NIAGARA MOHAWK

NMP-13445

NINE MILE POINT NUCLEAR STATION / P.O. BOX 32 LYCOMING, NEW YORK 13093 / TELEPHONE (315) 343-2110

August 20, 1985

Mr. Samuel J. Collins, Chief
Projects Branch No.2
Division of Reactor Projects
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

RE: Docket No. 50-220
Notice Of Violation (NRC Inspection Report 50-220/85-09)

Dear Mr. Collins:

This refers to the routine, safety inspection conducted by Mr. S. Hudson of your office on May 1 to June 30, 1985 at Nine Mile Point Nuclear Station, Unit I of activities authorized by NRC License No. DPR-63 and to the discussions of your findings held by Mr. Hudson with Mr. TW Roman of our staff at the conclusion of the inspection.

A Notice of Violation was included in the Inspection Report as follows:

Technical Specification, Section 6.8.1, requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USAEC Regulatory Guide 1.33.

ANSI N18.7-1972, Section 5.3.5(3), requires in part that instructions shall be provided for returning equipment to its normal operating status and that all jumpers shall be controlled.

Contrary to the above, on June 18, 1985, the control rod drive system had not been returned to its normal operating status since the caps on the vent valves on the control rod drive withdraw lines were removed and the vents connected by a manifold of tygon tubing.

Response

The Nine Mile Point Nuclear Station Recirculation Safe-End and Piping Replacement Outage was started with the knowledge that special and unique conditions would be present for a minimum period of one year, possibly more. Special effort was made to ensure that safety related and reliability related equipment was placed in conditions that would not cause the degradation of that equipment.

In addition to these special efforts for the lay-up of systems, the reactor coolant system itself was required to be in a very special and unique condition in order to perform the required work on the Recirculation Discharge Nozzles. This work required the Reactor coolant system and the Reactor Vessel to be totally drained.

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One of the important systems that received special lay-up requirements was the control rod drive system. Recommendations from the NSSS vendor stated that the control rod drives should not be allowed to dry out. In addition, the expected radiation doses at the discharge nozzles were quite high. Various additional shielding approaches were considered. The end result was to provide a continuous flow of condensate transfer water to the withdraw lines of the control rod drives. This maintained the seals of the drives in a fully wetted and flushed condition and also provided additional shielding in the form of the water in the guide tubes.

The administrative controls used to maintain the configuration of this special lay-up condition were covered by the procedure "Procedure for Temporary Lowering of the Reactor Vessel Water Level". The installation of this equipment was not controlled via this temporary procedure. The return of the water level to normal range was controlled using the procedure "Procedure for Restoring of Reactor Water Level Following Recirculation Piping Replacement". This procedure did not control the removal of the temporary equipment attached to the control rod drive system.

The situation that existed in this instance falls under ANSI N18.7-1972 Section 5.5 "Temporary Procedures". It states: "Temporary procedures and temporary revision to procedures may be issued to direct operations during testing and maintenance: to provide guidance in unusual situations not within the scope of the station operating procedures; and to ensure orderly and uniform operations for short periods when the plant, a system, or a component of a system is performing in a manner not covered by existing detailed procedures or has been modified or extended in such a manner that portions of existing procedures do not apply."

The situation that existed in this instance does not fall under ANSI N18.7-1972 Section 5.3.5 since the replacement of the recirculation piping was not considered part of the station maintenance program.

The structure, wording, and intent of ANSI N18.7-1972 Section 5.3.5 clearly applies to normal, repetitive maintenance activities. It is also evident that the standard recognizes that Section 5.3.5 will not always apply from the fact that Section 5.5 was included specifically to provide a mechanism to control actions outside the normal operations and maintenance activities.

The installation of the pipe caps on the vent valves should have been required to be performed and verified by the operators as part of the system return to service. The system operating procedure did not address these caps in the valve line up. In the past, the installation and removal of the pipe caps has been controlled as skills that are within the scope of qualified, Licensed Operators.

Corrective actions taken to date include:

a. All tygon hoses connected to the control rod drive withdraw vent connections have been removed; and

b. All pipe caps have been reinstalled on those withdraw vent connections.

In order to ensure that the control rod drive system vent caps are reinstalled in the future, the system operating procedure, "N1-OP-5 Control Rod Drive System" will be changed to add a step in the valve line up that installs and/or verifies installed the withdraw and insert vent valve caps. The procedure will also be changed to require that the caps are reinstalled after control rod drive venting.

The information relating to this violation will be presented to the Operations Department in the Operations Management Committee (OMC). The operators will be reminded that special attention is required to ensure that systems are checked for complete and thorough return to service following special evolutions, temporary configurations, and normal outage operations and maintenance. The operating procedure will be revised by January 1, 1986 and the topic will be discussed at the next Operations Management Committee (OMC) meeting.

Niagara Mohwak Power Corporation plans to implement a change to the administrative control program that will require detailed, written procedures, that will include independent verification, for the installation and removal of equipment used to support long term equipment lay-up. This change will be completed by January 1, 1986.

Sincerely,

Thomas E. Lempges

Thomas E. Lempges
Vice President
Nuclear Generation

TEL/tg
cc: