

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:7908070657 DOC.DATE: 79/08/03 NOTARIZED: NO DOCKET #
 FACIL:50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Powe 05000220
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 BARTLETT,J. Niagara Mohawk Power Corp.
 RECIP.NAME RECIPIENT AFFILIATION
 IPPOLITO,T.A. Operating Reactors Branch 3

SUBJECT: Forwards addl info in response to IE Bulletin 79-08 re review of TMI-2 events, redundant instrumentation to determine reactor coolant inventory, procedures involved in overriding automatic safety actions & valve check off lists.

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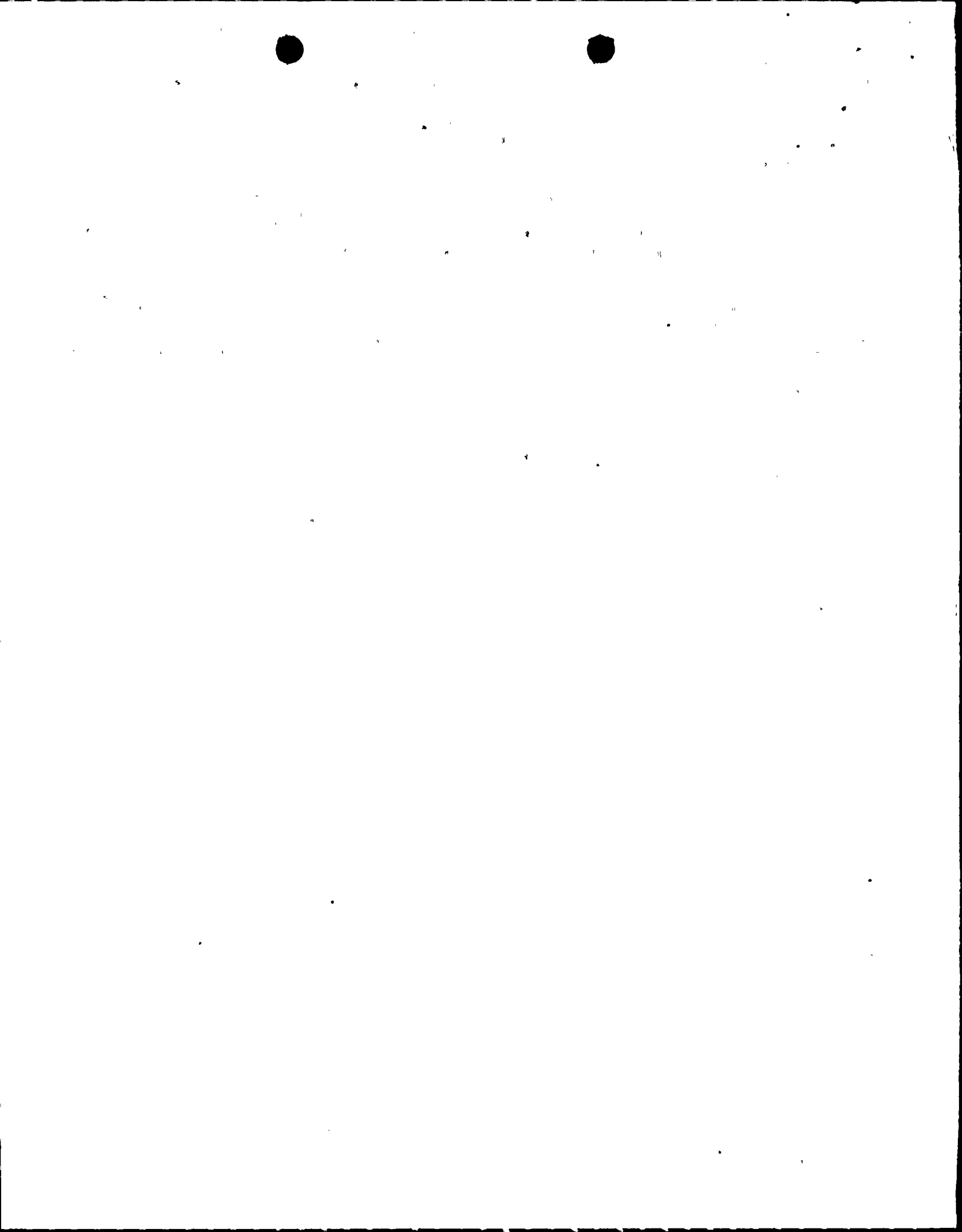
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August 3, 1979

