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|                | Nine Mile Point Nuclear |            | it 2, Niagara M | Ioha 05000410 |
| AUTH . NAME    | AUTHOR AFFILIATION      |            |                 |               |
| JENKINS, R.E.  | Niagara Mohawk Powe     |            |                 | I.            |
| LEMPGES, T.E.  | Niagara Mohawk Powe     | er Corp.   |                 |               |
| RECIP.NAME     | RECIPIENT AFFILIAT      |            |                 |               |
|                |                         |            |                 |               |
|                |                         |            |                 |               |

SUBJECT: LER 88-010-00:on 880212, missed surveillance fue to personnel error results in TEch Spec violation.

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| LICENSEE EVENT REPORT (LER)   | ROVED OMB NO. 31504<br>IRES: 8/31/88                  | -                  |
|---|---|--------------------|
|   |   |                    |
| FACILITY NAME (1) DOCKET NUMBER (2)   |   | GE (3)             |
| Nine Mile Point Unit 2<br><sup>TITLE (4)</sup> Missed Surveillance due to Personnel Error   | 410 10  | <u>-1_04_</u>      |
| Results in Technical Specification Violation  |   |                    |
| EVENT DATE (5) LER NUMBER (6) REPORT DATE (7) OTHER FACILITIES INVOLVED   |   |                    |
| MUNIH DAY TEAR TEAR WIN NUMBER WORTH CAT FEED   | CKET NUMBER(S)  |                    |
|   | <u>1</u> 111  |                    |
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| OPERATING<br>MODE (9)     1     20.402(b)     20.405(c)     50.73(e)(2)(iv)   | 73.71(b)  |                    |
| POWER     20,405(a)(1)(i)     50,38(c)(1)     50,73(a)(2)(v)       LEVEL  | 73.71(c)  |                    |
| (10) 098 20.405(s)(1)(iii) 50.38(c)(2) 50.73(s)(2)(vii)   | OTHER (Specify in A<br>below end in Text, Ni<br>365A) | bstrect<br>RC Form |
| 20,405(a)(1)(iii)<br>20,405(a)(1)(iii)<br>20,405(a)(1)(iv)<br>50,73(a)(2)(iii)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(A)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(viii)(B)<br>50,73(a)(2)(Viii)(B)<br>50,73(a)(2)(Viii)(B)<br>50,73(a)(2)(Viii)(B)<br>50,73(a)(2)(Viii)(B)<br>50,73(a)(2)(Viii)(B)<br>50,73(a)(2)(Viii)(B)<br>50,73(a)(2)(Viii)(B)<br>50,73(a)(2)(Viii)(B)<br>50,73(a)(2)(Viii)(B)<br>50,73(a)(2)(Viii)(B)<br>50,73(a)(C)(C)(C)<br>50,73(a)(C)(C)(C)(C)<br>50,73(a)(C)(C)(C | 30047   |                    |
| 20.408(a)(1)(v) 50.73(a)(2)(iii) 50.73(a)(2)(x)   |   |                    |
| LICENSEE CONTACT FOR THIS LER (12)  |   |                    |
| NAME AREA CODE  | EPHONE NUMBER   |                    |
| Robert E. Jenkins, Assistant Supervisor Technical Support 315 3   | 349-4220  |                    |
| COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)  |   |                    |
|   | EPORTABLE<br>TO NPRDS                                 |                    |
|   |   |                    |
|   |   |                    |
| SUPPLEMENTAL REPORT EXPECTED (14)   | MONTH DAY   | YEAR               |
| EXPECTED SUBMISSION DATE (16)   |   |                    |
| YES /// yes, complete EXPECTED SUBMISSION DATE) X NO  |   |                    |
| On February 24, 1988 at 0830 hours it was discovered that Nine Mile P<br>2 (NMP2) was in violation of the surveillance requirement for Technic  | cal   |                    |
| Specification (TS) 3.10.5. The surveillance requirement states that<br>effective full-power days of operation shall be verified to be less t<br>by calculation, at least once per seven days during the Startup Test<br>Contrary to this requirement, the corresponding surveillance procedur<br>performed between February 5 and February 24, 1988. At the time of t   | than 120,<br>Program.<br>re was not                   |                    |
| discovery, NMP2 was at approximately 98 percent of rated thermal powe   | er.   |                    |
| The root cause of the event has been determined to be personnel error<br>Reactor Analyst Supervisor temporarily assigned Department personnel<br>duties without assuming responsibility or providing sufficient suppor<br>performance of the required surveillances.  | to other  |                    |
| Immediate corrective action was to perform the required surveillance<br>total core exposure to be less than 120 effective full power days.  | and verify  |                    |
| Immediate corrective action was to perform the required surveillance<br>total core exposure to be less than 120 effective full power days.<br>Additional corrective actions include hiring an assistant supervisor<br>the workload demands of the Reactor Analyst Supervisor. Also, survei<br>procedures will now be scheduled by the Planning Department. This sc<br>will be maintained by both the Reactor Analyst Supervisor and the Rea<br>Analyst technician stationed in the control room. The technician in<br>control room will serve as a check that surveillances are performed a   | illance<br>chedule<br>actor<br>the                    | 2P                 |
| required.   |   | ,                  |

