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

Region I

Report No. <u>50-220/79-06</u>	۱.
Docket No. 50-220	
License No. DPR-63 Priority	Category <u> C</u>
Licensee: <u>Niagara Mohawk Power Corporation</u>	
300 Erie Boulevard, West	
Syracuse, New York 13202	
Facility Name: <u>Nine Mile Point Nuclear Station</u> , Unit 1	·
Inspection at: Scriba, New York	,
Inspection conducted: March 5-8, 1979	
Inspectors: George Kalman	4/2/79
G. Kalman, Reactor Inspector	
T. Smith, Reactor Inspector	date signed
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Approved by Alla Cartelina	child Fra
D. L. Caphton, Chief, Nuclear Support	date signed
Section 2, RUANS Branch	
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Inspection Summary:

Inspection on March 5-8, 1979, Report No. 50-220/79-06) Areas Inspected: Routine, unannounced inspection by regional based inspectors of preparations for refueling, refueling outage related maintenance and surveillance, pipe supports and restraints, and licensee action on previous inspection findings. The inspection involved 53 inspector-hours onsite by two NRC regional based inspectors.

Results: Of the six areas inspected, no items of noncompliance were identified in five areas and one item of noncompliance was identified in one area (Deficiency - failure to follow procedures, paragraph 7.c).



Region I Form 12 (Rev. April 77)

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DETAILS

1. Persons Contacted

- *Mr. R. Abbott, Maintenance Superintendent
- Mr. W. Drews, Asst. Supervisor Reactor Analyst
- Mr. F. Hawksley, Technical Assistant to Station Superintendent
 - Mr. M. Meehan, Asst. to General Superintendent
- *Mr. T. Perkins, Station Superintendent
- *Mr. M. Silliman, Results Superintendent
- Mr. C. Stuart, Operations Supervisor

The inspectors also interviewed other licensee and contractor personnel.

* denotes those present at the exit interview.

2. Licensee Action on Previous Inspection Findings

(Open) Unresolved item (220/77-04-03): The snubber test procedure has not been revised to include the requirement to select a representative sample of snubbers for functional testing. Licensee representatives stated that the snubbers selected for functional testing during the current refueling outage would constitute a representative sample and that the procedure would be revised to include this requirement prior to the next refueling.

(Open) Unresolved item (220/79-03-01): The below items associated with the Type A test procedure were collectively designated as item (220/79-03-01). The inspector reviewed Instrument Surveillance Procedure NI-ISP-IC-23 "Integrated Leak Rate Test of Primary Containment PCILRT (Type A Test)," (Draft 4 dated March 6, 1979). The status of each of the items is indicated below.

- a. Volume Weighting Factors: The procedure presently specifies how volume weighting factors will be reassigned if instrumentation becomes inoperative. This item is considered to be resolved.
- b. Dew Point Instrumentation: Justification has been made for four rather than six dew point instruments based on discussions between the licensee and the testing contractor. This item is considered to be resolved.

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- c. Containment Volume: Paragraph 5.1.1 has been revised to reflect the correct containment volume. This item is considered to be resolved.
- d. Calibration Corrections: The revised procedure requires that instrument calibration curve correction factors be applied to each sensor data point prior to using the point in the leak rate calculation. This item is considered to be resolved.
- e. Atmospheric Conditions: The procedure has been revised to require the recording of data as specified in ANSI N45.4. This item is considered to be resolved.
- f. Technical Specifications: A technical specification change, to allow an 8 hour test, has been submitted. (Open)
- g. Verification Test Criteria: The verification test acceptance criteria as stated in the revised procedure conforms to the requirements of 10 CFR 50 Appendix J. This item is considered to be resolved.
- h. Pressure Switches: The procedure has been revised to require that high drywell pressure switches be electrically defeated rather than mechanically isolated from the containment. This item is considered to be resolved.
- i. Data Rejection: Acceptable data rejection criteria has been incorporated in the revised procedure. This item is considered to be resolved.

(Open) Unresolved item (220/79-03-02): The below items associated with the valve lineup portion of the Type A test procedure were collectively designated as item (220/79-03-02). The status of each of the items is indicated below.

- a. Main Steam Line Penetration: The main steam line penetration valve lineup has been revised. The artifical leak path has been corrected. This item is considered to be resolved.
- b. Drywell and Recirculation Pump Cooling Penetrations: The licensee is investigating the design of the above systems in order to determine if they must be vented and drained during the Type A test. (Open)



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- c. Containment Sampling Penetrations: Valve lineups for these penetrations have been provided. This item is considered to be resolved.
- d. Feedwater and Liquid Poison Penetrations: These valve lineups have been revised to ensure that a vent path has been provided. This item is considered to be resolved.

3.' IE Bulletin Followup

The inspector reviewed IE Bulletin No. 78-09 "BWR Drywell Leakage Paths Associated with Inadequate Drywell Closures," and the Niagara Mohawk response letter NMP-0178 dated July 28, 1978. In essence, Bulletin 78-09 states that the procedure used to reinstall the drywell head must ensure it is reinstalled exactly the same as the installation immediately preceding the last successful Containment Integrated Leak Rate Test (CILRT). Maintenance Procedure No. MP-1.8 "Installation of Containment Head" does not presently require that any of the parameters mentioned in the Bulletin be measured to ensure repeatable closures. A licensee's representative has committed to change MP-1.8 to require the use of a feeler gage to ensure head flange metal to metal contact upon completion of tightening the head bolts. The change will be in effect prior to the next head installation. Pending review of the revised procedure this item is open.

