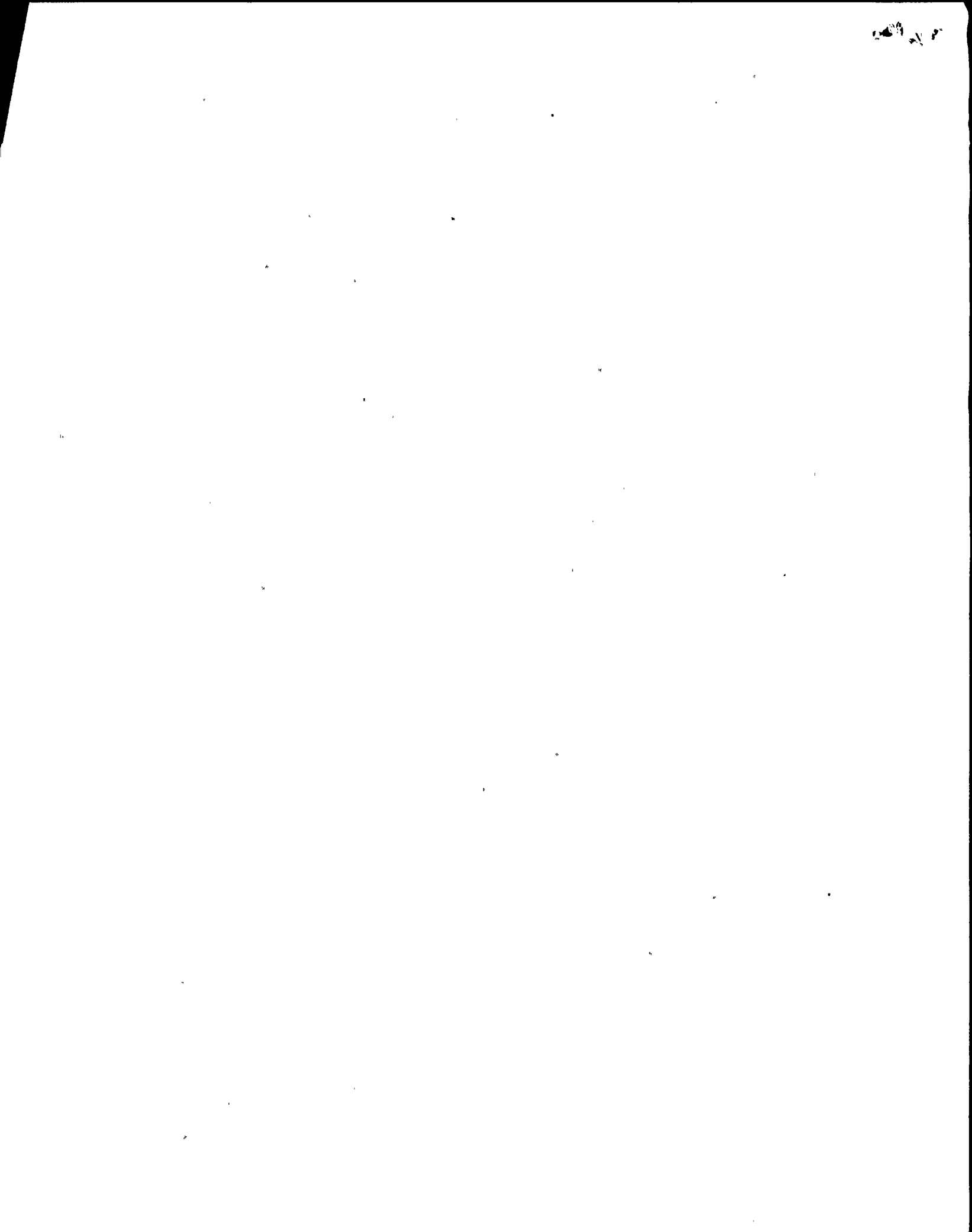


LICENSEE EVENT REPORT (LER)
QUALITY EVALUATION FOR
NINE MILE POINT 1 -
DURING THE PERIOD FROM
JUNE 1, 1985 TO OCTOBER 31, 1986

8710140137 B71002
PDR ADOCK 05000220
Q PDR

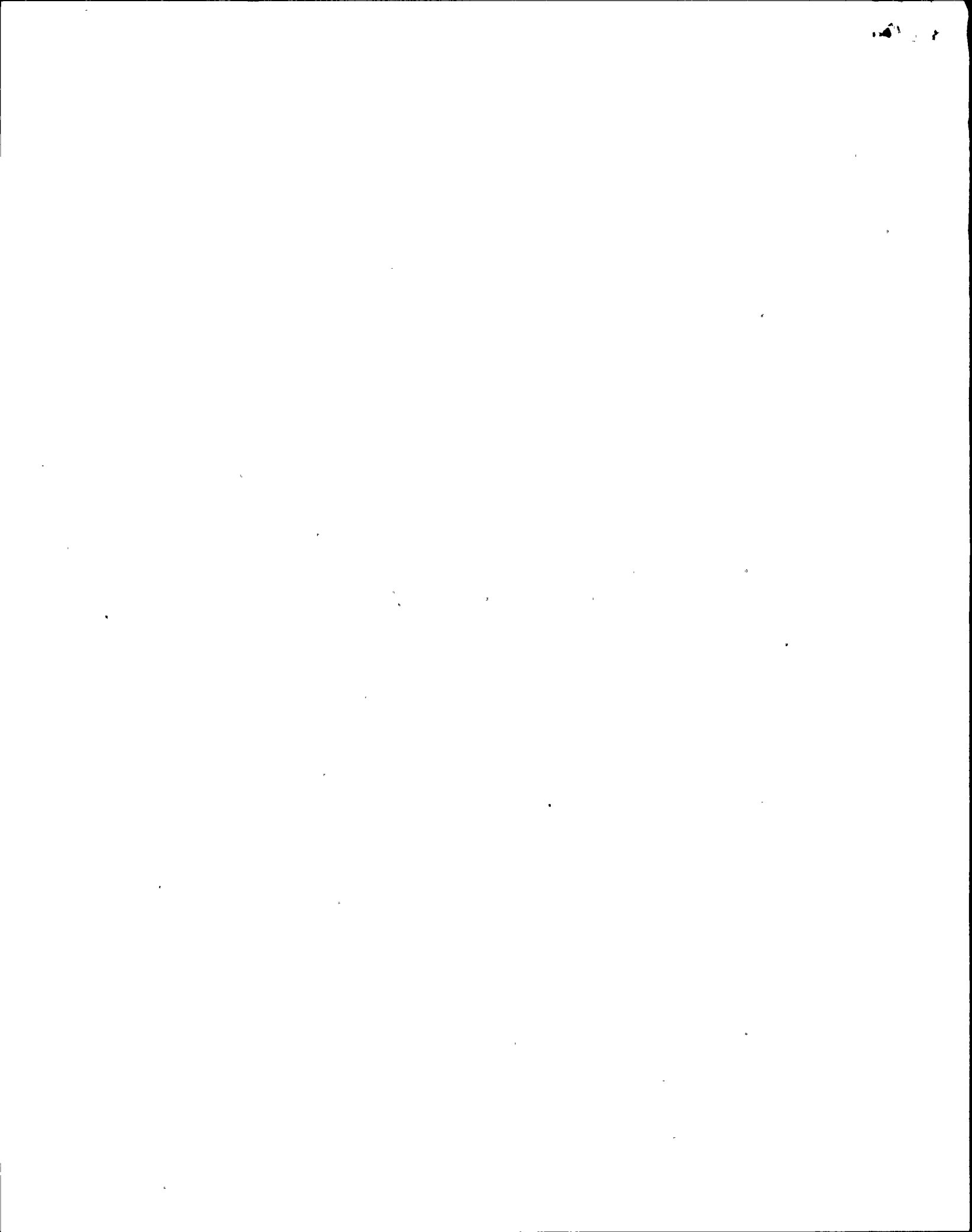


SUMMARY

An evaluation of the content of a representative sample of the Licensee Event Reports (LERs) submitted by Nine Mile Point 1 during the period from June 1, 1985 to October 31, 1986 was performed. This evaluation provides an overview of the quality of the LERs by comparing their contents to the reporting requirements of 10 CFR 50.73(b) and the guidelines contained in NUREG-1022 and its Supplements Nos. 1 and 2.

This is the first time the Nine Mile Point 1 LERs have been evaluated using this methodology. The results of this evaluation indicate that the Nine Mile Point 1 LERs have an overall average LER score of 8.3 out of a possible 10 points, compared with the current industry average of 8.4.

Of the three areas that are evaluated (i.e., the text, abstract, and coded fields), deficiencies in the text requirements were what kept the overall average LER score from being average or above. The most significant text deficiencies found in this evaluation concern the requirements to adequately discuss personnel errors and to identify failed components in the text (e.g., by manufacturer and model number). Other deficiencies include a lack of adequate date and time information, which affects the scores for Requirements 50.73(b)(2)(ii)(C) and (H), and no information being provided concerning Requirements 50.73(b)(5) and 50.73(b)(2)(ii)(F). The use of the outline format, which is suggested in NUREG-1022, Supplement No. 2, might result in improved texts.



LER QUALITY EVALUATION FOR NINE MILE POINT 1

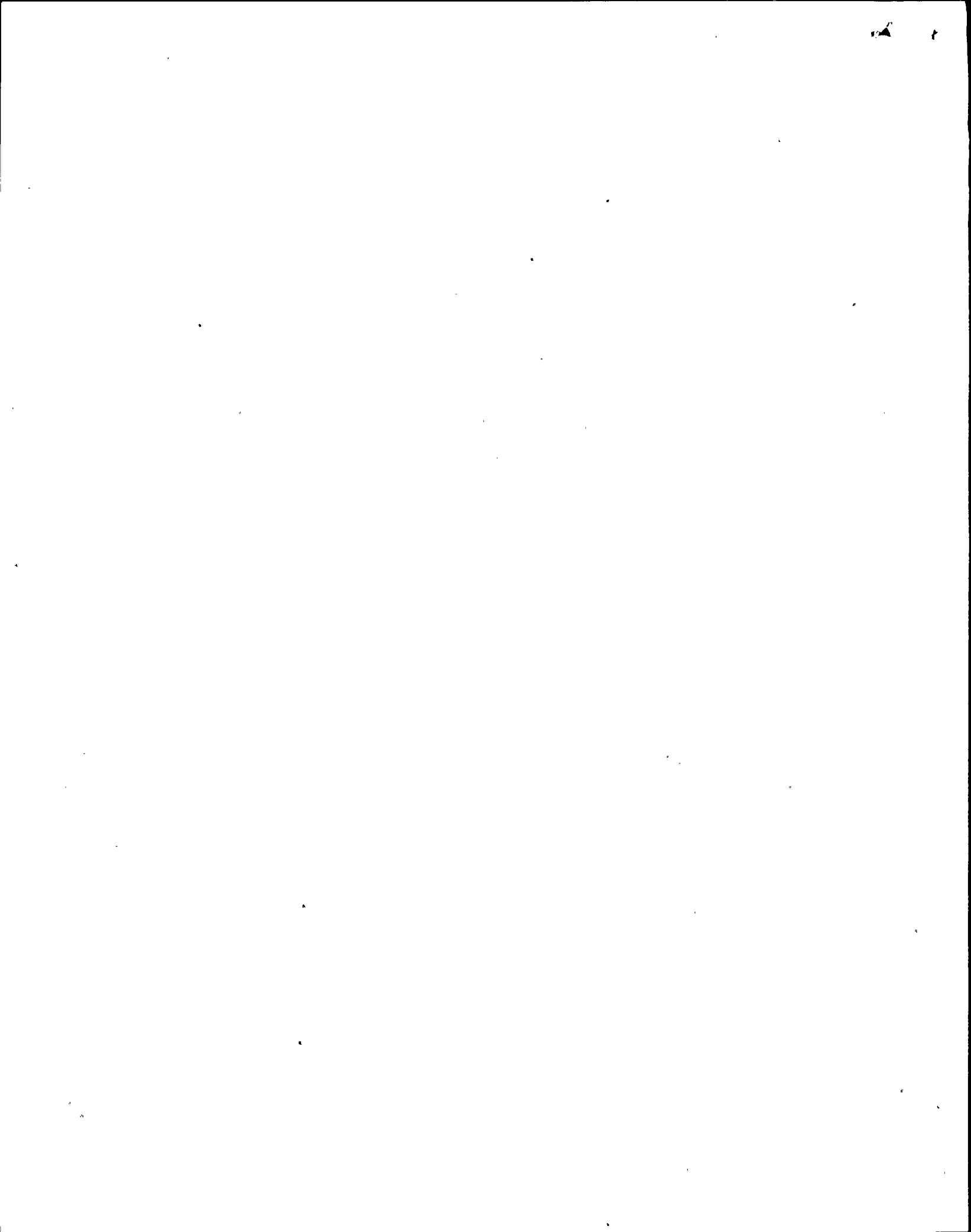
INTRODUCTION

In order to evaluate the overall quality of the contents of the Licensee Event Reports (LERs) submitted by Nine Mile Point 1 during the period from June 1, 1985 to October 31, 1986, a representative sample of the unit's LERs was evaluated using a refinement of the basic methodology presented in NUREG-1022, Supplement No. 2.¹ The sample consists of a total of 15 LERs, which is considered to be the maximum number of LERs necessary to have a representative sample. See Appendix A for a list of the LER numbers in the sample.

METHODOLOGY

The evaluation consists of a detailed review of each selected LER to determine how well the content of its text, abstract, and coded fields meet the criteria of 10 CFR 50.73(b). In addition, each selected LER is compared to the guidance for preparation of LERs presented in NUREG-1022² and Supplements No. 1³ and 2 to NUREG-1022; based on this comparison, suggestions were developed for improving the quality of the reports. The purpose of this evaluation is to provide feedback to improve the quality of LERs. It is not intended to increase the requirements concerning the "content" of reports beyond the current requirements of 10 CFR 50.73(b). Therefore, statements in this evaluation that suggest measures be taken are not intended to increase requirements and should be viewed in that light. However, the minimum requirements of the regulation must be met.

The evaluation process for each LER is divided into two parts. The first part of the evaluation consists of documenting comments specific to the content and presentation of each LER. The second part consists of determining a score (0-10 points) for the text, abstract, and coded fields of each LER.



The LER specific comments serve two purposes: (1) they point out what the analysts considered to be the specific deficiencies or observations concerning the information pertaining to the event, and (2) they provide a basis for a count of general deficiencies for the overall sample of LERs that was evaluated. Likewise, the scores serve two purposes: (1) they serve to illustrate in numerical terms how the analysts perceived the content of the information that was presented, and (2) they provide a basis for determining an overall score for each LER. The overall score for each LER is the result of combining the scores for the text, abstract, and coded fields (i.e., $0.6 \times \text{text score} + 0.3 \times \text{abstract score} + 0.1 \times \text{coded fields score} = \text{overall LER score}$).

The results of the LER quality evaluation are divided into two categories: (1) detailed information and (2) summary information. The detailed information, presented in Appendices A through D, consists of LER sample information (Appendix A), a table of the scores for each sample LER (Appendix B), tables of the number of deficiencies and observations for the text, abstract and coded fields (Appendix C), and comment sheets containing narrative statements concerning the contents of each LER (Appendix D). When referring to Appendix D, the reader is cautioned not to try to directly correlate the number of comments on a comment sheet with the LER scores, as the analysts have flexibility to consider the magnitude of a deficiency when assigning scores (e.g., the analysts sometimes make comments relative to a requirement without deducting points for that requirement).

RESULTS

A discussion of the analysts' conclusions concerning LER quality is presented below. These conclusions are based solely on the results of the evaluation of the contents of the LERs selected for review and as such represent the analysts' assessment of the unit's performance (on a scale of 0 to 10) in submitting LERs that meet the criteria of 10 CFR 50.73(b) and the guidance presented in NUREG-1022 and its supplements.

Table 1 presents the average scores for the sample of LERs evaluated for Nine Mile Point 1. In order to place the scores provided in Table 1 in perspective, the distribution of the latest overall average score for all unit/stations that have been evaluated using the current methodology is provided on Figure 1. Figure 1 is updated each month to reflect any changes in this distribution resulting from the inclusion of data for those units/stations that have not been previously evaluated or those that have been reevaluated. (Note: The previous overall average score for those units/stations that are reevaluated is replaced with the overall average score from the latest evaluation). Table 2 and Appendix Table B-1 provide a summary of the information that is the basis for the average scores in Table 1. For example, Nine Mile Point 1's average score for the text of the LERs that were evaluated is 8.0 out of a possible 10 points. From Table 2 it can be seen that the text score actually results from the review and evaluation of 17 different requirements ranging from the discussion of plant operating conditions before the event [10 CFR 50.73(b)(2)(11)(A)] to text presentation. The resultant percentage scores in the text summary section of Table 2 provide an indication of how well each text requirement was addressed by the unit for the 15 LERs that were evaluated. Based on similar methodology, the percentage scores for the various sections of the abstract and the items in the coded fields were also computed and are shown in Table 2.

Specific Deficiencies and Observations

As indicated in Table 2, certain requirements or areas within the text, abstract, and coded fields are causing the unit difficulty when preparing LERs. Relatively low percentage scores may indicate that the unit needs additional guidance concerning these requirements, or it may indicate that the unit understands the basic requirement but has either: (1) excluded certain less significant information from many of the discussions concerning that requirement or (2) totally failed to address the requirement in one or two of the selected LERs. Those responsible for preparing LERs should review the LER specific comments presented in Appendix D in order to determine why the unit received less than a perfect score for certain requirements. The more important deficiencies and

TABLE 1. SUMMARY OF SCORES^a FOR NINE MILE POINT 1

	Average	High	Low
Text	8.0	9.1	6.7
Abstract	8.7	9.5	7.9
Coded Fields	8.8	9.2	8.2
Overall	8.3	9.0	7.4

a. See Appendix B for a summary of scores for each LER that was evaluated.