Director of Nuclear Reactor Regulation
Attention: Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch #3
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket 50-220
DPR-63

Gentlemen:

Your letter of July 20, 1979 requested additional information concerning our response to Inspection and Enforcement Bulletin 79-08. The attachment to this letter addresses those concerns.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



James Bartlett
Executive Vice President

Attachment

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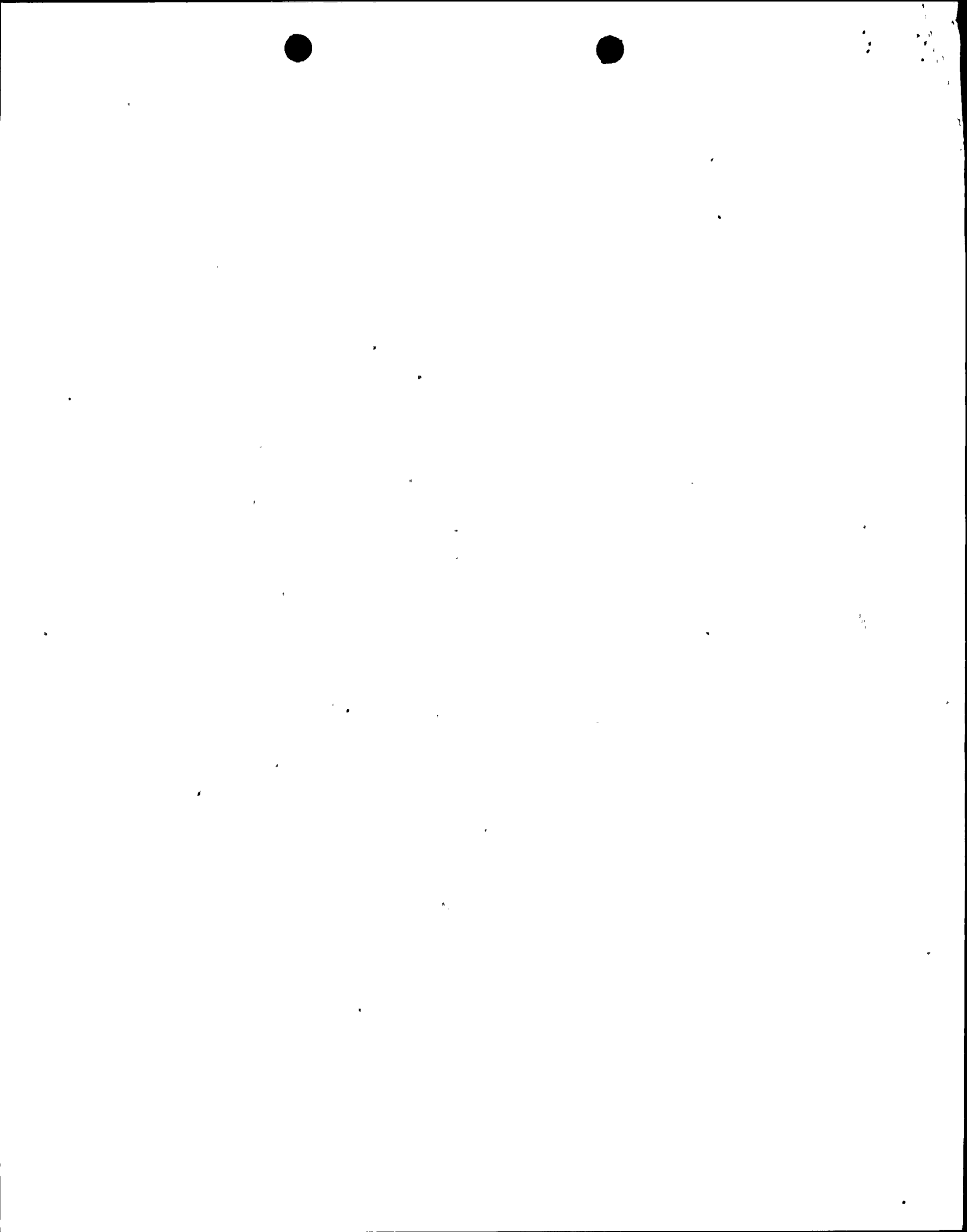
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Item #1

