to use. The expansion of the Q.A. and Q.C. Staff should provide necessary Management Controls to oversee adherence to the Technical Specifications.

ITEM B1

- a. In connection with this item the responses to Item A3 are appropriate, in that, Plant Supervision relied upon a method other than the primary one as specified in Technical Specification Bases 3.2.5. As a consequence of this action appropriate SORC and SR&A Board reviews were not accomplished and a letter to DRL stating the Abnormal Occurance was not written. The improvement of Management Control Systems as well as numerous conferences with Plant Supervision by Corporate Management will correct this situation.

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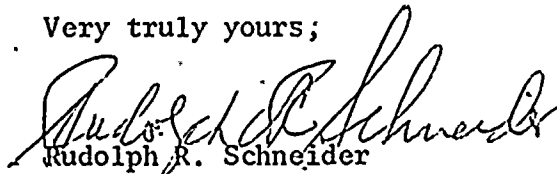
September 13, 1973

Results of these conferences has been rewarding in that full compliance has been achieved.

- b. In connection with this item a letter dated November 15, 1972 was sent supplying the required information. In addition those individuals responsible for analyzing and reviewing plant conditions have been refamiliarized with the Reporting Requirements. Full compliance has been achieved on this item.
- c. This item concerns the lack of safety analysis for the non-conservative change in set point of three of the four reactor triple low water level sensors in our letter of October 31, 1972 to Directorate of Licensing. In evaluating the safety consequences of this item there would have been no undue hazard presented to the general public as a result of 3 of 4 triple low level sensors being non-conservative. The remaining sensor would have fulfilled the necessary function. Full compliance has been achieved on this item.
- d. Regarding this item, inoperable control rods, in the future all inoperative control rods will be treated as an abnormal occurrence. At the present time no control rods are inoperable nor have any been inoperable since the 1973 spring refueling outage. Therefore full compliance has been achieved on this item.
- e. In connection with this item the corrective action taken included reviewing with operations the proper method to "rack in a breaker" as well as testing of all safety related equipment, its function and physical difficulties that could render that system inoperative. No problems have been experienced since then with this system and thorough complete training of operators none is expected. Full compliance has been achieved on this item.

Many of the items in B concern themselves with the need to review the reporting requirements with those people directly involved in these activities. These reviews have been completed and thru audits the reporting, review and analysis will be kept at a high level. Special forms are being prepared to maintain records of all occurrences. These forms will be made available to all departments in order to streamline the reporting process. In addition the comprehensive review by SORC members of reports should aid in achieving the desired and necessary level of correspondence on these matters.

Very truly yours;



Rudolph R. Schneider
Vice President - Electric Operations

RRS:cm