ATTACHMENT A

Distribution of overall average LER scores

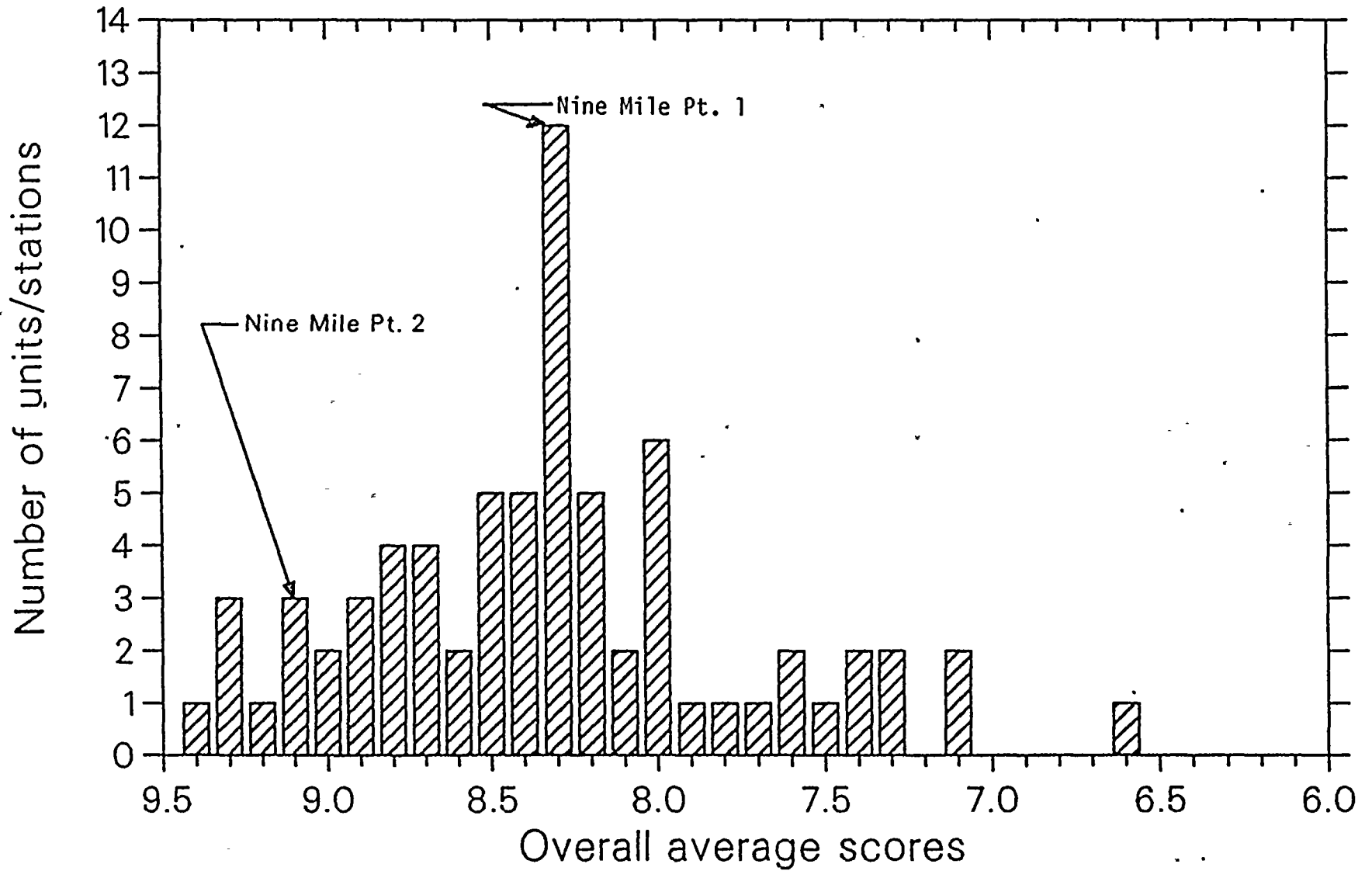


TABLE 2. LER REQUIREMENT PERCENTAGE SCORES FOR NINE MILE POINT 1

TEXT

Requirements [50.73(b)] - Descriptions	Percentage Scores () ^a
(2)(ii)(A) - - Plant condition prior to event	80 (15)
(2)(ii)(B) - - Inoperable equipment that contributed	b
(2)(ii)(C) - - Date(s) and approximate time(s)	77 (15)
(2)(ii)(D) - - Root cause and intermediate cause(s)	92 (15)
(2)(ii)(E) - - Mode, mechanism, and effect	100 (6)
(2)(ii)(F) - - EIIS codes	0 (15)
(2)(ii)(G) - - Secondary function affected	b
(2)(ii)(H) - - Estimate of unavailability	50 (4)
(2)(ii)(I) - - Method of discovery	83 (15)
(2)(ii)(J)(1) - Operator actions affecting course	100 (3)
(2)(ii)(J)(2) - Personnel error (procedural deficiency)	70 (10)
(2)(ii)(K) - - Safety system responses	93 (7)
(2)(ii)(L) - - Manufacturer and model no. information	46 (6)
(3) - - - - - Assessment of safety consequences	95 (15)
(4) - - - - - Corrective actions	87 (15)
(5) - - - - - Previous similar event information	0 (15)
(2)(i) - - - - Text presentation	81 (15)

ABSTRACT

Requirements [50.73(b)(1)] - Descriptions	Percentage Scores () ^a
- Major occurrences(immediate cause/effect)	97 (15)
- Plant/system/component/personnel responses	96 (8)
- Root cause information	82 (15)
- Corrective action information	85 (15)
* - Abstract presentation	78 (15)

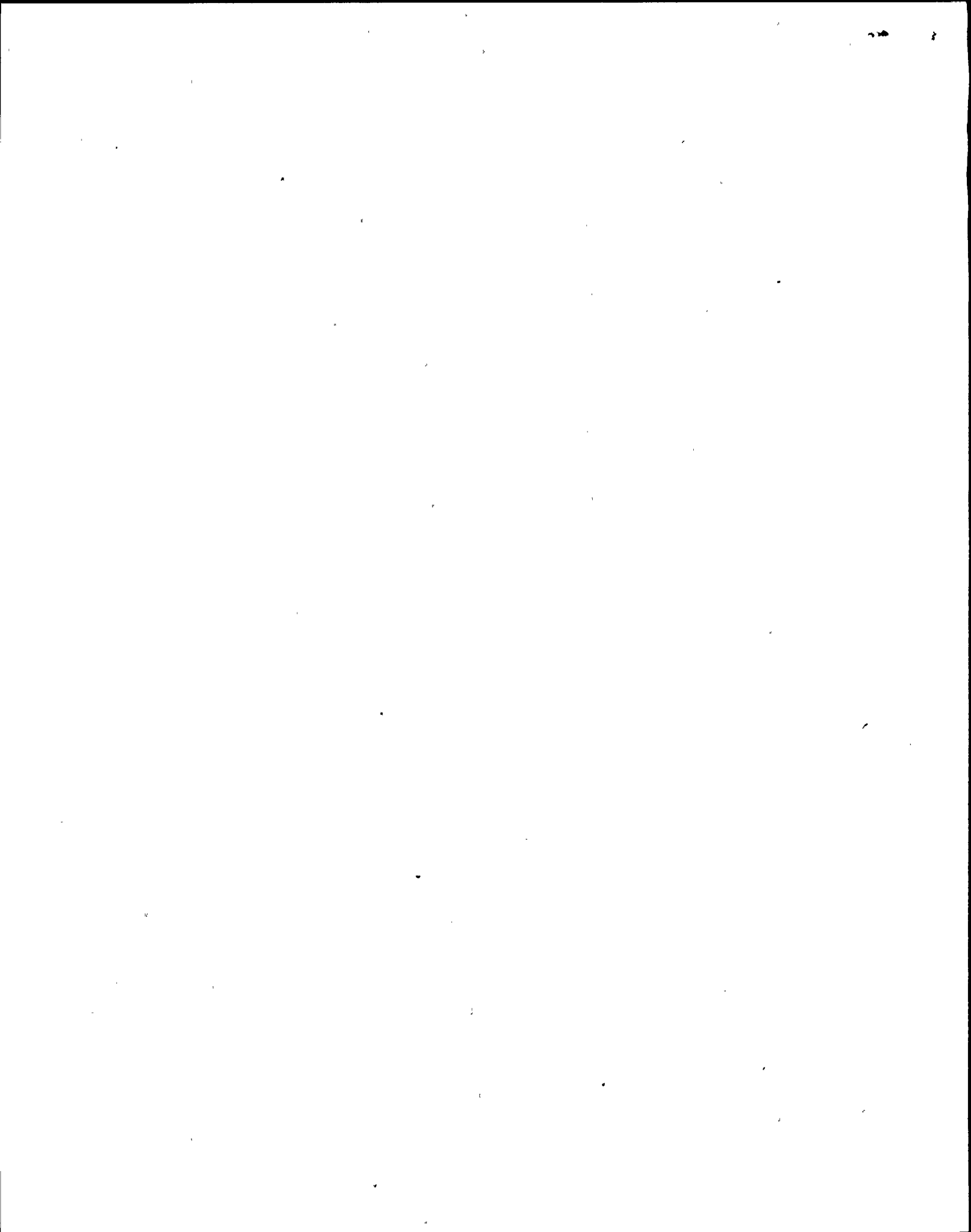
TABLE 2. (continued)

CODED FIELDS

Item Number(s) - Descriptions		Percentage: Scores () ^a
1, 2, and 3 -	Plant name(unit #), docket #, page #s	99 (15)
4 - - - - -	Title	55 (15)
5, 6, and 7 -	Event date, LER no., report date	100 (15)
8 - - - - -	Other facilities involved	100 (15)
9 and 10 - -	Operating mode and power level	100 (15)
11 - - - - -	Reporting requirements	100 (15)
12 - - - - -	Licensee contact information	100 (15)
13 - - - - -	Coded component failure information	92 (15)
14 and 15 - -	Supplemental report information	93 (15)

a. Percentage scores are the result of dividing the total points for a requirement by the number of points possible for that requirement. (Note: Some requirements are not applicable to all LERs; therefore, the number of points possible was adjusted accordingly.) The number in parenthesis is the number of LERs for which the requirement was considered applicable.

b. A percentage score for this requirement is meaningless as it is not possible to determine from the information available to the analyst whether this requirement is applicable to a specific LER. It is always given 100% if it is provided and is always considered "not applicable" when it is not.



observations for the text, abstract, and coded field sections of the LERs that were evaluated are discussed separately below.

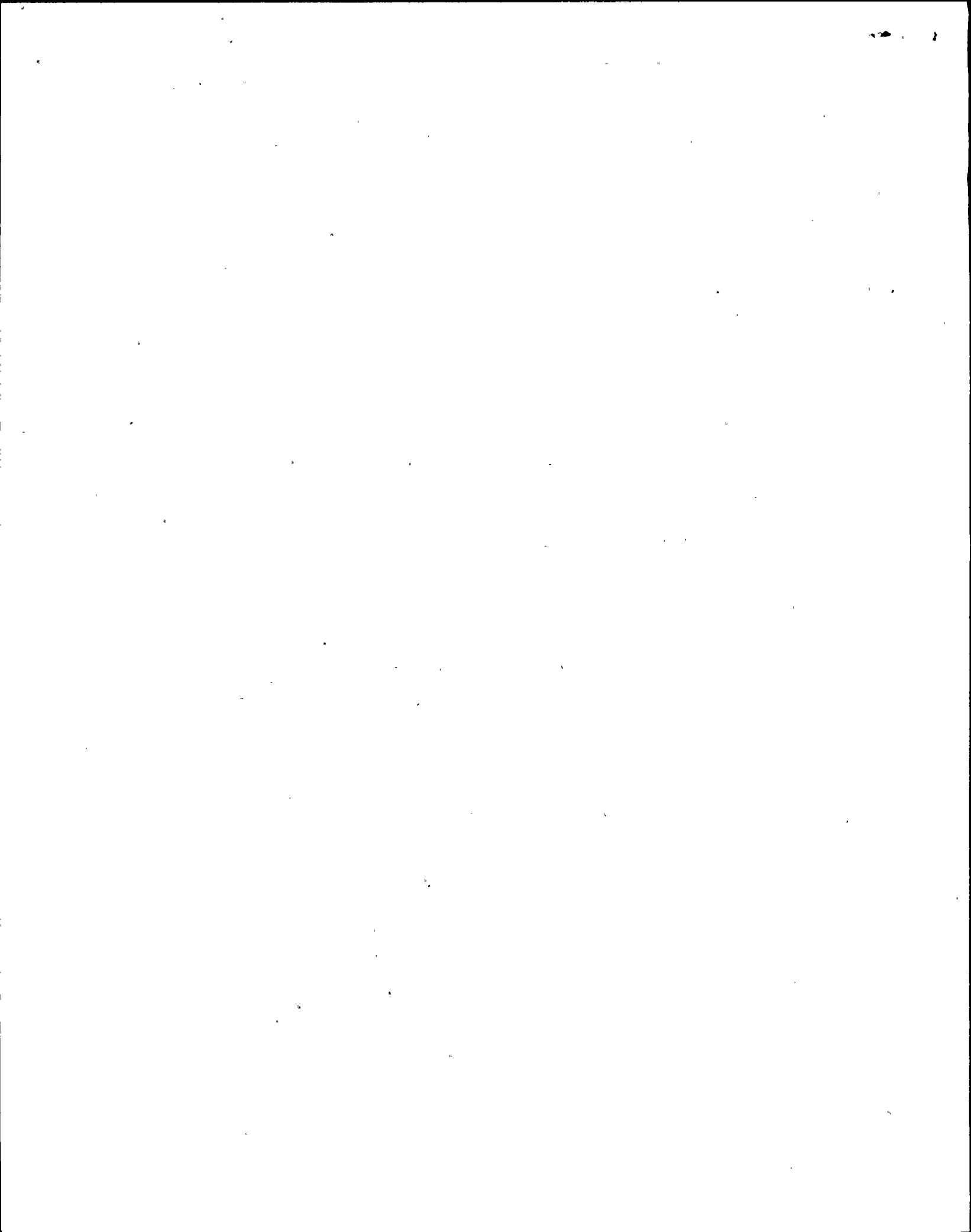
Text Deficiencies and Observations

Dates and approximate times were considered to be inadequate in seven of the 15 LERs, Requirement 50.73(b)(2)(11)(C). Dates and approximate times for the major occurrences discussed in the LER should be provided (e.g., occurrences such as scrams, discoveries, returning a component or system to service, and placing the unit in a safe and stable condition). An additional, but related, requirement was also considered to be deficient. Two of the four events involving the failure of a safety train did not provide an estimate of the length of time that the train was inoperable, Requirement 50.73(b)(2)(11)(H). This latter requirement can usually be satisfied if sufficient dates and times are provided in the text (i.e., an estimate, in days or hours, is not necessary if the reader has the time/date of failure and the time/date the system was returned to an operable status).

The Energy Industry Identification System (EIIS) component function identifier and system name codes were not provided in the text of any of the 15 LERs as is required by 50.73(b)(2)(11)(F).

Eight of the ten LERs involving personnel error/procedural deficiency were considered to lack information required by 50.73(2)(11)(J)(2). Two LERs failed to provide information concerning whether the error was of a cognitive or procedural nature and seven failed to provide information concerning the type of personnel involved in the event. In addition, one LER (86-020-00) appeared to involve a personnel error or procedural deficiency but it was not discussed at all (i.e., the failure to "hydro" a section of pipe after a penetration closure plate-to-pipe weld was completed).

Unique component identification was not provided in the text of four of the six LERs that involved a component failure, Requirement 50.73(b)(2)(11)(L). Components that fail should be identified in the text



so that others in the industry can be made aware of potential problems. An event at one station can often lead to the identification of a generic problem that can be corrected at other units or stations before they experience a similar event. In addition, although not specifically required by the current regulation, it would be helpful to identify components whose design contributes to an event even though the component does not actually fail.

Information concerning previous similar events was not provided in any of the 15 LERs [Requirement 50.73(b)(5)].

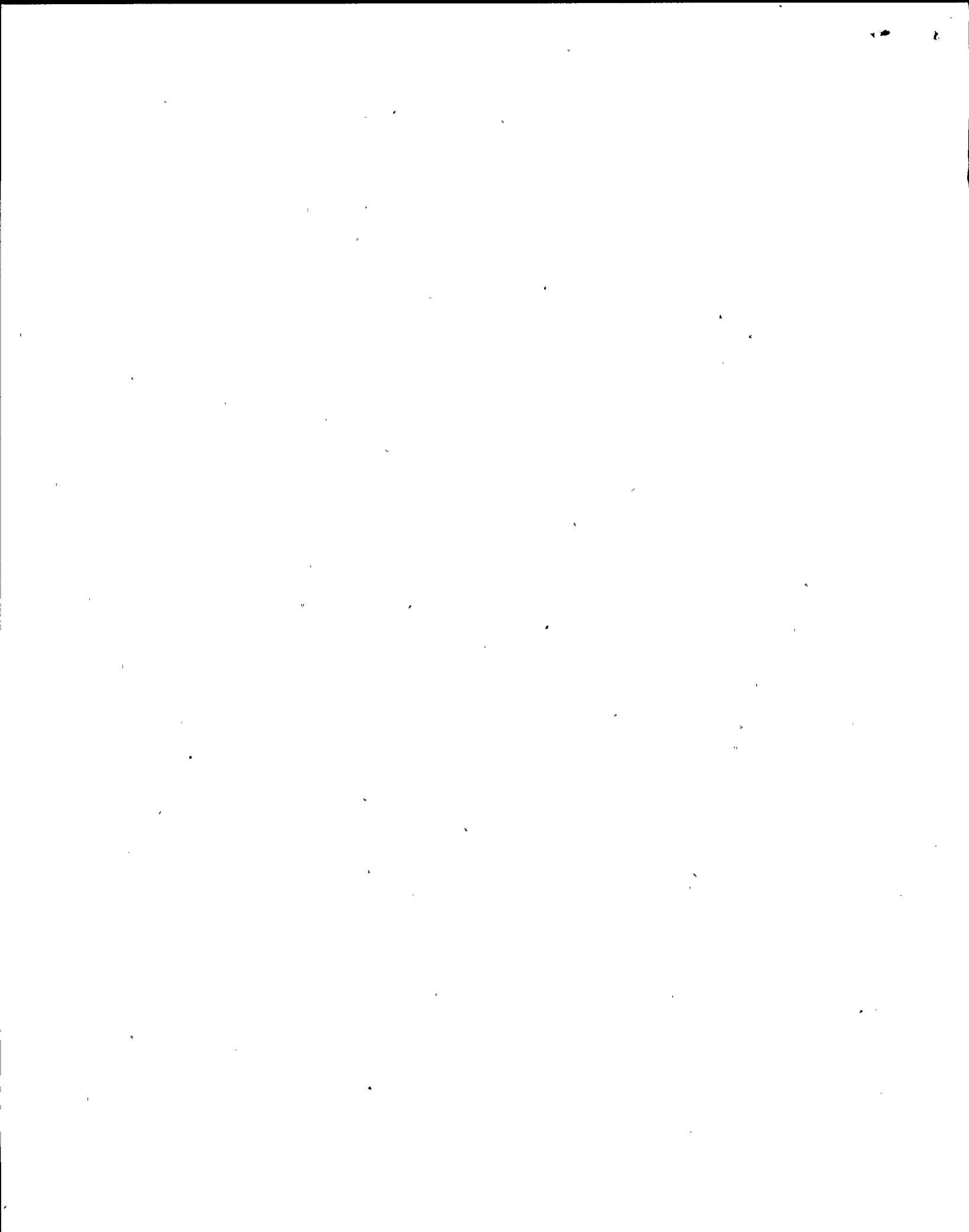
The text presentation, while acceptable, could be improved by presenting the required information in the outline format that is suggested in NUREG-1022, Supplement No. 2 dated September 1985, as is presently being done by Nine Mile Point 2.