Confirm that all licensed operators, plant management and supervisors with operational responsibilities have completed the review of TMI-2 events required by Item 1 of IEB 79-08 and that their participation has been documented in plant records.

RESPONSE

All licensed operators, plant management and supervisors with operational responsibilities have completed a review of the TMI-2 events; this participation is documented in the Station's Training Records.



Item #2

1. Clarify your response to indicate whether your review included all lines penetrating containment. Provide the schedule for any additional review if needed.

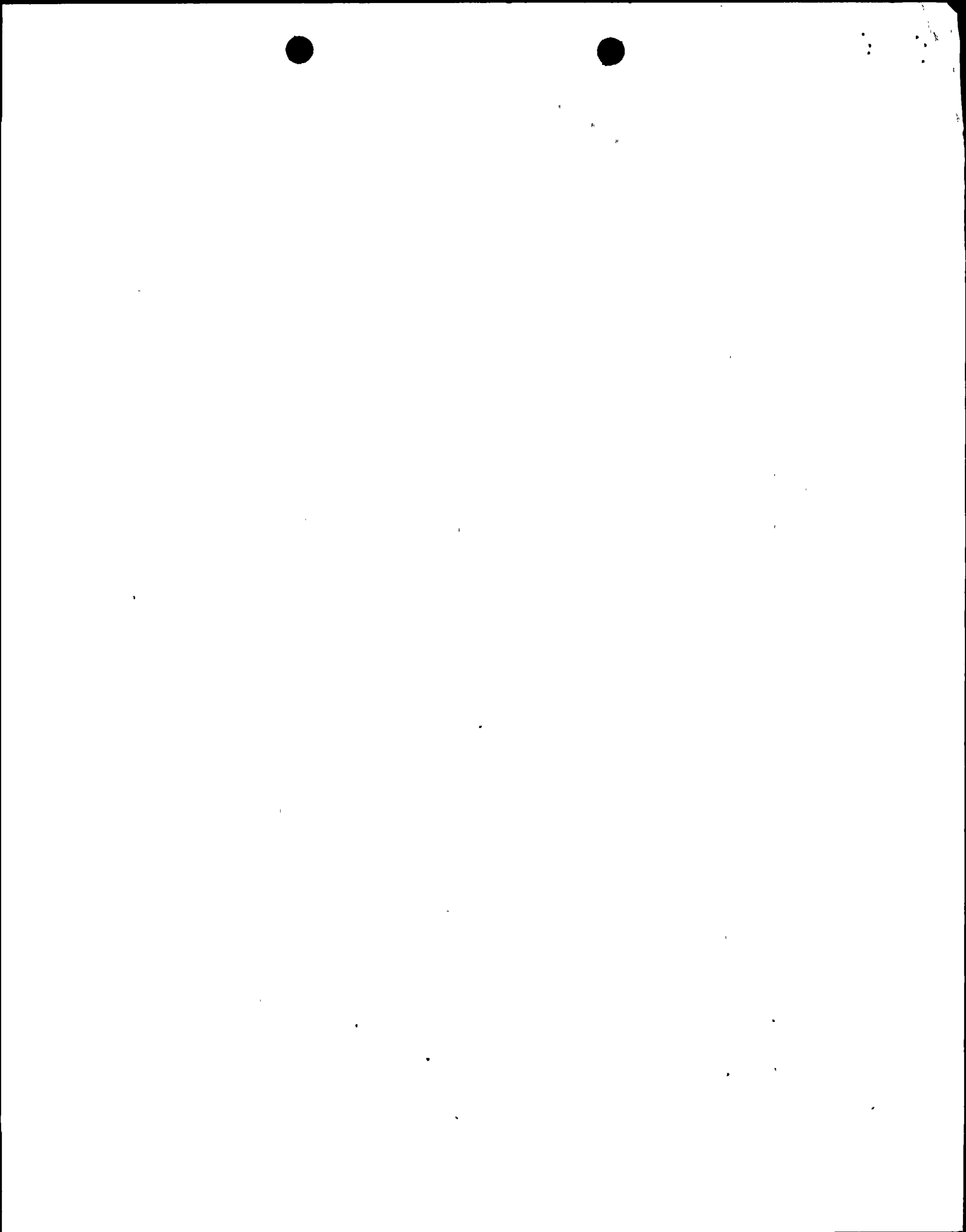
RESPONSE

Our review included all lines which penetrate the primary containment. However, in certain instances, such as the recirculation sample line to the reactor building, isolation did not occur. A further review is in progress with completion scheduled for September 1, 1979.

2. The recirculation sample line to the reactor building should be isolated on all automatic initiations of safety injection in order to prevent inadvertent transfer of radioactive liquid out of containment. Your decision to add isolation valves in early 1981 is acceptable; however, your use of administrative procedures in the interim to assure closing of this line after use is unacceptable. Therefore it is our position that you should review and modify all applicable procedures to assure proper isolation of this line until the design modification is complete. Provide a schedule for the implementation of any new or modified procedures resulting from this review and discuss how these new or modified procedures will permit compliance with the bulletin requirements,

RESPONSE

Sampling Procedure N1-SP-11, "Reactor Water Sampling with Reactor Cleanup System Isolated" ensures that if a reactor coolant isolation signal is obtained the valve will be immediately closed by the member of the operating staff taking the sample.