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|--------------|------------------------|---------------------------|------|-----|----------------------|-----|--------------------|----------|-----|----------------|
| ,            | FACILITY NAME (1)      | DOCKET NUMBER (2)         |      | LE  | R NUMBER (6)         |     |                    | P.       | AGE | 3)             |
|              |                        |                           | YEAR | *** | SEQUENTIAL<br>NUMBER |     | REVISION<br>NUMBER |          |     |                |
|              | Nine Mile Point Unit 2 | 0  5   0   0   0   4 1 0  | 88   |     | 010                  |     | 00                 | 02       | OF  | 04             |

### TEXT (If more space is required, use additional NRC Form 305A's) (17)

### I. DESCRIPTION OF EVENT

On February 24, 1988 at 0830 hours it was discovered that Nine Mile Point Unit 2 (NMP2) was in violation of the surveillance frequency requirement for Technical Specification (TS) 3.10.5. The surveillance requirement states that the effective full-power days of operation shall be verified to be less than 120, by calculation, at least once per seven days during the Startup Test Program. Contrary to this requirement, the corresponding surveillance procedure was not performed between February 5 and February 24, 1988. At the time of the discovery, NMP2 was at approximately 98 percent of rated thermal power.

Subsequent to verifying total core exposure to be less than 120 effective full power days on February 5, the NMP2 Reactor Analyst Department was requested to provide assistance to the Nine Mile Point Unit 1 (NMP1) Reactor Analyst Department. NMP1 had entered an earlier than scheduled refueling outage. This resulted in a temporarily high demand on Reactor Analyst Department personnel for both NMP1 and NMP2. Providing assistance to NMP1 interrupted the normal NMP2 Reactor Analyst Department staff functions, which included monitoring the performance of surveillance procedures. Without the surveillance schedule monitored, the applicable surveillance procedure N2-RPSP-11, "Calculation of Integrated Thermal Generation", was not properly identified to be performed until February 24.

There were no components or systems which were inoperable and/or out of service which contributed to the event. No plant system or component failures resulted from the event.

## II. CAUSE OF EVENT

The root cause of the event has been determined to be personnel error. Once personnel from the NMP2 Reactor Analyst Department were assigned to provide assistance to the NMP1 refueling outage, the Reactor Analyst Supervisor should have assumed the responsibility or provided sufficient support for performance of the required surveillances. ri

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|   | Nine Mile Point Unit 2 | 0 15 10 10 10 1 410     | 88   | _  | 010                  | _   | 00                                | 03       | OF    | 04 |

### TECT (If more space is required, use additional NRC Form 305A's) (17)

### III. ANALYSIS OF EVENT

This event is considered reportable in accordance with 10CFR50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications.