Abstract Deficiencies and Observations

Although the Nine Mile Point 1 LERs, in general, have above average abstracts, reviewing the specific comments relative to abstracts in Appendix D could help to eliminate those problems that do exist. In particular, the cause and corrective action information that is provided in the text should be mentioned in the abstract. This practice will improve future abstract scores.

Coded Fields Deficiencies and Observations

The main deficiency in the area of coded fields involves the titles, Item (4). All fifteen of the titles failed to provide adequate cause information, one failed to adequately indicate the result (i.e., why the event was required to be reported), and eight failed to include the link between the cause and the result. While the result is considered the most important part of the title, the lack of cause information (and link, if necessary) results in an incomplete title. Example titles are provided in Appendix D (Coded Fields Section) for many of the titles that are considered to be deficient.



SUMMARY

Table 3 provides a summary of those areas of the Nine Mile Point 1 LERs that require the most improvement. For additional and more specific information concerning deficiencies, the reader should refer to the information presented in Appendices C and D. General guidance concerning requirements can be found in NUREG-1022, and NUREG-1022 Supplement No. 1 and 2.

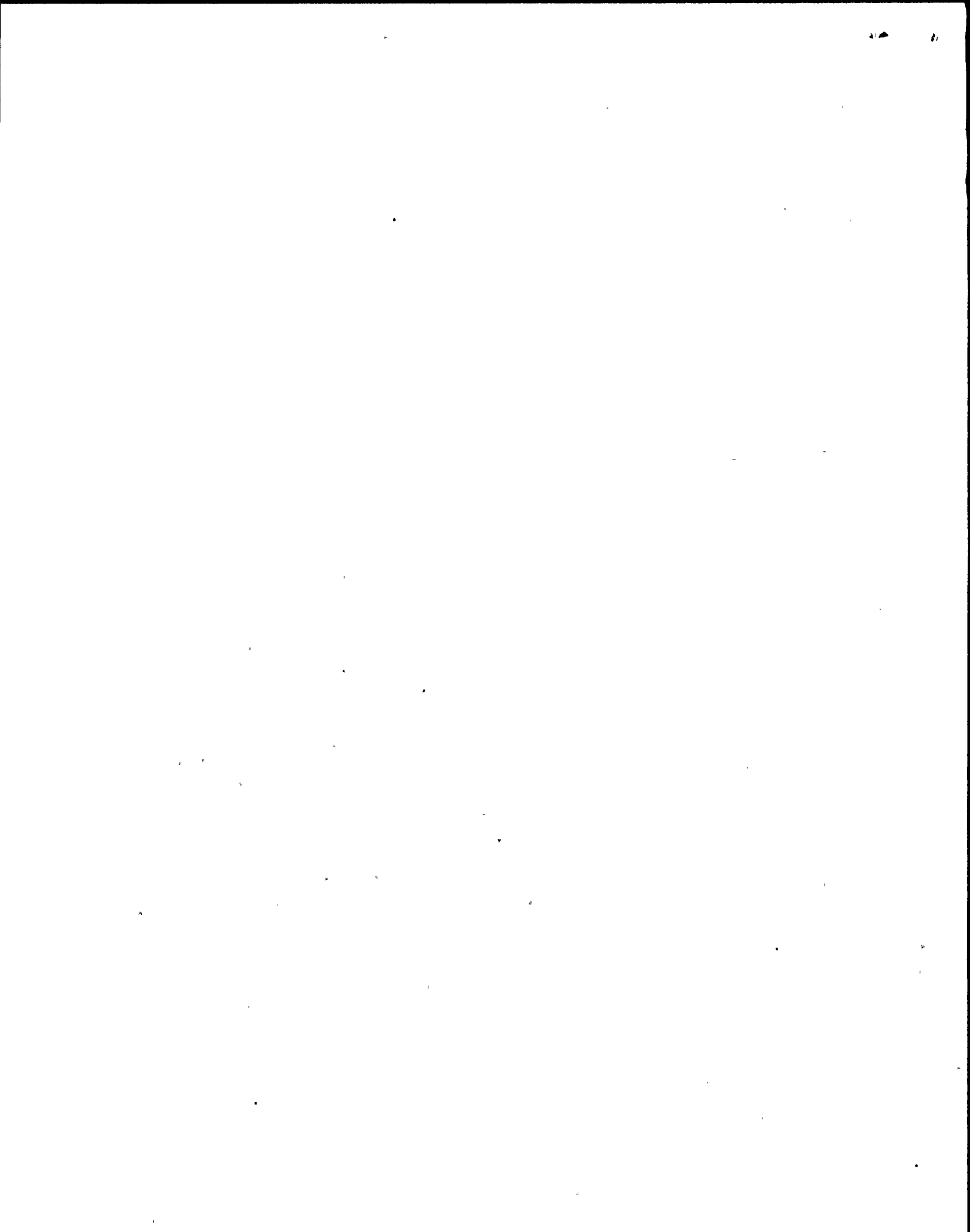


TABLE 3. AREAS MOST NEEDING IMPROVEMENT FOR NINE MILE POINT 1

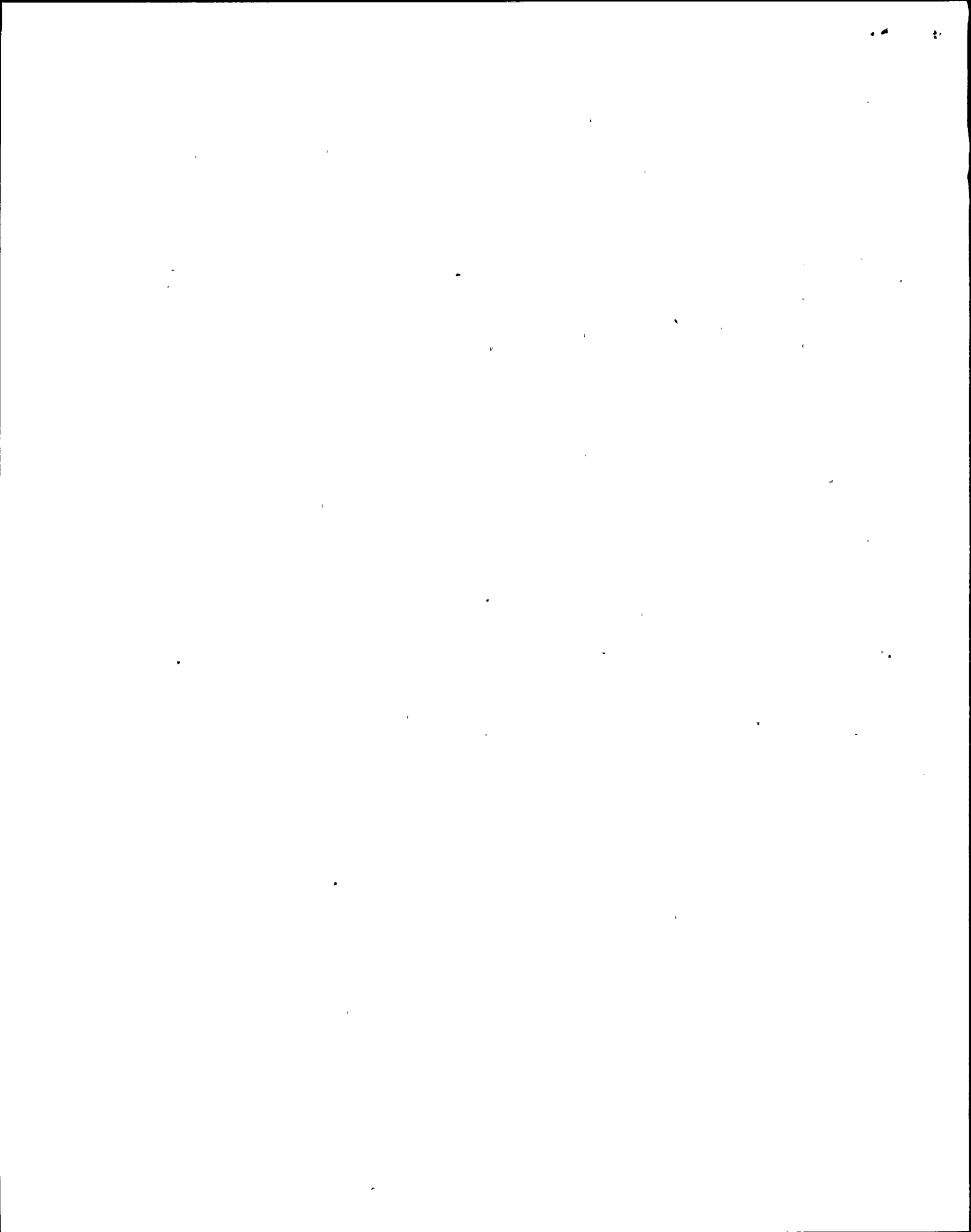
Areas	Comments
Date/times	Date/time information should be provided for the major occurrences discussed in the LER, (e.g., occurrences such as scrams, discoveries, removing from or replacing equipment in service, etc.).
Safety train unavailability	Sufficient dates and times should be included in the text to enable the reader to determine the length of time that safety system trains or components were out of service.
EIIIS code	EIIIS codes should be provided for each component or system referred to in the text.
Personnel error/procedural deficiency	Details should be explicitly stated; the cause of personnel error should be discussed, (e.g., cognitive or procedural). Contributing factors should be provided when appropriate as should the type of personnel involved in the error.
Manufacturer and model number	Component identification information should be included in the text whenever a component fails or (although not specifically required by the current regulation) is suspected of contributing to the event because of its design.
Previous similar events	Previous similar events should be referenced (e.g., by LER number) or, as stated in NUREG-1022, Supplement No. 2, if none are identified, the text should so state.
Text presentation	The present text format should be upgraded to the one suggested in NUREG-1022, Supplement No. 2.
Abstracts	Cause and corrective action information from the text should be mentioned in the abstract. Discuss all information in the text that is to be summarized in the abstract. Be sure to use the full space available.

TABLE 3. (continued)

Areas	Comments
Coded fields	
a. Titles	Titles should be written such that they better describe the event. In particular, cause information and a link between the cause and result should be provided in each title.

REFERENCES

1. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022 Supplement No. 2, U.S. Nuclear Regulatory Commission, September 1985.
2. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022, U.S. Nuclear Regulatory Commission, September 1983.
3. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022 Supplement No. 1, U.S. Nuclear Regulatory Commission, February 1984.

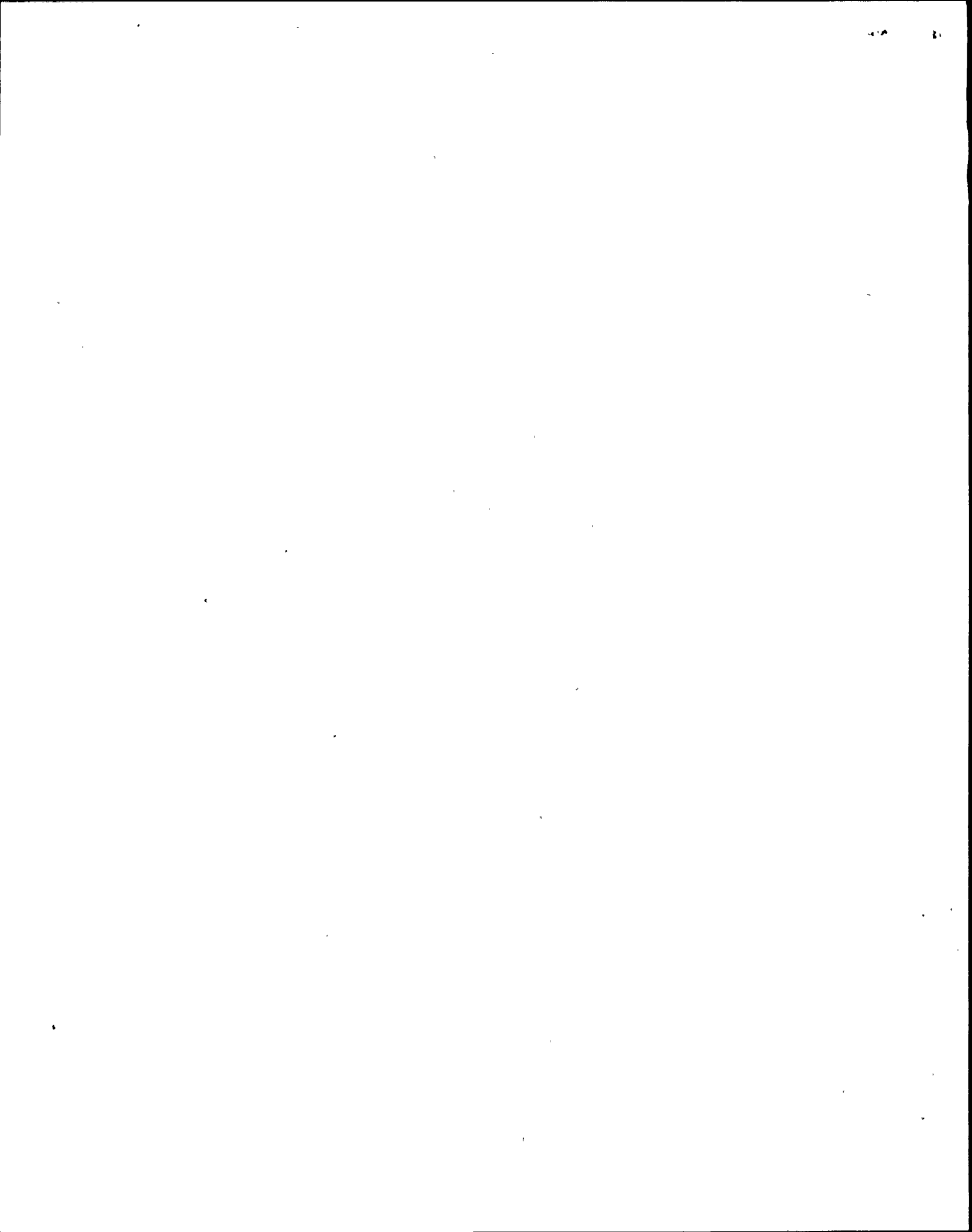


APPENDIX A

LER SAMPLE SELECTION
INFORMATION FOR NINE MILE POINT 1

TABLE A-1. LER SAMPLE SELECTION FOR NINE MILE POINT 1

Sample Number	LER Number	Comments
1	85-012-00	ESF
2	85-014-00	SCRAM
3	85-017-00	SCRAM
4	85-018-00	
5	85-024-00	ESF
6	86-002-01	
7	86-012-00	
8	86-016-00	
9	86-017-00	SCRAM
10	86-019-01	
11	86-020-00	
12	86-021-00	SCRAM, ESF
13	86-028-00	
14	86-029-00	
15	86-032-00	ESF



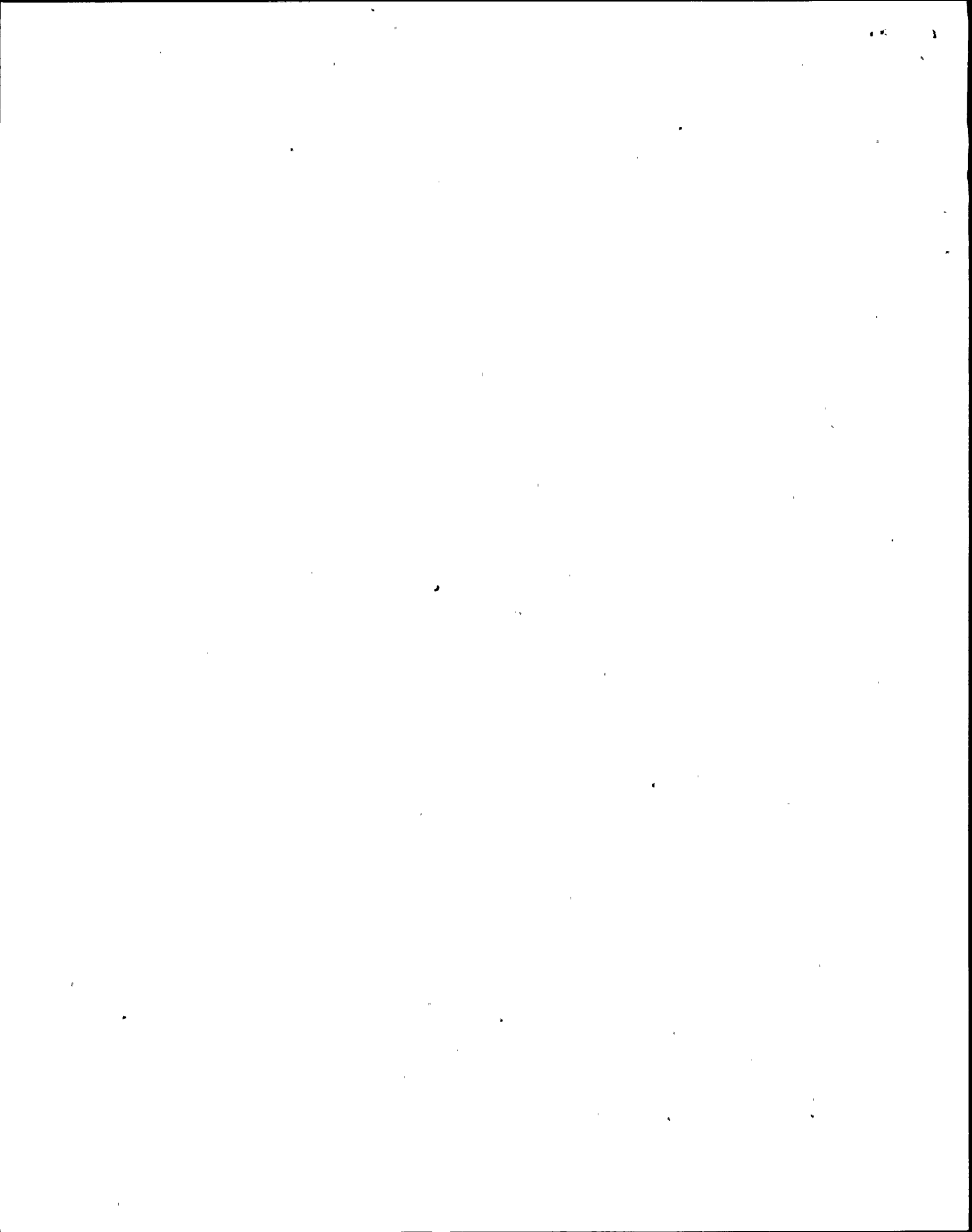
APPENDIX B
EVALUATION SCORES OF
INDIVIDUAL LERS FOR NINE MILE POINT 1

TABLE B-1. EVALUATION SCORES OF INDIVIDUAL LERS FOR NINE MILE POINT 1

	LER Sample Number ^a							
	1	2	3	4	5	6	7	8
Text	7.7	7.8	7.6	6.7	7.2	7.3	8.6	7.3
Abstract	8.8	8.7	8.6	8.4	8.0	7.9	9.5	8.6
Coded Fields	9.0	8.7	9.0	9.0	8.9	8.5	9.2	8.5
Overall	8.2	8.2	8.1	7.4	7.6	7.6	8.9	7.8

	LER Sample Number ^a							Average
	9	10	11	12	13	14	15	
Text	8.5	8.2	8.9	8.9	8.3	8.4	9.1	8.0
Abstract	8.5	8.9	8.5	9.0	8.8	9.5	9.0	8.7
Coded Fields	9.2	8.2	8.5	9.0	8.8	8.5	8.5	8.8
Overall	8.6	8.4	8.7	8.9	8.5	8.8	9.0	8.3

a. See Appendix A for a list of the corresponding LER numbers.



