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ACCESSION NBR: 8808120284 DOC. DATE: 88/08/05 NOTARIZED: NO DOCKET #
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moho 05000410
 AUTH. NAME AUTHOR AFFILIATION
 JENKINS, R.E. Niagara Mohawk Power Corp.
 WILLIS, J.L. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-027-00: on 880707, Tech Spec violation due to failure
 to submit to special rept because of personnel error. W/8 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

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	AEOD/DSP/ROAB	2	2	AEOD/DSP/TPAB	1	1
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	NRR/DEST/ESB 8D	1	1	NRR/DEST/ICSB 7	1	1
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	NRR/DEST/SGB 8D	1	1	NRR/DLPQ/HFB 10	1	1
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	RES/DSIR DEPY	1	1	RES/DSIR/EIB	1	1
	RES/DSR DEPY	1	1	RGN1 FILE 01	1	1
EXTERNAL:	EG&G WILLIAMS, S	4	4	FORD BLDG HOY, A	1	1
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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Nine Mile Point Unit 2						DOCKET NUMBER (2) 0 5 0 0 0 1 4 1 0			PAGE (3) 1 OF 04	
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TITLE (4) Technical Specification Violation due to Failure to Submit a Special Report Because of a Personnel Error

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
07	07	88	88	027	00	08	05	88	N/A		0 5 0 0 0
									N/A		0 5 0 0 0

OPERATING MODE (9) 1

POWER LEVEL (10) 100

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	Special Report
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Robert E. Jenkins, Assistant Supervisor Technical Support	AREA CODE 315 TELEPHONE NUMBER 349-4220

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On July 7, 1988 at 1454 hours, it was discovered that Nine Mile Point Unit 2 failed to submit a required Special Report and was not in compliance with its Technical Specifications (TS), Section 3.3.7.8, concerning the operability of the Loose Parts Monitoring (LPM) system. At the time of the discovery the plant was operating at approximately 100% of its rated thermal power with the reactor mode switch in the "RUN" position (Operational Condition 1). This Special Report was due in November, 1987.

The root cause of the event is a personnel error.

The immediate corrective action was to notify the responsible department of the need for a Special Report by issuing an Occurrence Report.

Corrective actions include: (1) The addition of the information required in the Special Report by TS Section 3.3.7.8 to this report in Section V, Additional Information; (2) Lessons Learned transmittal concerning the need of an occurrence report for the tracking of items requiring a special report and to address the need for accurate Equipment Status Log entries; (3) A document search of the equipment status log for any similar event; (4) Revision to Administrative Procedure AP-10.2.2, "Procedure for Reporting Variations from Normal Plant Operations, Defects and Non-Compliance" to assure that items that are subject to an Occurrence Report are better defined.

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Nine Mile Point Unit 2	05000410	88	027	00	02	OF	04

TEXT (If more space is required, use additional NRC Form 368A's) (17)

I. DESCRIPTION OF EVENT

On July 7, 1988 at 1454 hours, it was discovered that Nine Mile Point Unit 2 (NMP2) failed to submit a required Special Report and was not in compliance with its Technical Specifications (TS), Section 3.3.7.8, concerning the operability of the Loose Parts Monitoring (LPM) system. At the time of the discovery the plant was operating at approximately 100% of its rated thermal power with the reactor mode switch in the "RUN" position (Operational Condition 1).

On October 6, 1987 the LPM system was declared inoperable and entered into the NMP2 Equipment Status Log in accordance with Administrative Procedure AP-4.0, "Administration of Operations". Although the log sheet had addressed the applicable TS and required Limiting Condition for Operation (LCO), the index for the equipment status log had been marked for this entry as information only and not as an LCO item. This may have significantly hindered the identification of the log entry for TS items by Operations at shift turnovers.

No process, other than the equipment status log had been initiated to track the length of time which this system had been inoperable. Additionally, the department responsible for writing Special Reports at NMP2 was not notified in a timely manner that the Loose Parts Monitor system was removed from service. Therefore, a Special Report was not submitted. This condition lasted until the discovery date when a Niagara Mohawk Power Corporation (NMPC) engineer, investigating the inoperable system, determined that NMP2 was in violation of the TS.

II. CAUSE OF EVENT

The root cause of this event was a failure of the Operations Department to track the LPM system operability status and to notify the NMP2 Technical Support Department in a timely manner.

