

October 2, 1979

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

RE: Docket No. 50-220
Inspection Report 79-21

Dear Mr. Brunner:

This refers to the inspection conducted by Mr. R. Architzel of your office on June 11-15 and July 16-20, 1979, at the Nine Mile Point Nuclear Station Unit #1. The following is submitted in response to the alleged infractions detailed in Appendix A of your letter dated September 12, 1979:

- A. Technical Specification 6.8.1 states, in part, that: "Written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the requirements and recommendations of ... Appendix "A" of USNRC Regulatory Guide 1.33,..."

USNRC Regulatory Guide 1.33, Appendix A, requires procedures to cover the following activities: "A.3, Equipment Control (e.g., locking and tagging); D.7, Emergency Core Cooling System; and D.2, Control Rod Drive System."

Contrary to the above, the following valves were found to be not locked as required by system operating procedures and/or P&ID's when checked between June 11 and July 20, 1979:

- Emergency Cooling Drain Valves EC701, 703, 705, and 707.
- Containment Spray System Containment Isolation Valves Drain Valves.
- Control Rod Drive Filter Blocking Valve CRD 8 or 9 (out of service locked closed).

RESPONSE

Emergency Cooling Drain Valves EC 701, 703, 705, and 707 and Containment Spray System Isolation Drain Valves have been locked as required.

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RESPONSE TO ITEM A (continued)

Control Rod Drive Filter Blocking Valves CRD 8 and 9 (out of service locked closed): The normal operating position for these valves is open; P&ID 18016 (Rev. 3) shows both to be normally open, however, Valve Check-Off List (VCOL) is incorrect and must be modified. The VCOL and the P&ID are being reviewed against "as built" and operating conditions and shall be revised accordingly. These actions, to be completed by January 1, 1980, will achieve full compliance for this item and will preclude future problems of this nature.

- B. 10 CFR 50, Appendix B, Criterion XIV, Inspection, Test and Operating Status, states in part: "Measures shall be established to indicate, by the use of markings such as stamps, tags, labels, routing cards, or other suitable means, the status of inspections and tests performed upon individual items of the nuclear power plant... Measures shall also be established for indicating the operating status of structures, systems, and components of the nuclear power plant... such as by tagging valves and switches, to prevent inadvertent operation."

The licensee's approved Quality Assurance Program, FSAR Amendment XIV, states, in part: "For Nine Mile Point - Unit 1, the licensee maintains a system which ensures that the operational status of systems and components is known at all times... Equipment is governed by procedures which require the use of suitable unambiguous labeling showing existing status, tests passed, and tests still required as appropriate."

Contrary to the above, the following examples of failure to adequately label valves were identified during the conduct of the inspection. These valves are required to be position verified prior to restart from refueling outages.

- Valve FS-45 (Emergency Condenser Makeup Tank Supply from the Fire Protection System) was labeled FS-44.

Valve FS-45 (Emergency Condenser Makeup Tank Supply from Fire Protection System) has been labeled correctly.

- Two Liquid Poison System Valves were assigned the same number, LP-711.

Labeling error on Liquid Poison System (two valves labeled LP-711) has been corrected.

- The Demineralized Water supplies to the Liquid Poison Pump and Test Tank were assigned two different numbers.

The Demineralizer Water Supply Valve to Liquid Poison Pump and Test Tank has been labeled with one number.

- The Diesel Generator Air Start Valves were not labeled.

Diesel Generator Air Start Valves are now labeled.

- Sixty-five vent and drain valves in the Containment Spray System were not labeled.

Labeling of the vent and drain valves in the Containment Spray System is in progress, and will be completed by October 31, 1979.

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- B. -- The Reactor Building Ventilation Dampers and valves were not labeled.

Labeling of the Reactor Building Ventilation Dampers and valves is in progress, and will be completed by October 31, 1979.

- C. 10 CFR 50, Appendix B, Criterion XVII, Quality Assurance Records, states, in part: "Sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include at least the... results of reviews, inspections, tests,... Inspection and test records shall, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted..."

The licensee's approved Quality Assurance Program, FSAR Amendment 12, states, in part:

"17.6 Inspection and Test Records

Records of inspection and test include, as applicable, the date, identity, or signature of the inspection or data recorder, the type of observation, the identification of equipment or part inspected, the identification of test equipment utilized, the observer's results, the acceptability of the results, and the action taken to resolve the deficiencies."

Contrary to the above, the Shutdown Cooling Pumps Numbers 11, 12, and 13, Casing Vent Valves SC-303, 304, 305, 306, 307, and 309, were documented checked as closed on June 17, 1979 as per procedure N1-OP-4, Shutdown Cooling and Head Spray, Revision 6, when the valves were not installed in the system. No deficiencies were noted on the valve lineup.

RESPONSE

The casing vent valves are not installed. Revised P&ID's and VCOL's will be issued by January 1, 1980.

- D. 10 CFR 50, Appendix B, Criterion VI, Document Control, states, in part: "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..."

The licensee's approved Quality Assurance Program, FSAR Amendment No. 12, states, in part:

"6.2 Document Control

The measures which control the issuance and revision of these documents require:

- (a) The review of controlled documents for accuracy..."

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D. Continued


Contrary to the above, examination of drawings and systems between June 11 and July 20, 1979, demonstrated that measures were not effective in issuing the following drawings affecting quality in that the as built condition was not depicted on the respective drawing as indicated:

- Drawing C-18017-C, Emergency Cooling System, Revision 7: Two check valves shown installed on the loop 11 and 12 vent lines to Main Steam were not installed. Two manual block valves were installed on this line, not shown. The drain valve configuration on the reactor side of IV's 39-09 and 10 was missing one of two installed valves in the drawing.
- Drawing C-18019-C, Reactor Liquid Poison System, Revision 6: The drawing did not incorporate an installed flow switch upstream of valve LP-12.
- Drawing C-18007-C, Reactor Core Spray, Revision 9: A vent valve and open ended pipe were installed outside the containment on the reactor side of Isolation Valve (IV) 40-05, but not shown on the drawing. Check valves CRS 15 and 16 were not installed in the system as configured. Three drain valves installed on CRS-11, Bypass Isolation Valve, were not shown on the drawing.
- Drawing C-18012-C, Reactor Containment Spray, Revision 7: Eight vent valves were shown installed on IV operator shafts.
- Drawing C-18013-C, Reactor Building Heatup Cooling and Ventilation Systems, Revision 5: The drawing showed one valve in the suction line to the Reactor Building Exhaust airborne monitor. Four valves were installed in two different suction paths.
- Drawing C-18016-C, Control Rod Drive, Revision 3: Two valves in the process flow path (between block valves CRD 8 and 9 and the respective Drive Water Filters) were not shown on the drawing.

RESPONSE

Each of the systems listed in this noncompliance have been assigned to a Station Shift Supervisor; he has the responsibility to perform an "as built" inspection of the assigned system to ensure that the P&ID and the VCOL are correct and to identify and propose any changes to these documents he deems appropriate. Such changes will be reviewed by the Site Operations Review Committee and revisions issued by January 1, 1980.

Very truly yours,


R.R. Schneider
Vice President -
Electric Production

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