APPENDIX C
DEFICIENCY AND OBSERVATION
COUNTS FOR NINE MILE POINT 1

TABLE C-1. TEXT DEFICIENCIES AND OBSERVATIONS FOR NINE MILE POINT 1

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
<u>50.73(b)(2)(11)(A)</u> --Plant operating conditions before the event were not included or were inadequate.		4 (15)
<u>50.73(b)(2)(11)(B)</u> --Discussion of the status of the structures, components, or systems that were inoperable at the start of the event and that contributed to the event was not included or was inadequate.		0 (2)
<u>50.73(b)(2)(11)(C)</u> --Failure to include sufficient date and/or time information.		7 (15)
a. Date information was insufficient.	7	
b. Time information was insufficient.	6	
<u>50.73(b)(2)(11)(D)</u> --The root and/or intermediate cause of the component or system failure was not included or was inadequate.		3 (15)
a. Cause of component failure was not included or was inadequate.	3	
b. Cause of system failure was not included or was inadequate.	0	
<u>50.73(b)(2)(11)(E)</u> --The failure mode, mechanism (immediate cause), and/or effect (consequence) for each failed component was not included or was inadequate.		0 (6)
a. Failure mode was not included or was inadequate.		
b. Mechanism (immediate cause) was not included or was inadequate.		
c. Effect (consequence) was not included or was inadequate.		

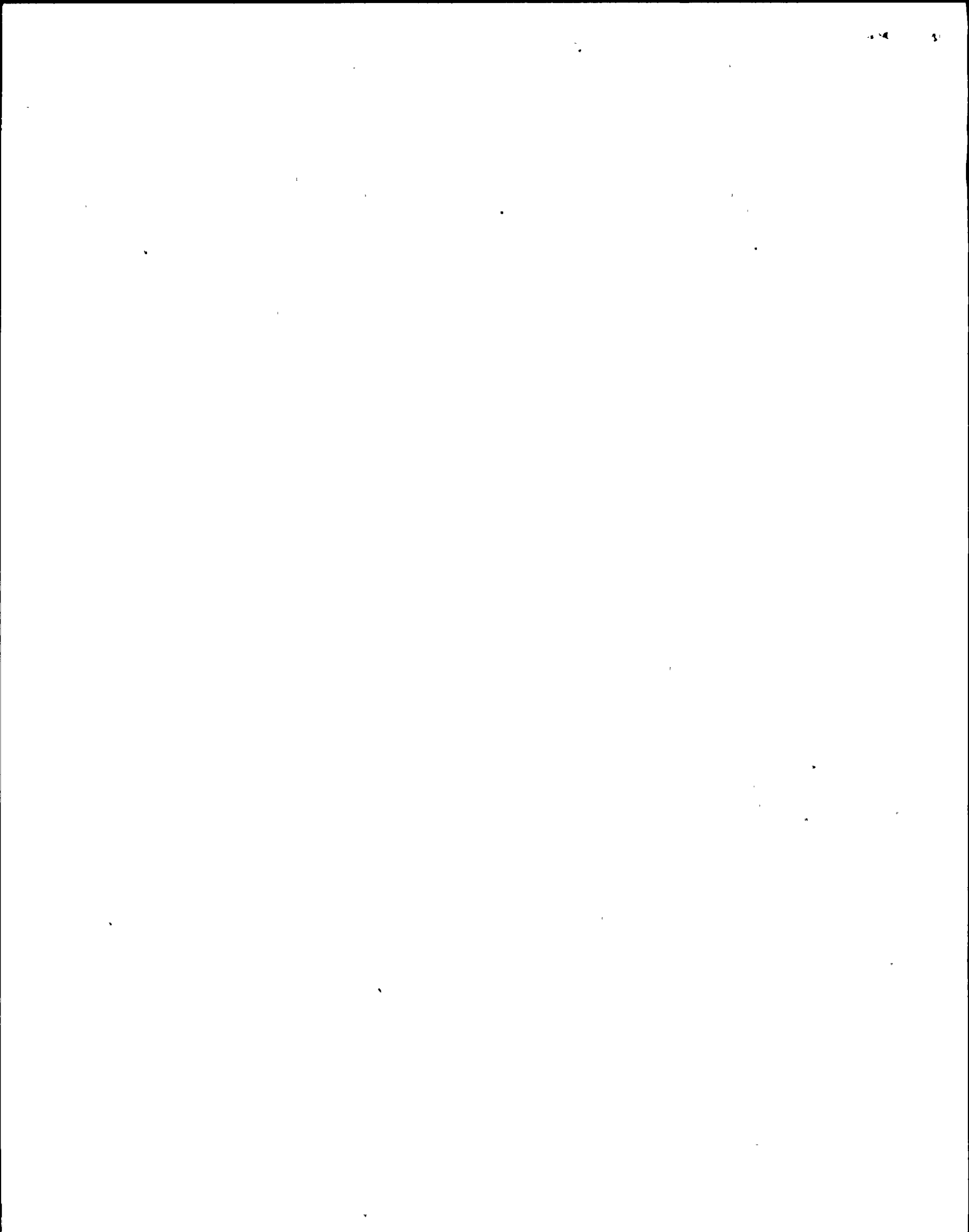


TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
<u>50.73(b)(2)(ii)(F)</u> --The Energy Industry Identification System component function identifier for each component or system was not included.		15 (15)
<u>50.73(b)(2)(ii)(G)</u> --For a failure of a component with multiple functions, a list of systems or secondary functions which were also affected was not included or was inadequate.		-- (0)
<u>50.73(b)(2)(ii)(H)</u> --For a failure that rendered a train of a safety system inoperable, the estimate of elapsed time from the time of the failure until the train was returned to service was not included.		2 (4)
<u>50.73(b)(2)(ii)(I)</u> --The method of discovery of each component failure, system failure, personnel error, or procedural error was not included or was inadequate.		4 (15)
a. Method of discovery for each component failure was not included or was inadequate.	0	
b. Method of discovery for each system failure was not included or was inadequate.	0	
c. Method of discovery for each personnel error was not included or was inadequate.	2	
d. Method of discovery for each procedural error was not included or was inadequate.	2	

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
<u>50.73(b)(2)(ii)(j)(1)</u> --Operator actions that affected the course of the event including operator errors and/or procedural deficiencies were not included or were inadequate.		0 (3)
<u>50.73(b)(2)(ii)(j)(2)</u> --The discussion of each personnel error was not included or was inadequate.		8 (10)
a. OBSERVATION: A personnel and/or procedural error was implied by the text, but was not explicitly stated.	1	
b. <u>50.73(b)(2)(ii)(j)(2)(i)</u> --Discussion as to whether the personnel error was cognitive or procedural was not included or was inadequate.	2	
c. <u>50.73(b)(2)(ii)(j)(2)(ii)</u> --Discussion as to whether the personnel error was contrary to an approved procedure, was a direct result of an error in an approved procedure, or was associated with an activity or task that was not covered by an approved procedure was not included or was inadequate.	0	
d. <u>50.73(b)(2)(ii)(j)(2)(iii)</u> --Discussion of any unusual characteristics of the work location (e.g., heat, noise) that directly contributed to the personnel error was not included or was inadequate.	0	
e. <u>50.73(b)(2)(ii)(j)(2)(iv)</u> --Discussion of the type of personnel involved (i.e., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) was not included or was inadequate.	7	

TABLE C-1. (continued)

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
<u>50.73(b)(2)(ii)(K)</u> --Automatic and/or manual safety system responses were not included or were inadequate.		2 (7)
<u>50.73(b)(2)(ii)(L)</u> --The manufacturer and/or model number of each failed component was not included or was inadequate.		4 (6)
<u>50.73(b)(3)</u> --An assessment of the safety consequences and implications of the event was not included or was inadequate.		2 (15)
a. OBSERVATION: The availability of other systems or components capable of mitigating the consequences of the event was not discussed. If no other systems or components were available, the text should state that none existed.	1	
b. OBSERVATION: The consequences of the event had it occurred under more severe conditions were not discussed. If the event occurred under what were considered the most severe conditions, the text should so state.	0	
<u>50.73(b)(4)</u> --A discussion of any corrective actions planned as a result of the event including those to reduce the probability of similar events occurring in the future was not included or was inadequate.		6 (15)

TABLE C-1. (continued)

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
a. A discussion of actions required to correct the problem (e.g., return the component or system to an operational condition or correct the personnel error) was not included or was inadequate.	0	
b. A discussion of actions required to reduce the probability of recurrence of the problem or similar event (correct the root cause) was not included or was inadequate.	5	
c. OBSERVATION: A discussion of actions required to prevent similar failures in similar and/or other systems (e.g., correct the faulty part in all components with the same manufacturer and model number) was not included or was inadequate.	0	
<u>50.73(b)(5)</u> --Information concerning previous similar events was not included or was inadequate.		15 (15)

TABLE C-1. (continued)

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
<u>50.73(b)(2)(i)--Text presentation inadequacies.</u>		5 (15)
a. OBSERVATION: A diagram would have aided in understanding the text discussion.	0	
b. Text contained undefined acronyms and/or plant specific designators.	3	
c. The text contains other specific deficiencies relating to the readability.	5	

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, (e.g., an LER can be deficient in the area of both date and time information), the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more requirement deficiencies or observations. The number in parenthesis is the number of LERs for which the requirement was considered applicable.

TABLE C-2. ABSTRACT DEFICIENCIES AND OBSERVATIONS FOR NINE MILE POINT 1

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
A summary of occurrences (immediate cause and effect) was not included or was inadequate.		2 (15)
A summary of plant, system, and/or personnel responses was not included or was inadequate.		2 (8)
a. Summary of plant responses was not included or was inadequate.	0	
b. Summary of system responses was not included or was inadequate.	2	
c. Summary of personnel responses was not included or was inadequate.	0	
A summary of the root cause of the event was not included or was inadequate.		9 (15)
A summary of the corrective actions taken or planned as a result of the event was not included or was inadequate.		8 (15)

TABLE C-2. (continued)

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
Abstract presentation inadequacies.		13 (15)
a. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text, therefore, the text should discuss all information summarized in the abstract.	3	
b. The abstract was greater than 1400 spaces.	1	
c. The abstract contains undefined acronyms and/or plant specific designators.	1	
d. The abstract contains other specific deficiencies (i.e., poor summarization, contradictions, etc.).	8	

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more deficiency or observation. The number in parenthesis is the number of LERs for which a certain requirement was considered applicable.

TABLE C-3. CODED FIELDS DEFICIENCIES AND OBSERVATIONS FOR NINE MILE POINT 1

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
Facility Name		0 (15)
a. Unit number was not included or incorrect.		
b. Name was not included or was incorrect.		
c. Additional unit numbers were included but not required.		
Docket Number was not included or was incorrect.		0 (15)
Page Number was not included or was incorrect.		1 (15)
Title was left blank or was inadequate.		15 (15)
a. Root cause was not given or was inadequate.	15	
b. Result (effect) was not given or was inadequate.	1	
c. Link was not given or was inadequate.	8	
Event Date		0 (15)
a. Date not included or was incorrect.		
b. Discovery date given instead of event date.		
LER Number was not included or was incorrect.		0 (15)
Report Date		0 (15)
a. Date not included.		
b. OBSERVATION: Report date was not within thirty days of event date (or discovery date if appropriate).		
Other Facilities information in field is inconsistent with text and/or abstract.		0 (15)
Operating Mode was not included or was inconsistent with text or abstract.		0 (15)

TABLE C-3. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
Power level was not included or was inconsistent with text or abstract.		0 (15)
Reporting Requirements		0 (15)
a. The reason for checking the "OTHER" requirement was not specified in the abstract and/or text.		
b. OBSERVATION: It may have been more appropriate to report the event under a different paragraph.		
c. OBSERVATION: It may have been appropriate to report this event under an additional unchecked paragraph.		
Licensee Contact		0 (15)
a. Field left blank.		
b. Position title was not included.		
c. Name was not included.		
d. Phone number was not included.		
Coded Component Failure Information		2 (15)
a. One or more component failure sub-fields were left blank.	0	
b. Cause, system, and/or component code is inconsistent with text.	0	
c. Component failure field contains data when no component failure occurred.	1	
d. Component failure occurred but entire field left blank.	1	

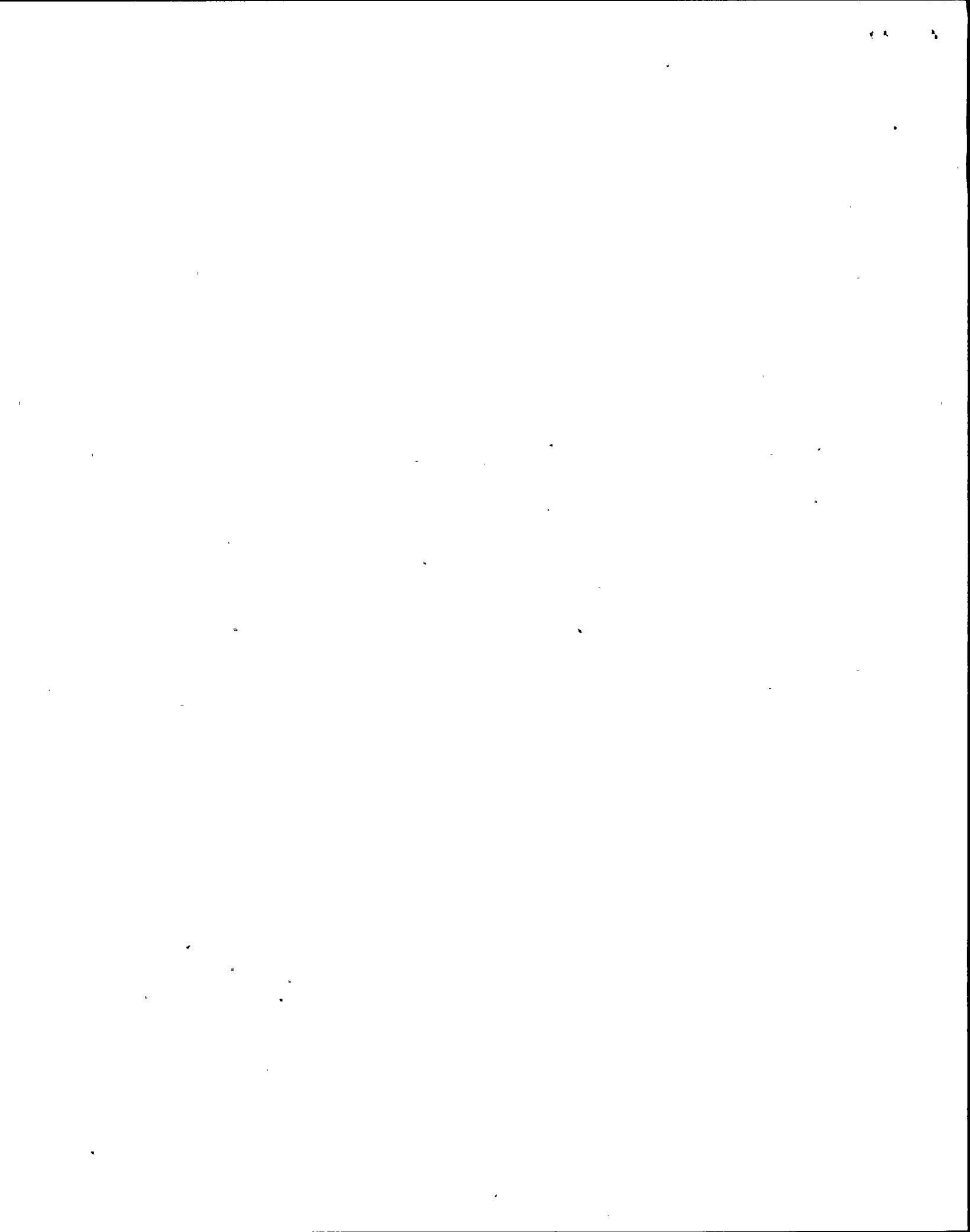


TABLE C-3. (continued)

<u>Description of Deficiencies and Observations</u>	<u>Number of LERs with Deficiencies and Observations</u>	
	<u>Sub-paragraph Totals^a</u>	<u>Paragraph Totals ()^b</u>
Supplemental Report		1 (15)
a. Neither "Yes"/"No" block of the supplemental report field was checked.	1	
b. The block checked was inconsistent with the text.	0	
Expected submission date information is inconsistent with the block checked in Item (14).		0 (15)

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more requirement deficiencies or observations. The number in parenthesis is the number of LERs for which a certain requirement was considered applicable.