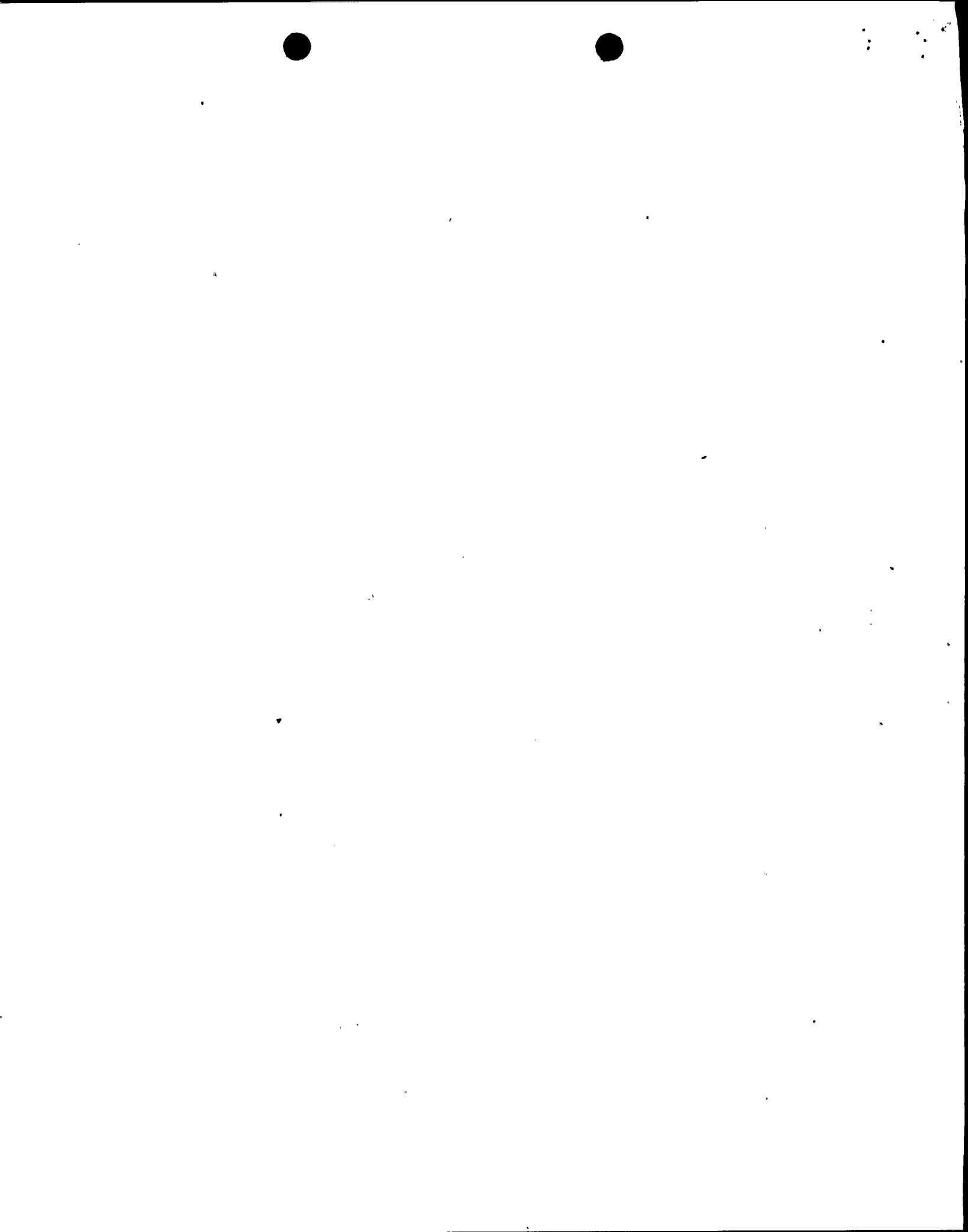
Item 4

1. Describe other redundant instrumentation which the operator might have to determine changes in reactor coolant inventory, e.g., drywell high pressure, radioactivity levels, suppression pool high temperature, containment sump pump operation, etc.

RESPONSE

Control Room operator has many other sources of information that would assist in determining changes in reactor coolant inventory:

<u>Parameter</u>	<u>Instr. Type</u>	<u>Alarm</u>
Drywell Temp	T/C (3)	High temperature alarms
Torus H ₂ O Temp	T/C (3)	High temperature alarm
Torus Pressure	P/T	High pressure alarm
Torus H ₂ O Level	L/T	High level alarm
Drywell Pressure	P/T	High pressure alarm
Drywell-Torus dP	DPT	High/Low alarm
Drywell CAM (Continuous Airborne Monitor)		High CPM Alarm
DW Equip Drain Tank	Leak rate monitors	- gpm - Rate of Rise
DW Floor Drain Tank	Leak rate monitors	- gpm - Rate of Rise
		Leak rate alarms on both systems



Item 4

2. Clarify your response to indicate whether operators have been instructed to utilize other available information to initiate safety systems. Provide your schedule for completion of this action.

RESPONSE

In our response to I.E. Bulletin 79-08, dated April 24, 1979, Item 1.b, we indicated the instruction to operators not to override automatic action of safety actuation and to use redundant instrumentation. Additionally, our response to Item 5(a) covered this same area of concern. Site Administrative Procedure APN-2A has been expanded and clarified to ensure that the conduct of shift operation is in accordance with these philosophies. Specifically, Section 1.6.1 reads "The Operations Supervisor, Station Shift Supervisor and station operators shall be trained and qualified in accordance with 10CFR-55 and as outlined in APN-10. As repeated under each duty description below, all operations shall be conducted in accordance with approved procedures. Under all circumstances operators shall be guided by redundant or corroborating instrumentation when available and in the absence of other definite operational evidence, they shall always believe instrument indications. No automatic engineered safety feature shall be manually overridden unless there is sufficient operational or instrumented evidence to show that the system is not performing its intended function and is operating so that continued operation will prolong or produce an unsafe condition. Restoration of systems to normal shall be at the direction of the Station Shift Supervisor only after it is established that the station is in an acceptable condition for normal operation." This action is therefore complete.



