

November 4, 1980

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 80-08

Dear Mr. Brunner:

This refers to the routine inspection conducted by Messrs. W. Bannack and S. Hudson of your office on August 16-September 15, 1980, at Nine Mile Point Unit #1, Scriba, New York of activities authorized by NRC License No. DPR-63 and to the discussions of findings held by Messrs. W. Bannack and S. Hudson with Mr. T. Roman of our staff at the conclusion of the inspection.

ITEM A

Technical Specification 6.8.1 states, in part, "Written procedures and administrative policies shall be established, implemented, and maintained...."

Nine Mile Point Operating Procedure No. NI-OP-16, Feedwater System Booster Pump to Reactor, Revision 4, dated June 26, 1979, Table I, System Valve Line-Up, specifies that Valves No. FW-70, #11 F.W. pump recirc-stop valve and FW-71, #12 F.W. pump recirc-stop valve, shall be locked open.

Contrary to the above on August 27, 1980, Valves No. FW-70 and FW-71 were found to be open, but not locked.

RESPONSE

As described in detail #6 of the Inspection Report, the procedure involved was immediately changed, deleting the requirement for these valves to be locked. This action was accepted by the Inspector. Further corrective action involves a program in progress which is verifying the status and lock requirements for valves in all systems. This was also committed to in our response to previous Inspection Report 80-01.

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ITEM B

Technical Specification 6.8.1 states, in part: "Written procedures and administrative policies shall be established, implemented and maintained..."

Standing Order NMPSO N.7, Operation of Track Bay Extension Door D-198, September 16, 1975 provides the instruction for removing and reinstalling the removable bottom door seal assemblies.

Contrary to the above, on August 27, 1980 procedural requirements of Standing Order NMPSO No. 7 were not fully adhered to in that the removable bottom door seals were not properly reinstalled following a door opening. This resulted in an opening at the bottom of the track bay door. The inner track bay door was open at the time to support torus modification work in progress. The failure to properly install the removable bottom door seal resulted in a reduction of secondary containment capability.

RESPONSE

As described in the Inspection Report detail section #5b (7), the Secondary Containment integrity was promptly ensured by the closure of the inner track bay door. Action was then taken to properly install the outer door seals. For future prevention, the proper application of the corresponding procedure was reviewed with personnel involved as well as with other personnel who may have cause for its use in the future. The procedure for proper door operation is also posted at the door control location.

ITEM C

Technical Specification 6.8.1 states, in part: "Written procedures and administrative policies shall be established, implemented and maintained..."

The licensee's administrative policy for maintaining the fire door between the rooms housing diesel generators 102 and 103 closed as required consists of two labels on each side of the door. One label states, "Caution - Keep Closed". The other label reads "Caution - Fire Door Do Not Block".

Contrary to the above, on September 5, 1980, the fire door between the rooms housing diesel generators 102 and 103 was blocked open while the rooms were unoccupied.



RESPONSE

The item involving the open fire door was a result of contractor personnel needing continuous passage, whereby they were allowed to block the door open with a "Fire Watch" present. However, when the area was left for a lunch period, the door remained blocked open without a fire watch. When discovered, the situation was immediately rectified and the personnel involved were re-instructed about the requirements of this door. Further action involves the future development of a fire barrier inspection program which will include a daily surveillance of all fire doors. Requirements regarding fire barriers will be included in training for all employees.

ITEM D

Technical Specification 6.8.1 states, in part, "Written procedures and administrative policies shall be established, implemented and maintained..."

Nine Mile Point Administrative Procedure APN-7A, Placement of Jumpers, or Blocks on Lifting of Leads, Revision 1, Dated March 6, 1980, states in paragraph 3.1 that the placement of electrical jumpers, changing or removal of leads and the blocking of relays shall be performed in accordance with the approved procedures, or to preserve the safety, function or integrity of the station or systems.

Paragraph 4.3.1 of APN-7A states, in part that "under conditions for which no previously approved procedures exists, the Station Shift Supervision shall write an explanation of this action over his signature on the jumper log... He shall then arrange for the subsequent review and approval..."

Contrary to the above on September 11, 1980, the inspector noted that leads from various LPRM detectors to their flux amplifiers had been lifted without an approved procedure authorizing such action or without receiving subsequent review and approval of such action.

RESPONSE

The Instrument and Control procedure involved was revised to address the application of jumpers during that situation. This procedure was recorded on the corresponding jumper logs, and the appropriate Administrative Procedure was reviewed by all SSS's.

Sincerely,

Thomas E. Lemppes
Thomas E. Lemppes
Vice President -
Nuclear Generation