APPENDIX D

LER COMMENT SHEETS FOR NINE MILE POINT 1

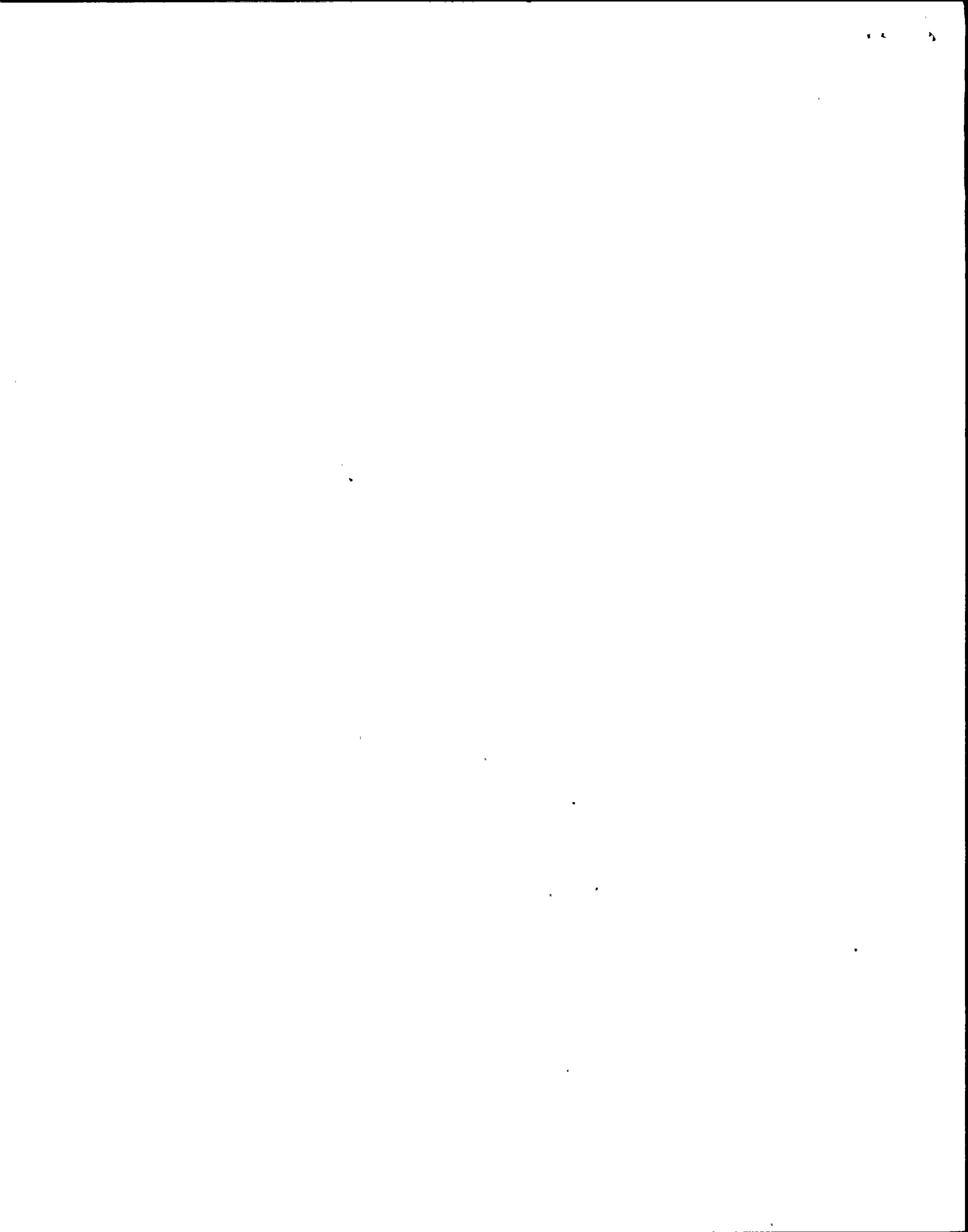


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
1. LER Number: 85-012-00	
Scores: Text = 7.7 Abstract = 8.8 Coded Fields = 9.0 Overall = 8.2	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(D)</u>--The root and/or intermediate cause discussion concerning the gland packing failure is not included. 2. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 3. <u>50.73(b)(2)(11)(L)</u>--Identification (e.g., manufacturer and model no.) of the failed component(s) discussed in the text is inadequate. Is there a model number available which would uniquely identify the valve? 4. <u>50.73(b)(4)</u>--Without an adequate root cause discussion for the gland packing (see text comment 1), it is not obvious if replacing the packing is adequate to prevent recurrence. 5. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. As in the text, the gland packing leak was not adequately addressed. 2. Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Cause (gland packing failure) and link (high temperature) are not included. A more appropriate title might be "High Area Temperature due to a Steam Leak (Gland Packing Failure) results in Automatic Isolation of Reactor Cleanup System".

TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
2. LER Number: 85-014-00	
Scores: Text = 7.8 Abstract = 8.7 Coded Fields = 8.7 Overall = 8.2	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(C)</u>--Date/time information is not included for the scram, stable shutdown, return to service for the motor generator set and the feedwater pump, and the motor generator set brush connecting wire breaking free from its lug. 2. <u>50.73(b)(2)(11)(D)</u>--The root and/or intermediate cause discussion concerning how the motor generator set brush connecting wire broke free from its lug is not included. Was it done by the maintenance electrician during testing (personnel error), by vibration, or by some other means? 3. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 4. <u>50.73(b)(2)(11)(H)</u>--A time estimate of the unavailability of the failed train/system is not included for the amplidyne motor generator set or for the #11 Reactor Feedwater Pump. 5. <u>50.73(b)(2)(11)(K)</u>--Discussion of automatic and/or manual safety system responses is inadequate. Did an actual safety injection occur? 6. <u>50.73(b)(2)(11)(L)</u>--Identification (e.g., manufacturer and model no.) of the failed component(s) discussed in the text is not included for the motor generator set and the feedwater pump switch. 7. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of the safety system responses is inadequate for the same reasons discussed in text comment number 5. 2. <u>50.73(b)(1)</u>--Summary of the root cause information is inadequate for the same reasons discussed in text comment number 2.

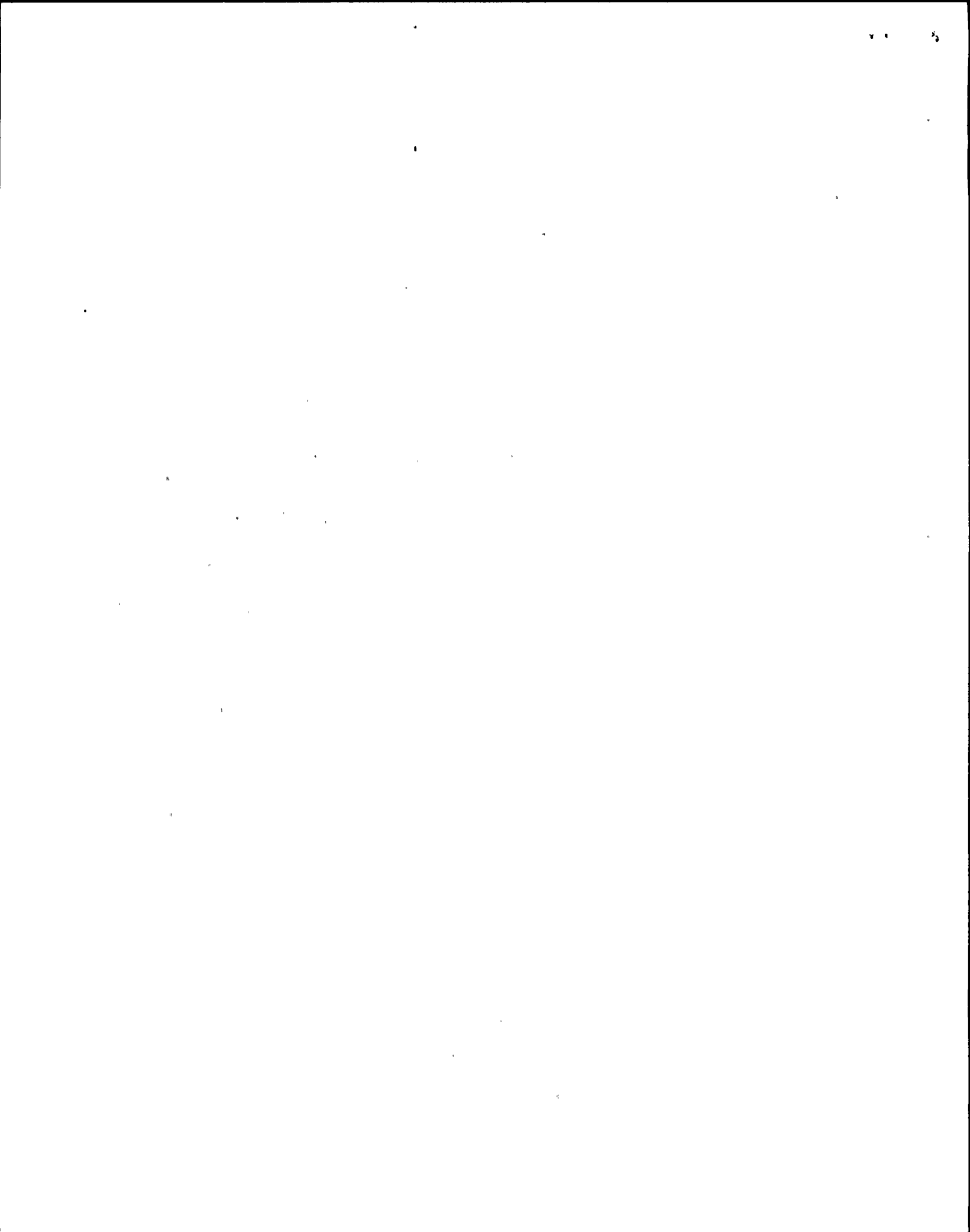


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
2. LER Number: 85-014-00 (Continued)	
	3. <u>50.73(b)(1)</u> --Summary of corrective actions taken or planned as a result of the event is inadequate. A summary of the repairs performed is not included.
	4. Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	
	1. <u>Item (4)</u> --Title: Cause information is not included. A better title might be: "Broken Motor Generator Set Brush Connecting Wire Inadvertently Grounded (personnel error) During Surveillance Test Results in Scram".
	2. <u>Item (13)</u> --Component failure (brush holder wire) occurred but entire field is blank.

TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
3. LER Number: 85-017-00	
Scores: Text = 7.6 Abstract = 8.6 Coded Fields = 9.0 Overall = 8.1	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(A)</u>--Information concerning the plant operating conditions before the event is inadequate. What was the power level at the time of the scram? 2. <u>50.73(b)(2)(11)(C)</u>--Not enough dates and/or times are provided to give the reader an adequate time history of the overall event. For example, what was the time of the scram and when was the Number 11 Feedwater Flow Control Valve returned to service? 3. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 4. <u>50.73(b)(2)(11)(J)(1)</u>--Did the operators notice the decreasing level and attempt to do anything about it? Did any alarms precede the scram? 5. <u>50.73(b)(2)(11)(L)</u>--Identification (e.g., manufacturer and model no.) of the failed component(s) discussed in the text is not included. 6. <u>50.73(b)(4)</u>--Discussion of corrective actions taken or planned is inadequate. Specifically, what was done to secure the appropriate screws so as to avoid recurrence of this type of event? That is, was the vibration problem fixed, were the screws tightened using an adhesive, and/or were they tightened to a new higher torque valve? 7. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of cause information is inadequate. The "vibration" is not mentioned in the abstract. 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate for the same reasons given in the text comments.

TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
3. LER Number: 85-017-00 (Continued)	
	3. Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	1. <u>Item (4)</u> --Title: Cause information is not included. A better title would be "Low Water Level Scram When Feedwater Valve Closed Due To Loose Spring Screw (Vibration) in Valve Positioner".

TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
4. LER Number: 85-018-00	
Scores: Text = 6.7 Abstract = 8.4 Coded Fields = 9.0 Overall = 7.4	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(i)(D)</u>--What was the reason for the 17 month delay in modifying the system? 2. <u>50.73(b)(2)(i)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 3. <u>50.73(b)(2)(i)(L)</u>--While there was no failure and technically the components do not have to be identified, identification would be helpful to others trying to determine if they have the same problem. 4. <u>50.73(b)(3)</u>--Although the text states that fire suppression was available, it is not clear if this means from other systems (if this is the case they should be described) or from the automatic start feature (if this is the case, then the consequences of not being able to start the pumps manually if needed should be discussed). 5. <u>50.73(b)(4)</u>--Details of the modification were not discussed. 6. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state. 7. The lack of details as discussed in previous text comments makes the text hard to follow.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. The modifications to the procedure were not mentioned.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Cause is not included.

TABLE D-7. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
5. LER Number: 85-024-00	
Scores: Text = 7.2 Abstract = 8.0 Coded Fields = 8.9 Overall = 7.6	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(C)</u>--Date/time information for resetting HPCI and returning the reactor water level to a stable position was not included. 2. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 3. <u>50.73(b)(2)(11)(J)(2)(i)</u>--Discussion as to whether the personnel error was cognitive or procedural is not included. The text does not explicitly state a personnel error was involved in this event. 4. <u>50.73(b)(2)(11)(J)(2)(iv)</u>--Discussion of the type of personnel involved (e.g., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) is not included. 5. <u>50.73(b)(2)(11)(K)</u>--Discussion of automatic and/or manual safety system responses is inadequate. Was fluid actually injected? 6. <u>50.73(b)(4)</u>--Discussion of corrective actions taken or planned is inadequate. A discussion of actions required to reduce the probability of recurrence (i.e, correction of the root cause) is inadequate. What type of instructions are being reviewed with operators during requalification training? 7. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state. 8. Acronym(s) and/or plant specific designator(s) are undefined. The acronym, GE-MAC, is undefined. 9. Some ideas are not presented clearly (hard to follow). The text is not clear whether or not the operators knew about the discrepancies in instrumentation compensation.

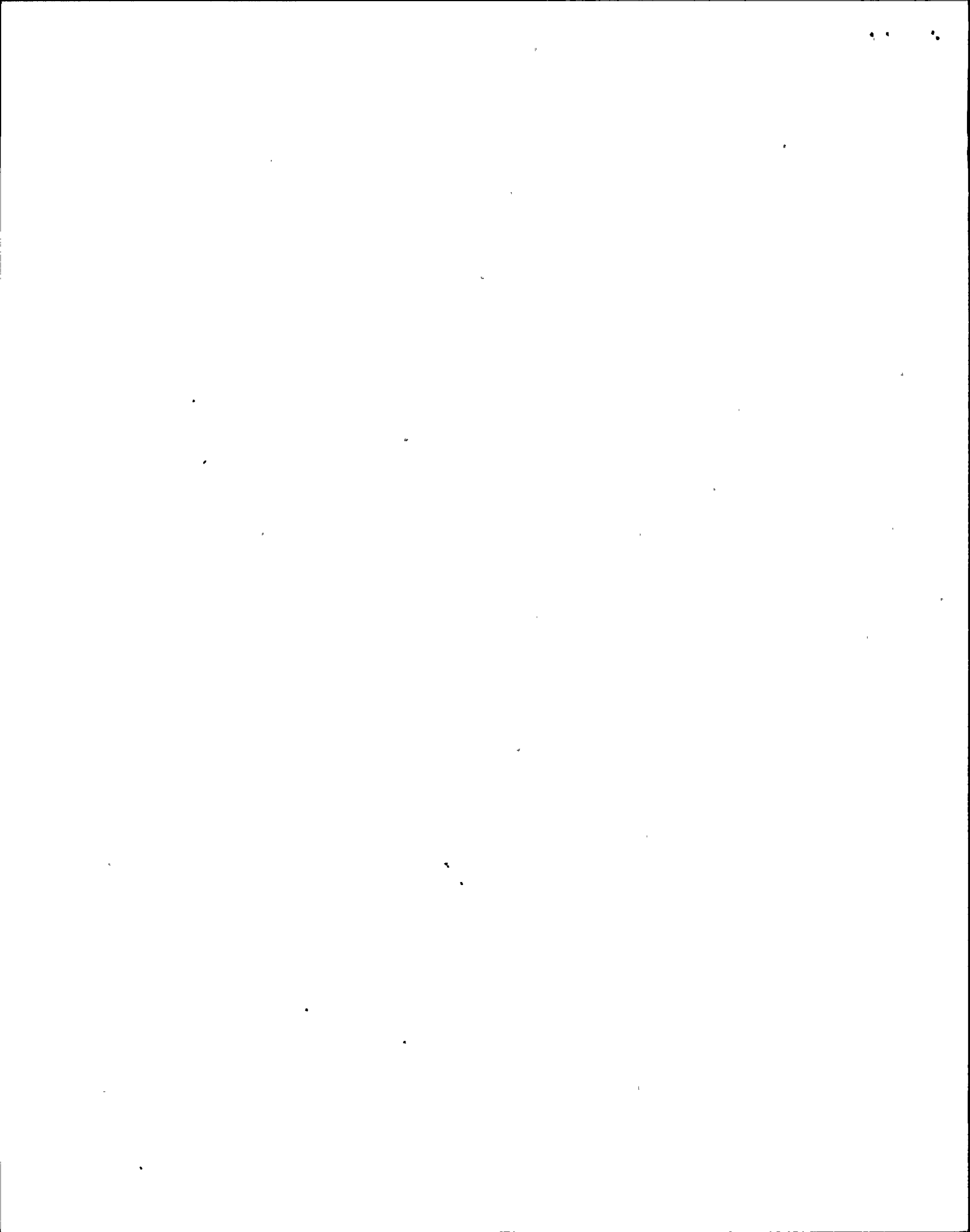


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
5. LER Number: 85-024-00 (Continued)	
Abstract	<ol style="list-style-type: none"><li data-bbox="332 352 1301 457">1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. Long-term corrective actions summary is not included.<li data-bbox="332 489 1301 583">2. Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	<ol style="list-style-type: none"><li data-bbox="332 621 1301 821">1. <u>Item (4)</u>--Title: Cause is not included. Acronyms in the title should be avoided unless space is limited. A better title might be: "Failure to Recognize Differences in Level Instrumentation Compensation (Personnel Error) Causes High Pressure Coolant Injection Initiation".<li data-bbox="332 852 1301 917">2. <u>Item (13)</u>--Component failure field contains data when no component failure occurred.