Item 5

1. It is not clear from your response whether your review of procedures with respect to the actions directed by items 5a and 5b included all operating procedures and training instructions. Amend your response to clarify this point.

RESPONSE

All safety related Operating Procedures and Special Operating Procedures have been reviewed for the areas of concern, i.e., overriding automatic safety actions and use of redundant instrumentation. The changes required to these procedures have been accomplished. Nine Mile Point does not have formal training instructions except for APN-10 "Training Procedures" which detail the requirements for and program used in training the operations department personnel. The Site Training Group does however stress this subject during the operator requalification program.

2. Your response to item 5a did not address the matter of unsafe plant conditions. Amend your response to address this matter.

RESPONSE

See response to Item 4, Question #2, i.e., APN-2A, Section 1.6.1. Action required by item 5 a & b is complete.



Item 6

1. Please augment your response to indicate the extent to which position and locking device checks are performed for locked safety system valves.

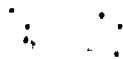
RESPONSE

The valve check-off lists (valve line-ups) for safety related valves include not only the required position but further defines if that valve is required to be locked open or closed for system operability. When performing a system valve line up the operator must check that the valve is in its proper position as well as locked if required and document this on the check-off list.

2. Your response did not clearly indicate that all accessible safety-related valves had been inspected to verify proper position. Nor was a schedule for performing the position verification for all safety-related valves provided. Please supplement your response to provide this information.

RESPONSE

All safety-related systems were lined up in accordance with their valve check-off list prior to start-up after refueling in June 1979. Additionally, system operability surveillance tests were also performed.



Item 7

1. We require clarification of your response with regard to valve action on resetting of safety features instrumentation. You stated that the drywell high pressure signal that initiates containment isolation has a seal-in feature requiring that both RPS channels be cleared and manual reset accomplished in order to allow opening of the drywell drain valves. Your response did not address the action of the drywell drain valves and other valves on resetting of safety features instrumentation when containment isolation is initiated by low-low reactor vessel water level. Amend your response to address this matter.

RESPONSE

When containment isolation is initiated by low-low reactor vessel water there is no seal in feature. However, a manual reset must be accomplished before any isolation valves can be manually re-opened from the control room.

2. Discuss the basis on which continued operability of the features designed to prevent inadvertent transfer of radioactive gases and liquids is assured.

RESPONSE

Procedures are presently in place which would preclude the inadvertent transfer of highly radioactive gases following an isolation event. However, procedures to preclude the inadvertent transfer of highly radioactive liquids after an isolation event will be implemented by August 15, 1979.



Item 8

1. We understand from your response that operability tests are performed on redundant safety related systems prior to removal of any safety related system from service. Since you may be relying on prior operability verification within the current technical specification surveillance interval, operability should be further verified by at least a visual check of the system status to the extent practicable, prior to removing the redundant equipment from service. Please supplement your response to provide a commitment that you will revise your maintenance and test procedures to adopt this position.

RESPONSE

Nine Mile Point #1 practice has always been to run an immediate operability test on safety system redundant components prior to removing a component for maintenance. We do not rely on prior operability tests within the technical specifications surveillance schedule for verification of system performance, and therefore, a revision to our maintenance and test schedule is not required.

2. It is not clear from your response that all involved reactor operational personnel in the oncoming shift are explicitly notified about the status of systems removed from or returned to service. Please indicate how this information is transferred at shift turnover.

RESPONSE

Section 2.6 of APN-2A Site Administrative Procedures "Conduct of Operations and Composition and Responsibilities of Station or Unit Organization" requires "...a verbal exchange of information between shifts which must include the status of safety related equipment and conditions, as set forth in the technical specifications".



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Item 9

Amend your response to assure that your procedures stipulate NRC notification any time "the reactor is not in a controlled or expected condition".

RESPONSE

The change to APN-21 described in our response dated 24 April 1979, does contain the notification requirement any time "the reactor is not in a controlled or expected condition".



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