4. Refueling Preparations

a. Reactor Disassembly

The inspector reviewed the following procedures and witnessed the preparations for removal of the reactor vessel head.

- -- Maintenance Procedure MP-1.1 "Removal of Containment Head," Revision 2, dated March 2, 1979.
- -- Maintenance Procedure MP-1.2 "Removal of Reactor Vessel Head," Revision 2, dated March 2, 1979.
- -- Maintenance Procedure MP-1.3 "Removal of Reactor Vessel Steam Dryer," Revision 2, dated March 2, 1979.
- -- Maintenance Procedure MP-1.4 "Removal of Reactor Vessel Moisture Separator," Revision 2, dated March 2, 1979.

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Personnel involved were properly qualified, work was being conducted using the proper procedure, and equipment removed during the disassembly was being properly stored and protected from damage. The inspector had no further questions in this area.

b. Fuel Handling

The inspector reviewed "Fuel Handling Procedure No. 25," NI-FHP-25, Revision O, dated February 1977, and the 1979 Offload and Reload sequence procedures: It was determined that refueling related Technical Specification requirements were properly addressed in this procedure. The inspector had no further questions in this area.

c. Fuel Receipt and Inspection

Procedures and reports related to the receipt and inspection of 184 fuel assemblies and fuel channels were reviewed. The review encompassed licensee and fuel vendor records: Licensee fuel inspector qualification records were checked. The inspector had no further questions in this area.

d. <u>Core Alteration Supervision</u>

It was noted by the inspector in reviewing the refueling procedures that core alterations would not be under the direct supervision of a Licensed Senior Reactor Operator. The inspector informed the licensee's representative of the NRC position as stated in the Standard Technical Specifications, that core alterations shall be under the direct supervision of a Licensed Senior Reactor Operator who has no other concurrent responsibilities. This subject will receive further NRC review.

5. Maintenance Activities

a. Scope

The inspector reviewed documentation related to two plant modifications scheduled to be completed during the current refueling outage. The documents were reviewed for completeness in description of the scope of the modifications and the adequacy of the safety reviews conducted as required by 10 CFR 50.59.

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b. Documents Reviewed

- Modification:N1-78.17, "Piping Replacements and/or Modifications Inside the Drywell"
- Modification N1-79.02, "Torus Modification."
- c. Findings

No discrepancies were identified.

6. <u>Surveillance</u>

The inspector reviewed the current draft of the Type A test procedure. All inspector concerns were discussed in previous inspection findings and are updated in Paragraph 2 of this report.

The inspector also reviewed the Core Spray Surveillance Test N1-ST-R9, Revision 1, dated September 1978. The inspector verified that the procedure satisfied the applicable requirements in the Technical Specifications.

Except as noted above no discrepancies were identified and the inspector had no further questions in these areas at this time.

7. <u>Pipe Support and Restraint Systems</u>

a. <u>Scope</u>

Licensee procedures and surveillance records related to pipe support and restraint systems were reviewed. The inspector conducted an independent visual inspection of pipe supports and restraints including an inspection of normally inaccessible snubbers located in the drywell. Snubber functional test preparations and pipe support related inservice inspection operations were observed.

b. Documents Reviewed

-- N1-MST-R-3, Revision 0, "Hydraulic Snubber Functional Test," including test results obtained during the 1977 refueling outage.



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- N1-MST-V1, Revision 2, "Hydraulic Snubber Visual Inspection" including data obtained from inspections conducted in May 1977, July 1977, October 1977, and May 1978.

"Inservice Inspection Ten-Year Program Plan Book" including a random sample of pipe support inspection results.

c. Findings

All snubbers and pipe supports examined by the inspector appeared operable. Minor discrepancies were brought to the attention of licensee personnel.

The hydraulic snubber visual inspection procedure includes the requirement to record cold snubber piston settings, however, no acceptance criteria are specified to ensure that the cold piston settings are within a range which would allow for thermal expansion. The inspector did review a table which included a listing of acceptable cold piston settings for inaccessible snubbers. The licensee's representative stated that this table had been used during the inspection process. Licensee representatives agreed to revise the visual inspection procedure to reference this table and to expand the table to include acceptable piston settings for accessible snubbers. This item will be examined during a subsequent inspection (220/79-06+01).

The review of visual snubber inspection reports revealed that the snubber inspection performed on July 10, 1977 had not been documented in accordance with procedural requirements. The visual snubber inspection procedure requires: 1) data sheets to be filled out for each snubber; 2) sign-off by the individual performing the inspection; 3) review and sign-off by the foreman; 4) review and sign-off by the maintenance supervisor.

On July 10, 1977, inaccessible snubbers were inspected by the maintenance supervisor and the inspection results for the 86 snubbers were documented by the maintenance supervisor with a statement that all snubbers were inspected and were found operable. There was no indication that anyone else had reviewed the inspection results. Inspector review of additional documents, personnel interviews, and independent inspection appeared to verify that the snubber inspections had been performed, however, failure to follow procedural requirements to complete data sheets and the subsequent failure to review the inspection results is an item of noncompliance (220/79-06-02).

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The inspectors noted that several safety related snubbers located in the drywell were not included in the Technical Specification (T.S.) listing. In accordance with T.S. 3.6.4.e, the listing in the T.S. needs to be updated in conjunction with a subsequent license amendment request. The licensee's action will be reviewed during a future inspection (220/79-06-03).

8. Exit Interview

On March 8, 1979, at the conclusion of the inspection, the inspectors met with the licensee representatives denoted in Paragraph 1. The scope and findings of this inspection were discussed. The licensee acknowledged the findings.

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