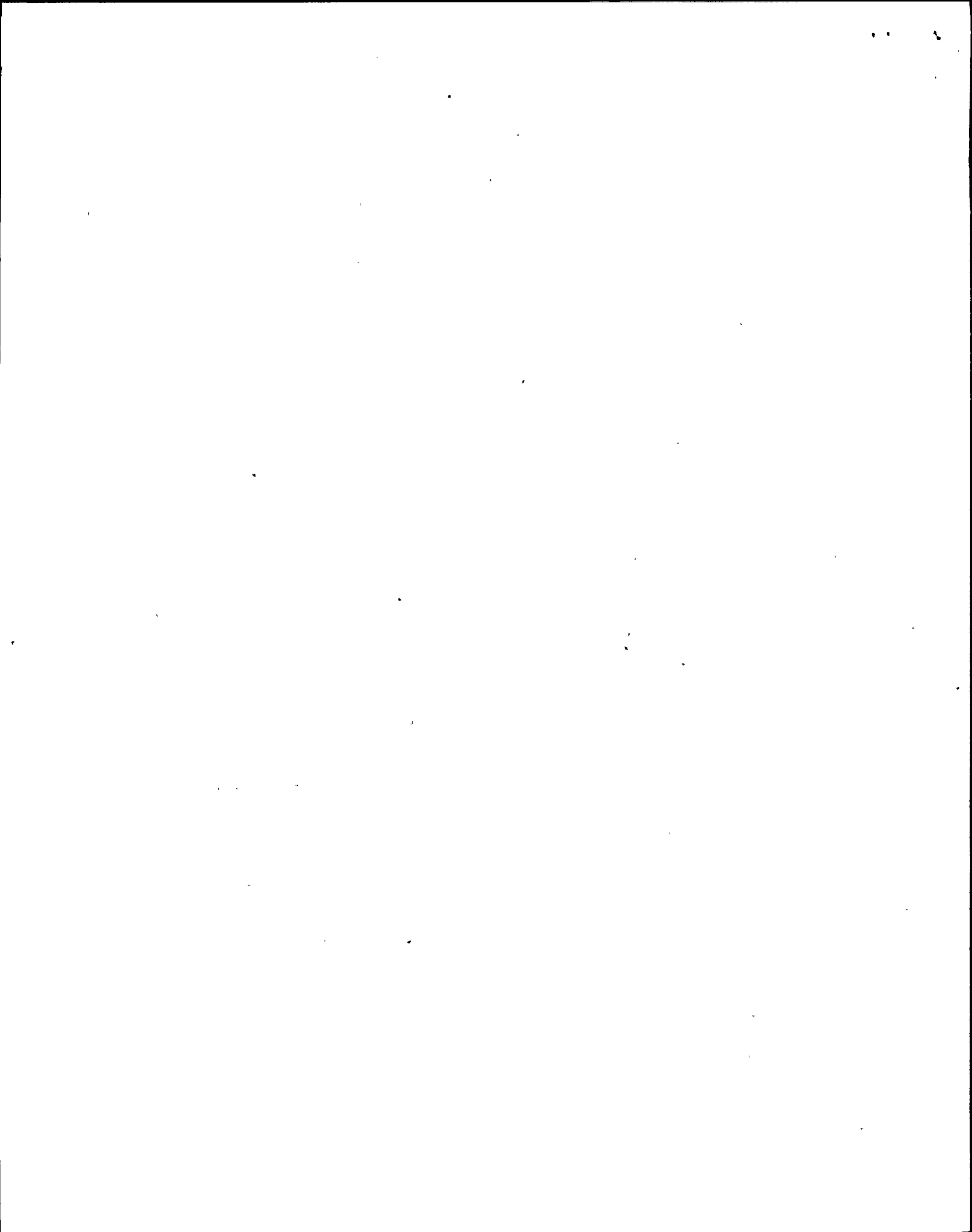


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
6. LER Number: 86-002-01 (Continued)	
7.	<u>50.73(b)(4)</u> --Discussion of corrective actions taken or planned is inadequate. Prior to the proposed Technical Specification change, what will ensure that the unit will be shutdown if required (the Station Shift Supervisor instructions)? What was done to prevent dirt from building up in OGESMS pump 12 in the future? Will it be cleaned periodically? Was the microchip failure considered to be random or an end of life failure? Was anything done to try to prevent future failures of this board?
8.	<u>50.73(b)(5)</u> --Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
9.	A logical transition does not exist between all ideas.
10.	This LER should probably have been submitted as two events (i.e., two separate LERs).
11.	If the information provided in Inspection Report 50-220/86-03 is considered important to the understanding of this event (or provided required information), this information should have been presented in the text rather than providing a reference, which is not available to most readers.
Abstract	
1.	<u>50.73(b)(1)</u> --Summary of occurrences [immediate cause(s) and effects(s)] is inadequate. The abstract failed to explain that pump #12 was on because pump #1 was taken out of service.
2.	<u>50.73(b)(1)</u> --Summary of cause information is inadequate. The fact that the problem with pump #1 was a heat sensitive microchip on board M8226 should have been mentioned.
3.	OBSERVATION: The abstract is intended to be a summary of the text; therefore, the text must include all information summarized in the abstract. This abstract contains information that was not included in the text.

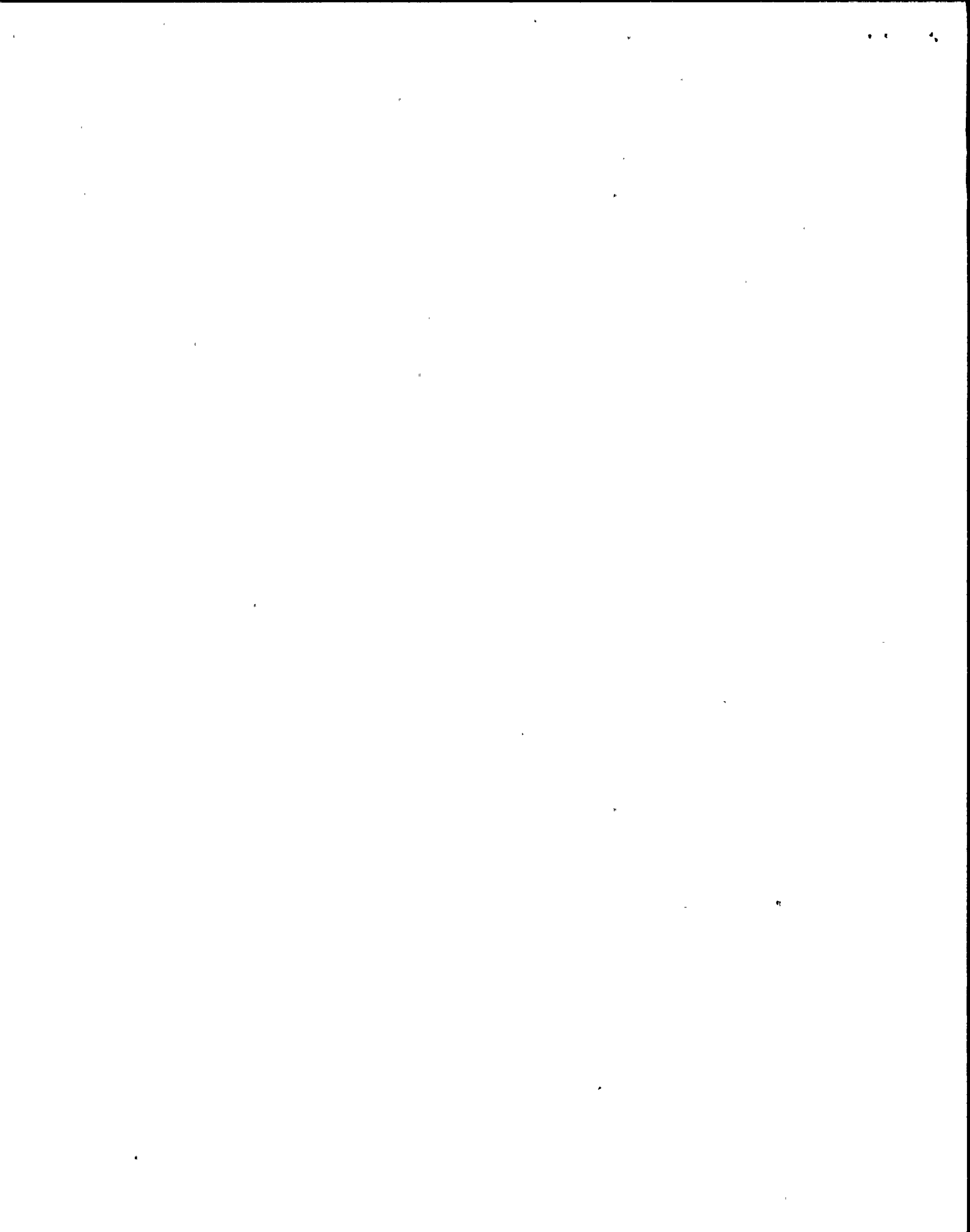


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
6. LER Number: 86-002-01 (Continued)	
Coded Fields	1. <u>Item (4)</u> --Title: Cause information is not provided and the result and link are inadequate. A better title might be "Two Separate Stack Gas Sample Pump Failures (Failed Microchip and Dirt in Pump Internals Respectively) Result In Not Sampling Continuously As Required--Unit Not Shutdown as Required on First Failure". (Note: From this title it should be apparent that this is really two events. See text comment number 10.)

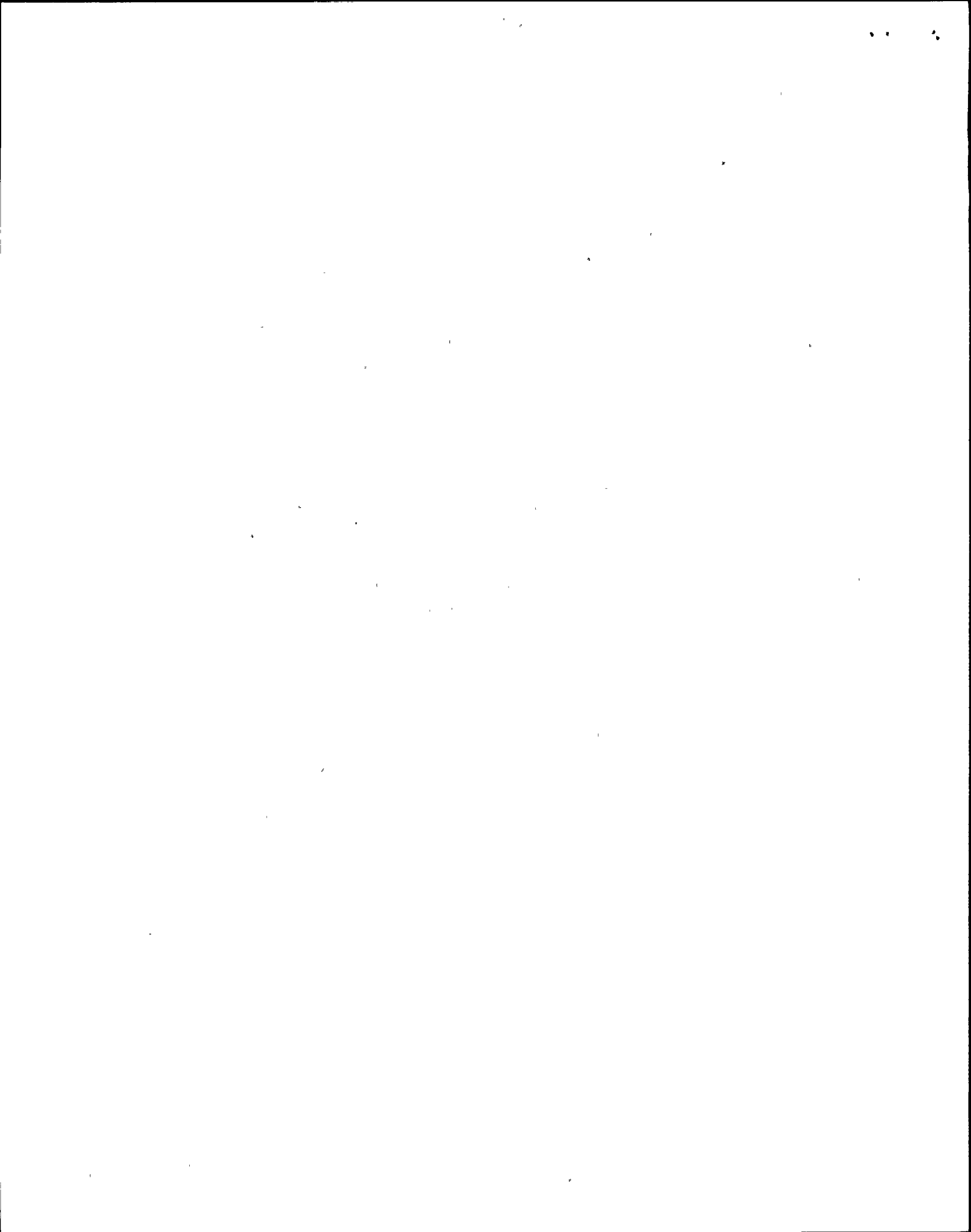


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
7. LER Number: . 86-012-00	
Scores: Text = 8.6 Abstract = 9.5 Coded Fields = 9.2 Overall = 8.9	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 2. <u>50.73(b)(2)(11)(I)</u>--Discussion of the method of discovery of the Technical Specification Violation is not included. 3. <u>50.73(b)(2)(11)(J)(2)</u>--More detail about how the error occurred would be helpful (e.g., person in too much of a hurry). <u>50.73(b)(2)(11)(J)(2)(iv)</u>--Discussion of the type of personnel involved (e.g., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) is not included. 4. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. No comment.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Cause (personnel error) is not included.

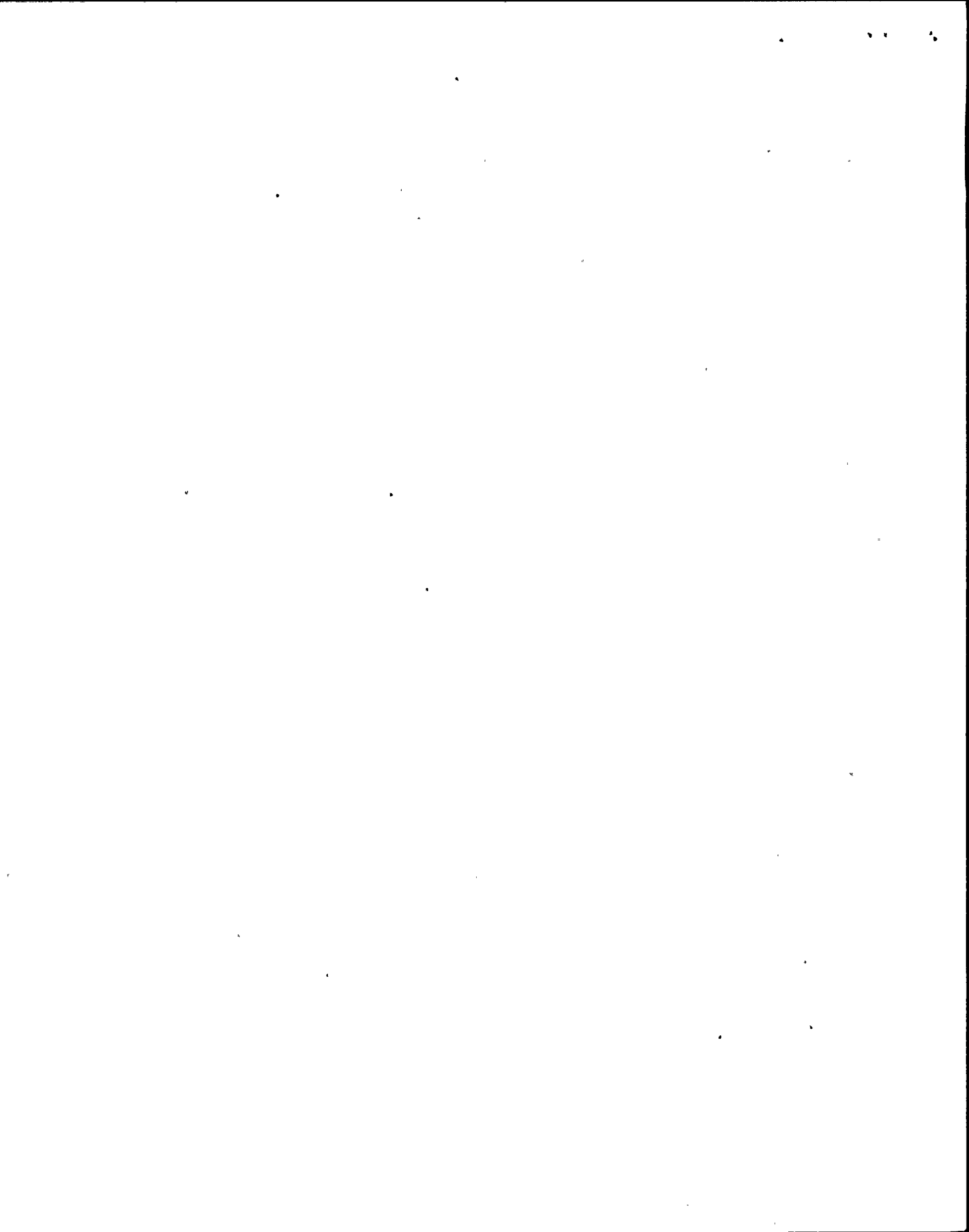


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
8. LER Number: 86-016-00	
Scores: Text = 7.3 Abstract = 8.6 Coded Fields = 8.5 Overall = 7.8	
Text	<ol style="list-style-type: none"> <li data-bbox="403 430 1215 558">1. <u>50.73(b)(2)(i)(C)</u>--Date/time information is inadequate for the 1984 refueling outage modifications and the 1986 refueling outage modifications. <li data-bbox="403 592 1351 690">2. <u>50.73(b)(2)(i)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. <li data-bbox="403 724 1356 852">3. <u>50.73(b)(2)(i)(J)(2)</u>--Discussion of the personnel error/procedural deficiency is inadequate. Why were the 1984 limit switch modifications not tested immediately after installation? <u>50.73(b)(2)(i)(J)(2)(iv)</u>--Discussion of the type of personnel involved (e.g., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) is not included. <li data-bbox="403 1052 1356 1150">4. <u>50.73(b)(2)(i)(L)</u>--It would be helpful to state the manufacturer and model number of the limit switches, which were incorrectly procured. <li data-bbox="403 1184 1371 1379">5. <u>50.73(b)(4)</u>--Discussion of corrective actions taken or planned is inadequate. A discussion of actions required to reduce the probability of recurrence (i.e, correction of the root cause) is inadequate. What actions were taken to ensure adequate testing of future modifications immediately after installation? A supplemental report would be appropriate to describe the results of the Design Engineering modifications of the limit switches if these results significantly change the reader's perception of the event and/or require additional corrective actions be taken. <li data-bbox="403 1640 1351 1732">6. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.