A contributing factor to this event is a procedural deficiency of the Site Administrative Procedure, AP-10.2.2, "Procedure for Reporting Variations from Normal Plant Operations, Defects, and Non-Compliance". This procedure does not require the generation of an Occurrence Report (OR) when equipment is removed from service for which TS may require a Special Report be prepared.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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Nine Mile Point Unit 2	0 5 0 0 0 410	88	027	00	03	OF	04

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

On two previous occasions during 1987, Occurrence Reports had been initiated as a result of the inoperability of the LPM system. These Occurrence Reports had been used to track the need of a Special Report but in both cases, no report was required because the equipment was restored to service in less than 30 days. The inconsistency on the use of an Occurrence Report to track items which require Special Reports supports the deficiency of AP-10.2.2 as a contributing factor.

III. ANALYSIS OF EVENT

The event is considered reportable via 10CFR50.73 (a)(2)(i)(B) because the failure to submit a Special Report, within the required time period, is not in compliance with the plant's Technical Specifications.

The total duration of the event was from November 15, 1987 to the date of submittal of this report, August 5, 1988, approximately 9 1/2 months.

The LPM system is intended to be used for information purposes only and is not a safety-related system. The operators do not rely solely on the LPM system or information provided by the system for the performance of any safety-related action. Any evaluation or action taken to confirm the presence of a loose part is handled on a case-by-case basis.

At no time was the public health, safety or ability to shutdown or operate the plant adversely affected.

IV. CORRECTIVE ACTIONS

The immediate corrective action was to notify the responsible department of the need for a Special Report through the writing of Occurrence Report 88-95.

The Special Report required by TS Section 3.3.7.8 has been incorporated into this LER. A copy of this report will be concurrently submitted to complete the TS requirements for a Special Report. Therefore, submission of this LER/Special Report satisfies the requirements of TS Section 3.3.7.8 bringing NMP2 back into compliance with TS 3.3.7.8.

A document search is being conducted in order to determine that a similar situation (item requiring a Special Report) has not occurred. The equipment status log was reviewed from October 31, 1986 (issue date of NMP2 Low Power License) to the present time to satisfy this requirement. This review is expected to be completed by September 1, 1988.

A Lessons Learned Transmittal has been submitted to the Operations Department concerning the need for an Occurrence Report for the tracking of any event which could result in the need for a Special Report and to address the need for accurate entries in the Equipment Status Log.

AP-10.2.2, "Procedure for Reporting Variations from Normal Plant Operations, Defects and Non-Compliance", will be revised to more clearly define what type of events are reportable on an Occurrence Report. This change will help assure consistency in the use of the Occurrence Reports in reporting variations of normally expected plant operation.



LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR 88	SEQUENTIAL NUMBER 027	REVISION NUMBER 00	04	OF

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

V. ADDITIONAL INFORMATION

A. Identification of Components Referred to in this LER

Component	IEEE 803 EIS Funct	IEEE 805 System ID
Loose Parts Monitoring System	N/A	II

B. Component Failures - None

C. There has been one related event of a missed Special Report caused by a programmatic deficiency (LER 88-03). In that case, Technical Support failed to recognize the need for a Special Report even though an OR was issued. There have been no other LERs concerning events similar to the event discussed in this report.

D. In compliance with TS Section 3.3.7.8, the following information is being provided.

CAUSE - On October 6, 1987 four channels of NMP2 Loose Parts Monitor (LPM) system were in the alarm condition and would not reset. Data being collected at that time, as part of the Power Ascension Test phase of NMP2, led to the determination that the cause of the problem is high background noise level due to mechanical vibration.

PLANS FOR RESTORATION - NMPC Engineering activities correct the problems involved interaction between the vendor, Architect/Engineer and other plants which have a similar monitoring system. Recommended corrective actions to make the NMP2 LPM system operational are as follows:

1. Modifications to the amplifier cards based on vendor recommendations.
2. Evaluating cable wiring layout design which could have contributed to the LPM system noise.
3. Procedural changes used in the calibration of the LPM system.

These changes are scheduled to be completed by the end of the mid-cycle outage.

NINE MILE POINT—UNIT 2/P.O. BOX 63, LYCOMING, NY 13093/TELEPHONE (315) 343-2110

August 5, 1988

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

RE: Docket No. 50-410
LER 88-27


Gentlemen:

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

LER 88-27 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".

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

Very truly yours,


J. L. Willis
General Superintendent
Nuclear Generation

JLW/TJS/mjd

Attachments

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

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