The provisions of TS 3.6.6.2 require maintaining the drywell and suppression chamber atmosphere oxygen concentration to less than 4% by volume. TS 3.10.5 permitted the provisions of TS 3.6.6.2 to be suspended during the Startup Test Program until either the required 100% of rated thermal power trip tests had been completed or the reactor had operated for 120 effective full-power days. Relief from the oxygen concentration specification was necessary in order to provide access to the primary containment during the initial startup and testing phase of operation. Although the specific surveillance test, N2-RPSP-11, was not performed at the required interval, reactor core exposure is determined by the Reactor Analyst Department on a daily basis. This daily updating documented a total core exposure of only 39.21 effective full power days by February 24, 1988. With this amount of total core exposure, the reactor would have to have been operated at 100 percent of rated thermal power for 80 days prior to exceeding the Technical Specification limit of 120 effective full power days. Having total core exposure determined on a daily basis by the reactor analyst technician stationed in the control room, if the 120 effective full power days limit was approached, it would have been identified and appropriate actions initiated. Therefore, while the specified surveillance had not been properly performed, total core exposure was being monitored daily and no significant safety hazard existed.

NMP2 was in violation of TS 3.10.5 from February 12, 1988, when the specified surveillance was next required to be performed, until February 24, 1988 when the missed surveillance was identified and performed, for a total of 12 days.

As of March 11, 1988 NMP2 completed the Startup Test Program and entered commercial operation, thus making the requirements of TS 3.10.5 no longer applicable for NMP2.

# IV. CORRECTIVE ACTION

Immediate corrective action was to perform the required surveillance and verify total core exposure to be less than 120 effective full power days.

Additional corrective actions include hiring an assistant supervisor to reduce the workload demands of the Reactor Analyst Supervisor. The scheduled start date for the assistant supervisor is mid-May, 1988. Also, surveillance procedures, except those performed on a less than daily basis, will now be scheduled by the Planning Department. This schedule will be maintained by both the Reactor Analyst Supervisor and the Reactor Analyst technician stationed in the control room. Monitoring of surveillance procedures by the technician in the control room will serve as a check that surveillances are performed as required.

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| LICENSEE EV   | T REPORT (LER) TEXT CONTINU | АТ   | ų  | U.     | AF    | PROVED | омв NO. |      |     |
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| Nine Mile Point Unit 2  | 0 5 0 0 0 410               | 88   | _  | 010    | _     | 00     | 04      | 0    | F O |
| OCT (If more space is required, use additional HIRC Form 305A's) (17) | ,                           |  |    |        |       |        |         |      |     |
| V. ADDITIONAL INFORM  | ATION                       |  |    |        |       |        |         |      |     |
| Identificatio   | n of Components Referred to | n thi  | is | LER    |       |        |         |      |     |
| Component   | IEEE 803<br>EIIS Funct      | EXPRES: PAGE 13   IS IS IS IS PAGE 13   IS IS IS IS IS PAGE 13 |    |        |       |        |         |      |     |
| Containment Environmenta<br>Monitoring System                         | 1                           | •  |    |        | -     |        |         |      |     |
| There have been no previ  | ous similar events at NMP2. |  |    |        |       |        |         | PAGE |     |
| Component Failures - Non  | 2.                          |  |    |        |       |        | 04 OF   |      |     |
|   |                             |  |    |        |       |        |         |      |     |
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### NIAGARA MOHAWK POWER CORPORATION



RA MOHAWK

301 PLAINFIELD ROAD SYRACUSE, NY 13212



THOMAS E. LEMPGES

March 24, 1988

United States Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

RE: Docket No. 50-410 LER 88-10

Gentlemen:

In accordance with 10 CFR 50.73, we hereby submit the following Licensee Event Report:

LER 88-10 Is being submitted in accordance with 10 CFR 50.73 (a) (2) (i) (B), "Any operation or condition prohibited by the plant's Technical Specifications".

A 10CFR50.72 report was made at 0920 hours on February 24, 1988.

This report was completed in the format designated in NUREG-1022, Supplement 2, dated September 1985.

Very truly yours,

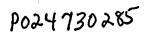
homas Edmpges

Thomas E. Lempges Vice President Nuclear Generation

TEL/JTD/mjd

Attachments

cc: Regional Administrator, Region 1 Sr. Resident Inspector, W. A. Cook



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