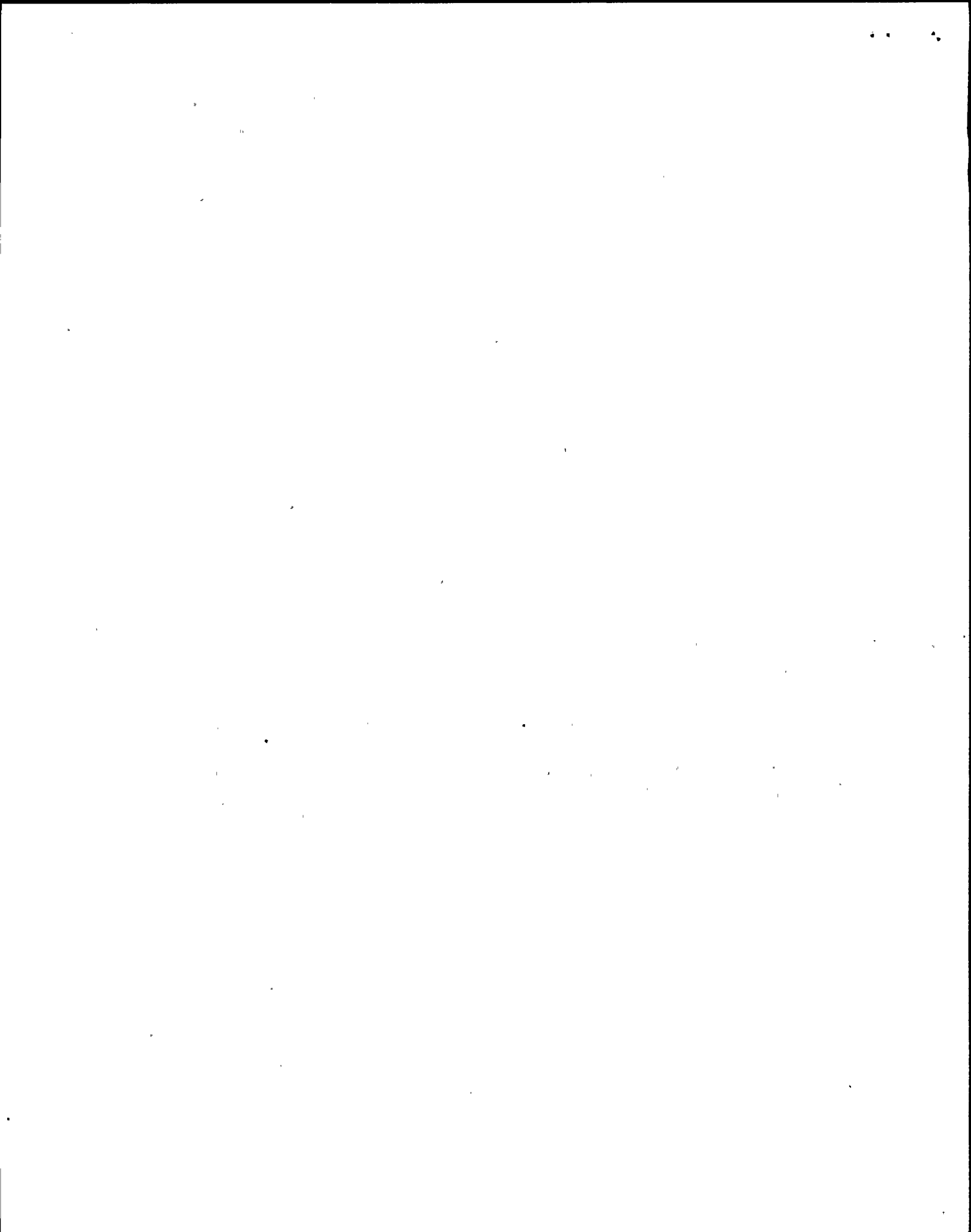


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
8. LER Number: 86-016-00 (Continued)	
	<p>7. Acronym(s) and/or plant specific designator(s) are undefined. "N1-POT-2338" and "SORC" are undefined.</p> <p>8. Some ideas are not presented clearly (hard to follow). The number of switches, the number of contacts, and the number of flow control valves involved with each modification is not clear in the text. The concept of the "reset or dead band" also is not clearly presented.</p>
Abstract	<p>1. <u>50.73(b)(1)</u>--Summary of occurrences [immediate cause(s) and effects(s)] is inadequate. The 1984 outage modifications are not included.</p> <p>2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate for the same reasons discussed in text comment number 5.</p> <p>3. OBSERVATION: The abstract is intended to be a summary of the text; therefore, the text must include all information summarized in the abstract. This abstract contains information that was not included in the text. The additional information concerning the channel 12 feedwater flow control valve and the high reactor water level sustained for ten seconds to automatically trip the feedwater pumps is not adequately presented in the text.</p>
Coded Fields	<p>1. <u>Item (4)</u>--Title: Cause (personnel error) and link (testing of modifications) are not included.</p>

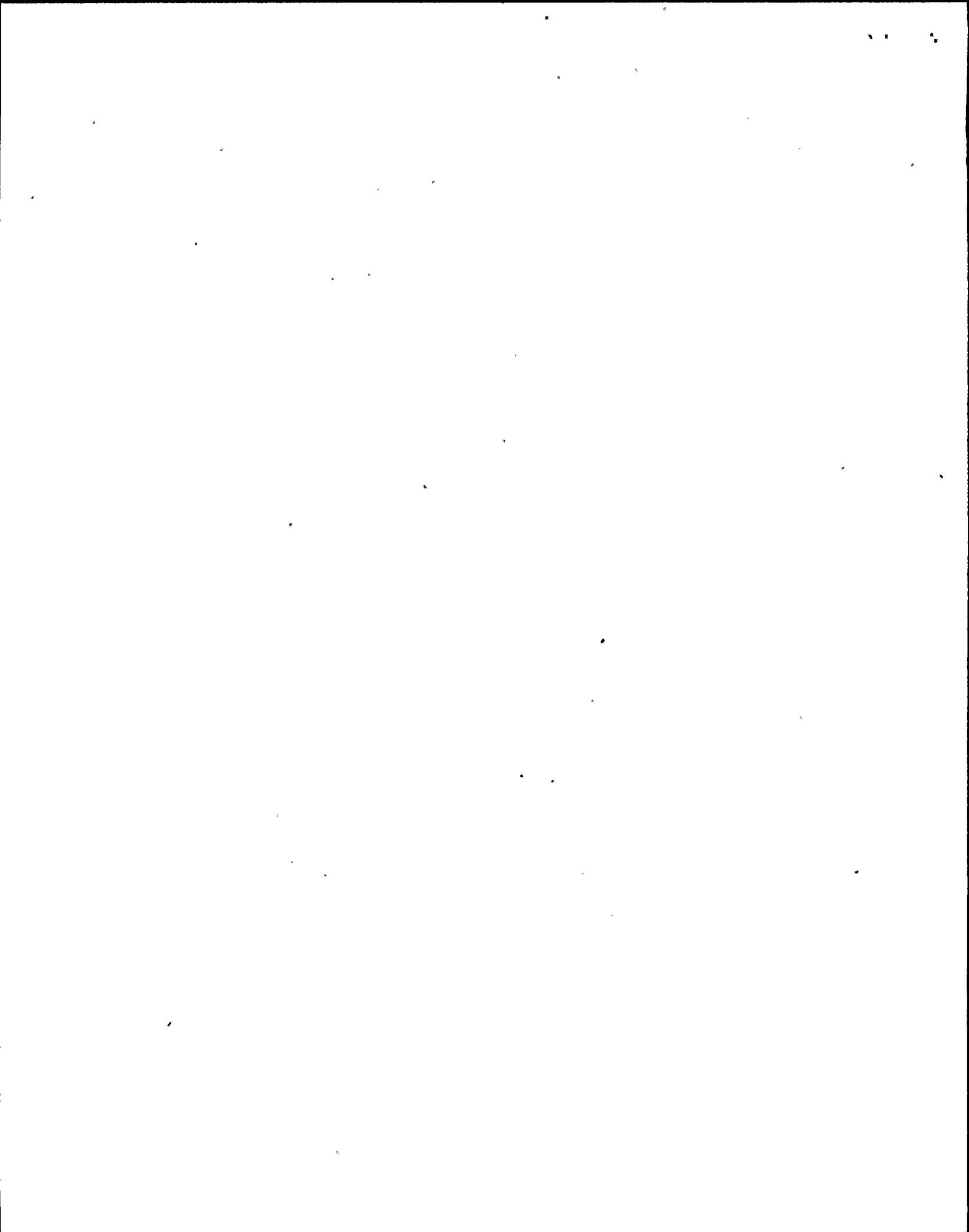


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
9. LER Number: 86-017-00	
Scores: Text = 8.5 Abstract = 8.5 Coded Fields = 9.2 Overall = 8.6	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(C)</u>--The date of the procedure change and satisfactory completion on the surveillance test would be good information to provide. 2. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 3. <u>50.73(b)(2)(ii)(J)(2)</u>--Discussion of the personnel error/procedural deficiency is inadequate. Was the "further lowering of the reactor water level in an attempt to increase the rate at which the flow control valve was opening" part of the surveillance procedure or did the operator do this on his own? Was there a low level alarm prior to the scram? <u>50.73(b)(2)(ii)(J)(2)(iv)</u>--Discussion of the type of personnel involved (e.g., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) is not included. 4. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state. 5. The text appears to contradict itself. For example, the third sentence of the third paragraph on page 2 of 3 appears to tell the reader that the actual water level does not change during the surveillance test.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of system responses is inadequate. The fact that "no other ESF system was affected" should have been mentioned in the abstract. 2. <u>50.73(b)(1)</u>--Summary of cause information is inadequate. The abstract should state that procedural deficiency was the cause of the event. 3. More of the background information that is provided in the text is needed in the abstract. Additional space is available within the abstract field to provide the necessary information but it was not utilized.

TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
9. LER Number: 86-017-00 (Continued)	
Coded Fields	1. <u>Item (4)</u> --Title: . Cause (procedural deficiency) is not included.

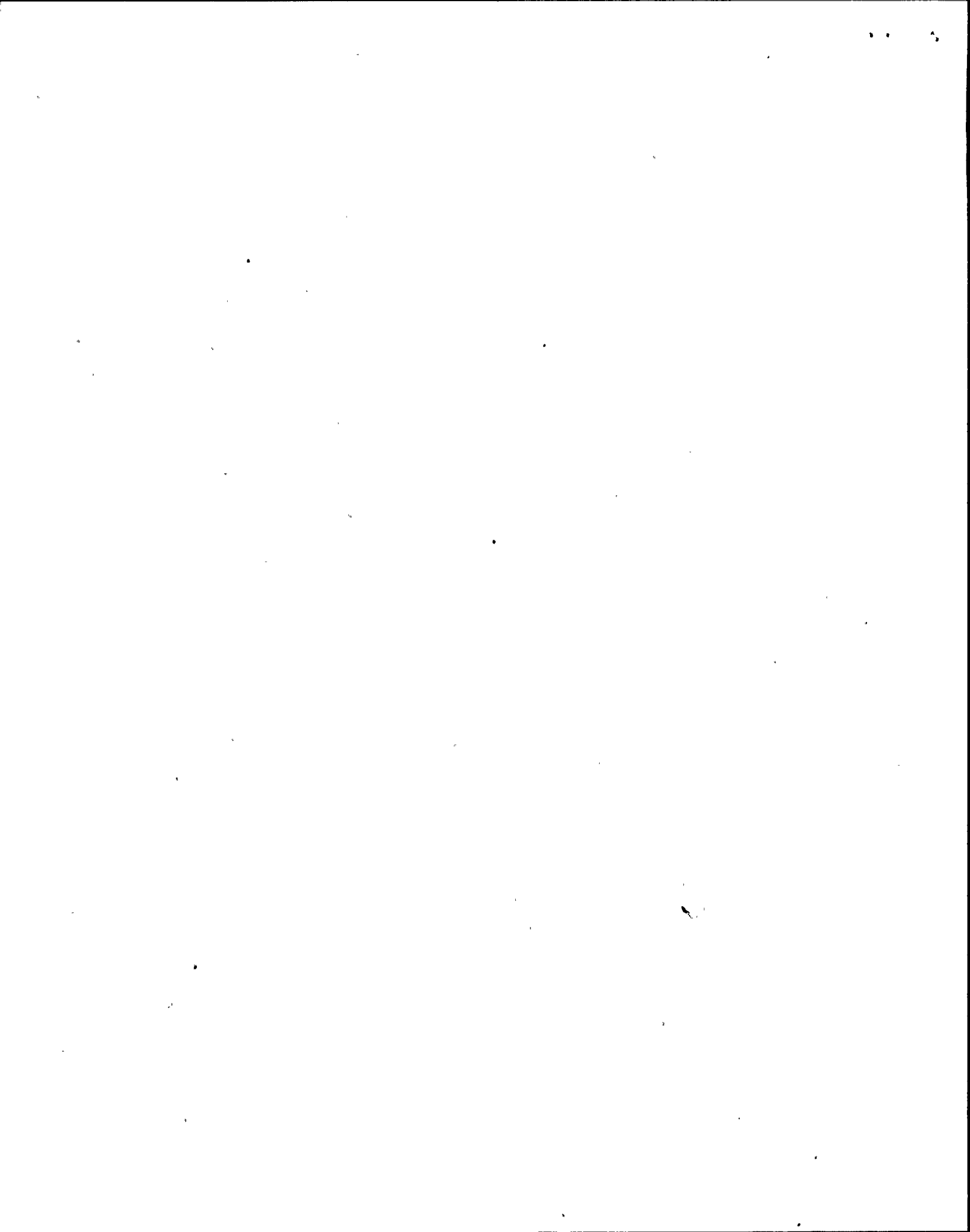


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
10. LER Number: 86-019-01	
Scores: Text = 8.2 Abstract = 8.9 Coded Fields = 8.2 Overall = 8.4	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(11)(C)</u>--Dates and times are inadequate. Additional dates/times are needed for important occurrences during the event (e.g., corrective actions). 2. <u>50.73(b)(2)(11)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 3. <u>50.73(b)(2)(11)(H)</u>--A time estimate of the unavailability of the failed train/system is not included (see text comment 1). 4. <u>50.73(b)(3)</u>--With the worth minimizer inoperable, could a rod actually be moved out of sequence? If so, the possible consequences of moving the wrong rod should be discussed along with safeguards that would help minimize the consequences. 5. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause does not state that the problem was an indexing error in the computers software. 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. The update to the procedure and further investigation by G.E. were not mentioned. 3. The abstract contains greater than 1400 spaces. By keeping the abstract to less than 1400 characters it will be able to fit in the space provided on page one.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Cause (computer software error) is not included. The use of acronyms in the title should be avoided unless space is a problem. 2. <u>Item (14)</u>--Neither "Yes"/"No" block of the supplemental report field is checked.

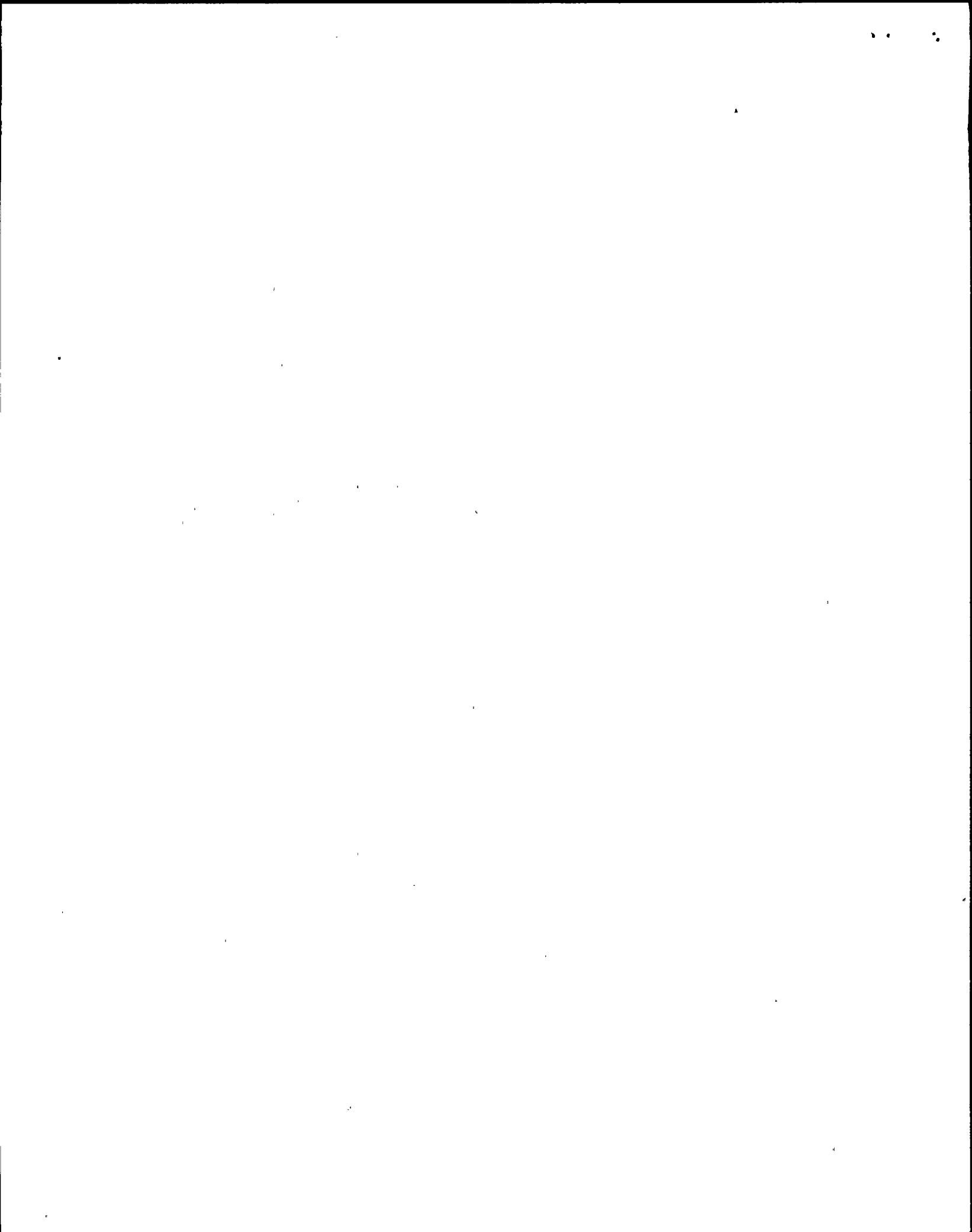


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
11. LER Number: 86-020-00	
Scores: Text = 8.9 Abstract = 8.5 Coded Fields = 8.5 Overall = 8.7	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(C)</u>--Date/time information for the completion of repairs, the testing of the sample line disconnection, and the return of the plant to startup mode is not included. 2. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 3. <u>50.73(b)(2)(ii)(J)(2)</u>--It appears that personnel error and/or procedural deficiency may be involved in this event, but it is not discussed. Why was the sample line not hydrostatically leak-tested after the completion of all welding? 4. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause information for the sample line leak and the failure to hydrostatically leak-test after all welding was completed is not included. 2. Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Cause information (pre-existing pipe flow and failure to hydrostatically leak-test in timely manner) and link (discovered during visual inspection) is not included.

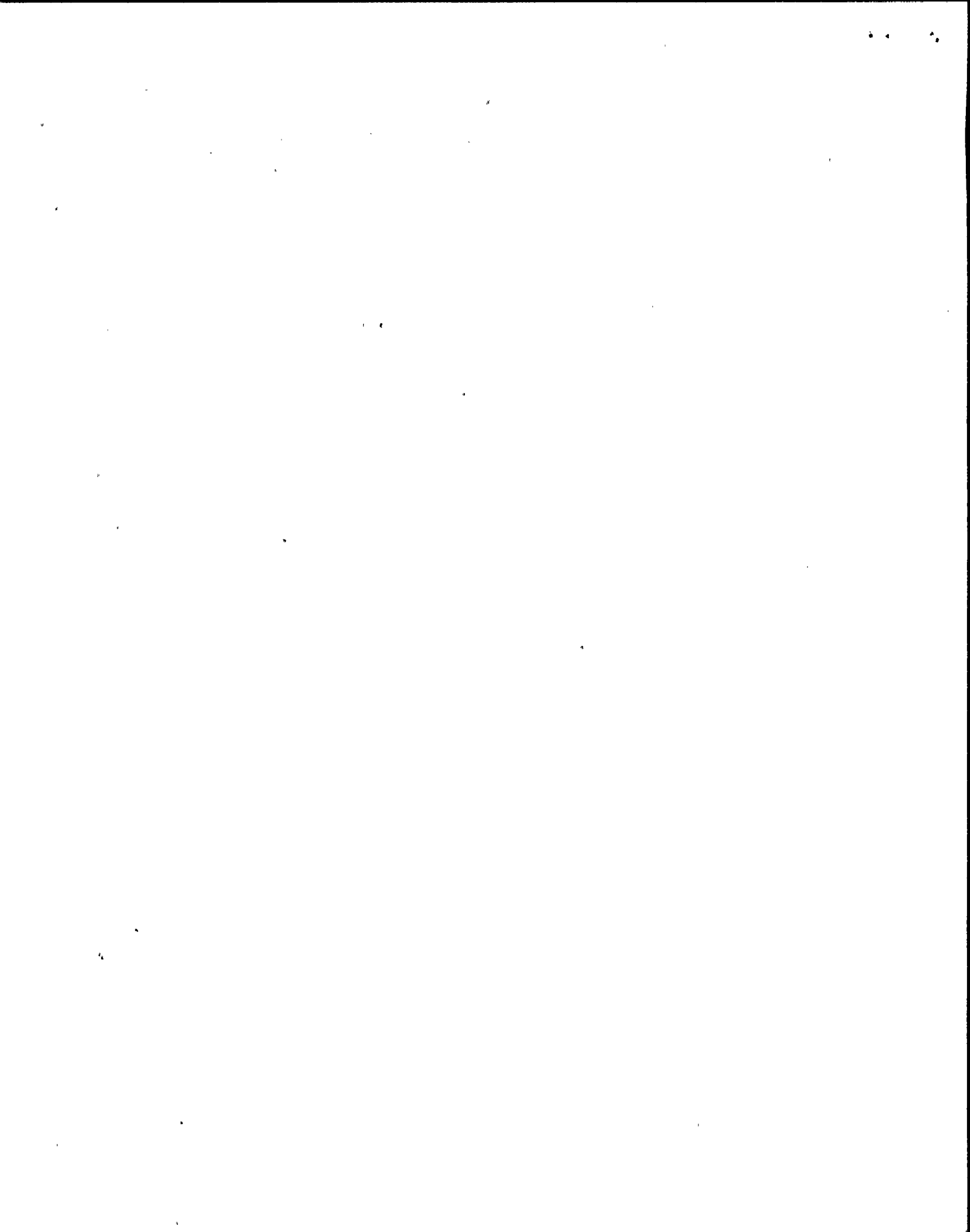


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
12. LER Number: 86-021-00	
Scores: Text = 8.9 Abstract = 9.0 Coded Fields = 9.0 Overall = 8.9	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(1)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 2. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of cause information is inadequate. The fact that the cause of the spurious noise spike is not known should be mentioned in the abstract. 2. The first sentence of the second paragraph of the abstract can give the reader the mistaken idea that the fuse replacement caused the event.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Cause information is not included and the link is inadequate. The fact that the cause of the IRM spike was not determined should have been included in the title. For example, "Reactor Scram and HPCI Initiation Occurred During Maintenance Activities Due To An IRM Noise Spike of Unknown Origin."

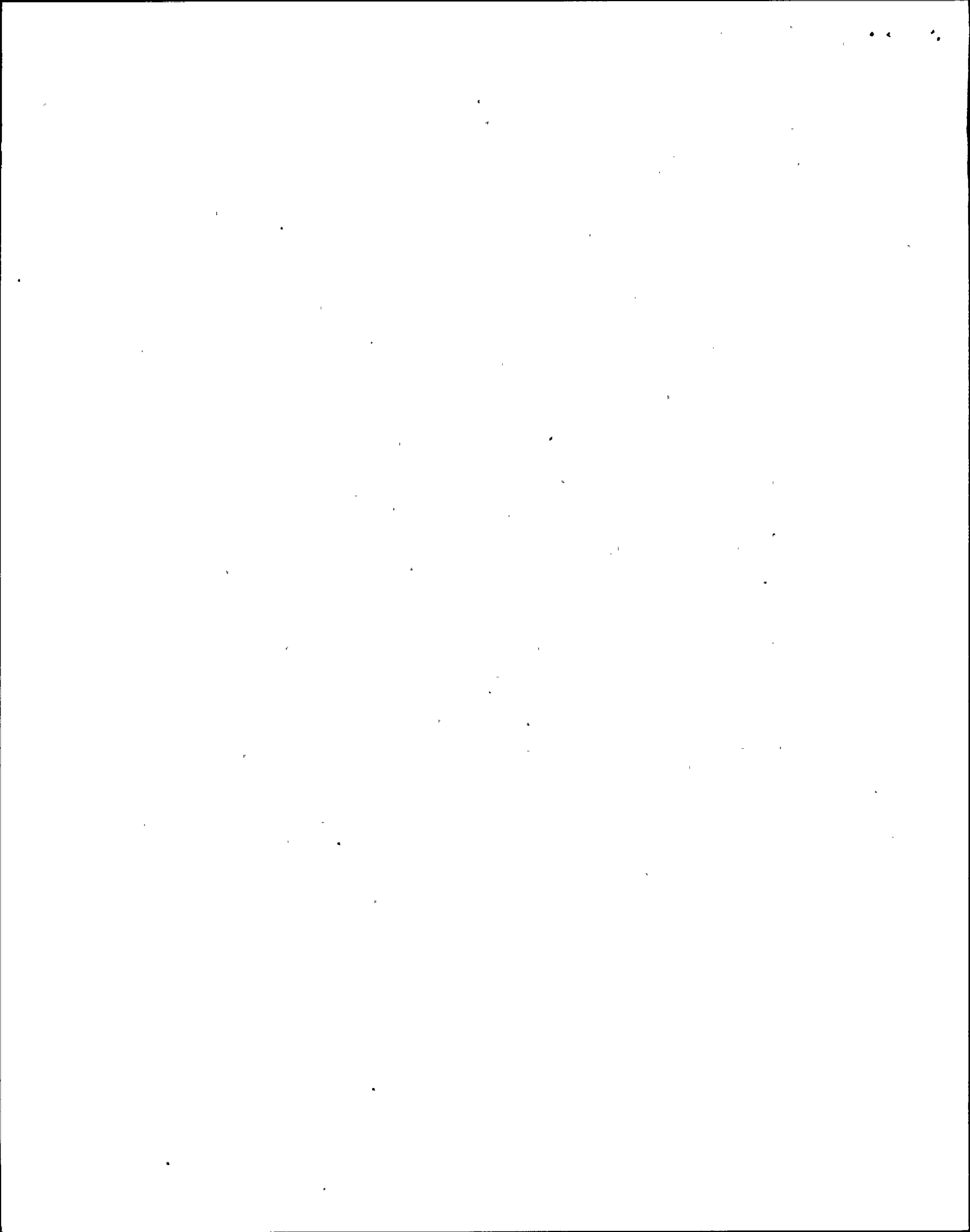


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
13. LER Number: 86-028-00	
Scores: Text = 8.3 Abstract = 8.8 Coded Fields = 8.8 Overall = 8.5	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(A)</u>--Information concerning the plant operating conditions before the event is not included. 2. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 3. <u>50.73(b)(2)(ii)(I)</u>--Discussion of the method of discovery of the sampling problem is inadequate. It would be helpful to know what activity led to the discovery of the closed valve. 4. <u>50.73(b)(2)(ii)(J)(2)(iv)</u>--Discussion of the type of personnel involved (e.g., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) is not included. 5. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. Corrective Action text Items 2 and 3 were not summarized. 2. Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (3)</u>--Page number on page two is not included. 2. <u>Item (4)</u>--Title: Link (maintenance activity) and cause information (sample valve closed) are not included.

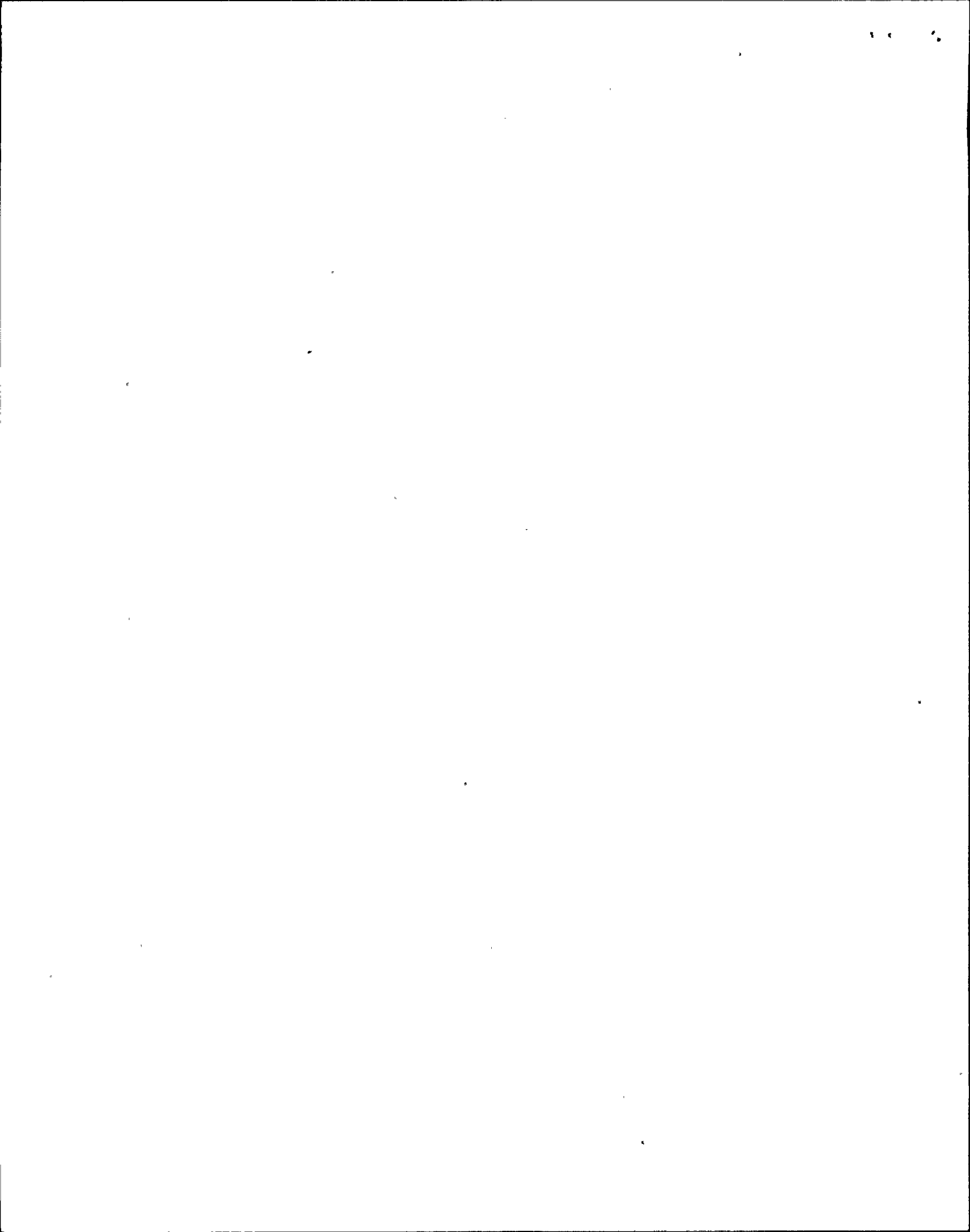


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
14. LER Number: 86-029-00	
Scores: Text = 8.4 Abstract = 9.5 Coded Fields = 8.5 Overall = 8.8	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(A)</u>--Information concerning the plant operating conditions before the event is not included. 2. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 3. <u>50.73(b)(2)(ii)(I)</u>--Discussion of the method of discovery of the failure to perform the surveillance test is inadequate. Who performed the review of the 1986 surveillance test schedule? 4. <u>50.73(b)(2)(ii)(J)(2)(iv)</u>--Discussion of the type of personnel involved (e.g., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) is not included. Who (by type of personnel or title) was the "responsible personnel" who failed to comply with the Technical Specification requirements? 5. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause information concerning personnel type is inadequate. See text comment number 4.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Cause information (inadequate procedure for test interval) and link (discovered during a review of the surveillance test schedule) are not included.

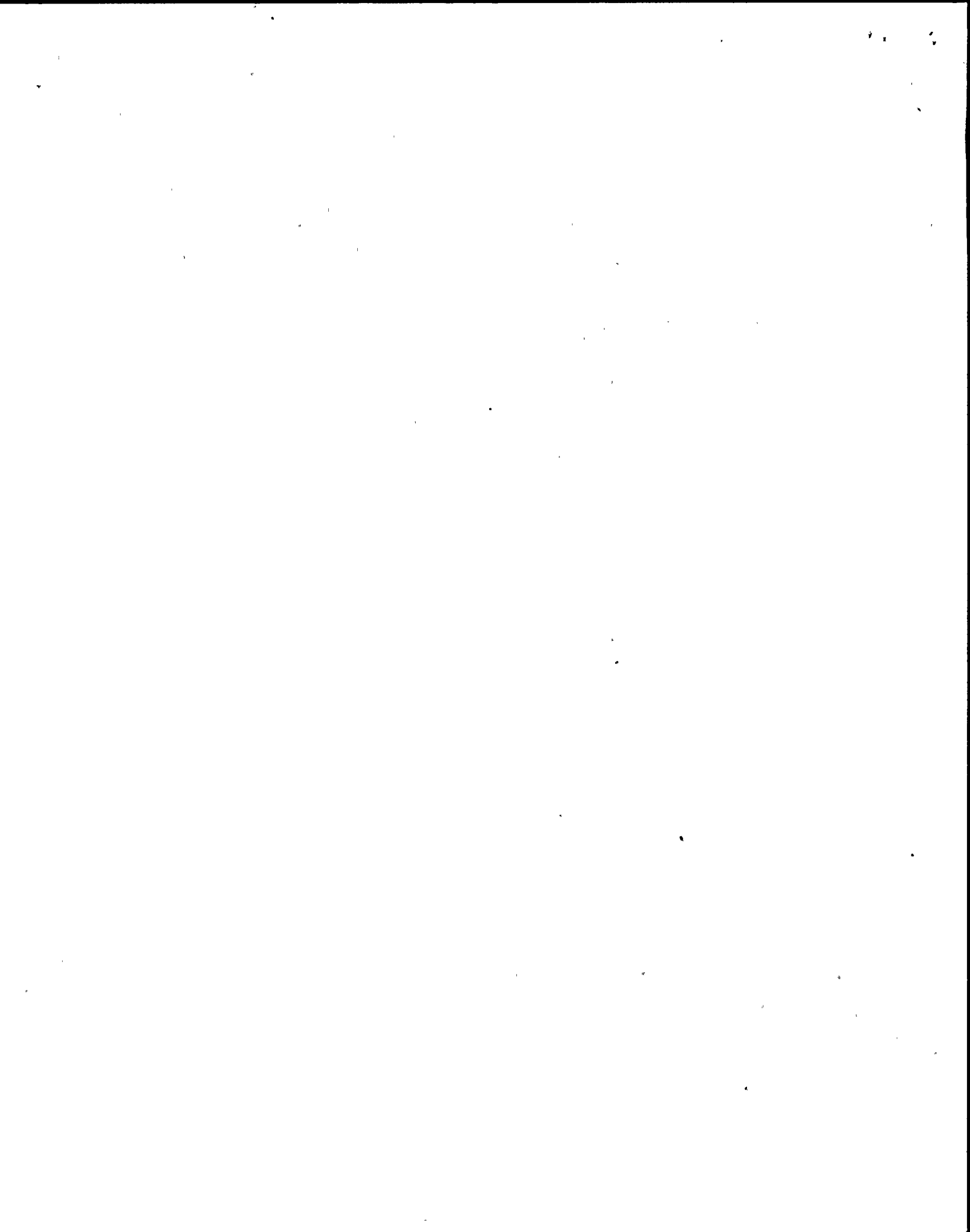


TABLE D-1. SPECIFIC LER COMMENTS FOR NINE MILE POINT 1 (220)

Section	Comments
75. LER Number: 86-032-00	
Scores: Text = 9.1 Abstract = 9.0 Coded Fields = 8.5 Overall = 9.0	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System code for each component and/or system referred to in the text is not included. 2. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. The abstract should indicate that no corrective actions were considered necessary to prevent recurrence of this or similar events. 2. OBSERVATION: The abstract is intended to be a summary of the text; therefore, the text must include all information summarized in the abstract. This abstract contains information that was not included in the text. The fact that the I&E Personnel was "qualified" was not included in the text.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Cause and link information are not provided.

