

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8809130312 DOC. DATE: 88/09/09 NOTARIZED: NO DOCKET #
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
 AUTH. NAME AUTHOR AFFILIATION
 DUELL, J.N. Niagara Mohawk Power Corp.
 WILLIS, J.L. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-041-00: on 880811, Tech Spec violation due to personnel error.

W/8 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	
	PD1-1 LA	1 1	PD1-1 PD	1 1	
	HAUGHEY, M	1 1	BENEDICT, R	1 1	
INTERNAL:	ACRS MICHELSON	1 1	ACRS MOELLER	2 2	
	ACRS WYLIE	1 1	AEOD/DOA	1 1	
	AEOD/DSP/NAS	1 1	AEOD/DSP/ROAB	2 2	
	AEOD/DSP/TPAB	1 1	ARM/DCTS/DAB	1 1	
	DEDRO	1 1	NRR/DEST/ADS 7E	1 0	
	NRR/DEST/CEB 8H	1 1	NRR/DEST/ESB 8D	1 1	
	NRR/DEST/ICSB 7	1 1	NRR/DEST/MEB 9H	1 1	
	NRR/DEST/MTB 9H	1 1	NRR/DEST/PSB 8D	1 1	
	NRR/DEST/RSB 8E	1 1	NRR/DEST/SGB 8D	1 1	
	NRR/DLPQ/HFB 10	1 1	NRR/DLPQ/QAB 10	1 1	
	NRR/DOEA/EAB 11	1 1	NRR/DREP/RAB 10	1 1	
	NRR/DREP/RPB 10	2 2	NRR/DRIS/SIB 9A	1 1	
	NUDOCS-ABSTRACT	1 1	REG FILE 02	1 1	
	RES TELFORD, J	1 1	RES/DSIR DEPY	1 1	
	RES/DSIR/EIB	1 1	RGN1 FILE 01	1 1	
EXTERNAL:	EG&G WILLIAMS, S	4 4	FORD BLDG HOY, A	1 1	
	H ST LOBBY WARD	1 1	LPDR	1 1	
	NRC PDR	1 1	NSIC HARRIS, J	1 1	
	NSIC MAYS, G	1 1			

TOTAL NUMBER OF COPIES REQUIRED: LTTR 47 ENCL 46

R
I
D
S
/
A
D
D
S
/
A
D
D
S



LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Nine Mile Point Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 410	PAGE (3) 1 OF 05
--	---	----------------------------

TITLE (4)
Technical Specification Violation due to 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)
08	11	88	88	041	00	09	09	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)

20.402(b)	20.405(c)	60.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	60.38(c)(1)	60.73(a)(2)(v)	73.71(c)
20.405(a)(1)(ii)	<input checked="" type="checkbox"/> 60.38(c)(2)	60.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 60.73(a)(2)(ii)	60.73(a)(2)(viii)(A)	
20.405(a)(1)(iv)	60.73(a)(2)(iii)	60.73(a)(2)(viii)(B)	
20.405(a)(1)(v)	60.73(a)(2)(iii)	60.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
James N. Duell, Supervisor Radiochemistry and Chemistry	AREA CODE 315 NUMBER 349-2426

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

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 August 11, 1988 at 1500 hours with the reactor mode switch in RUN (Operational Condition 1) and at a power level of approximately 100% of thermal capacity it was discovered that Nine Mile Point Unit 2 (NMP2) had not been in compliance with Technical Specification (TS) Section 3.3.7.9b since March 1, 1988. Specifically the Liquid Radwaste Effluent Radiation Monitor (2LWS-RE206) was inoperable for more than 30 days and an explanation of inoperability was not provided in the Semi-Annual Radiological Effluent Release Report (SARERR).

The root cause for this event is personnel error.

The corrective actions for this event are:

1. The 2LWS-RE206 inoperability was reported in the subsequent SARERR (submitted on August 30, 1988).
2. Lessons Learned Transmittals will be sent to the Operations, Technical Support and Chemistry Departments describing the events and errors each department made.
3. A revision will be made to AP-10.2.2, "Procedure for Reporting Variations from Normal Plant Operations, Defects and Non-Compliance" to assure that special reporting requirements are better controlled.
4. The Equipment Status Log index has been revised to more clearly indicate TS requirements.

8809130312 880909
 PDR ADCK 05000410
 PDC

IER2
11



LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Nine Mile Point Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 410	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		88	041	00	02	OF 05

TEXT (If more space is required, use additional NRC Form 366A's) (17)

I. DESCRIPTION OF EVENT

On August 11, 1988 at 1500 hours with the reactor mode switch in RUN (Operational Condition 1) and at a power level of approximately 100% of thermal capacity, the Chemistry Department discovered that Nine Mile Point Unit 2 (NMP2) had not been in compliance with Technical Specification (TS) section 3.3.7.9b since March 1, 1988. Specifically, the Liquid Radwaste Effluent Radiation Monitor (2LWS-RE206) was inoperable for greater than 30 days (November 2, 1987 to February 3, 1988) and was not reported in the Semi-Annual Radiological Effluent Release Report (SARERR) as required by Technical Specifications.

The sequence of events for this incident are as follows:

On November 2, 1987, 2LWS-RE206 was determined to be inoperable due to the detection chamber high radiation background. Additionally, Occurrence Report (OR) #87-226 was written and 2LWS-RE206 was entered into the Equipment Status Log (Index #87-1442). Action 128 of TS Section 3.3.7.9 was initiated.

On March 1, 1988, the SARERR was submitted for the latter half of 1987 without the inoperability of 2LWS-RE206 being reported.

At approximately 0900 hours on August 11, 1988, a generation engineer in the NMP2 Chemistry Department was asked to check a list of instrumentation entered in the Equipment Status Log (ESL) during the latter half of 1987. This was to determine if these entries had explanations of their inoperability in the SARERR. This was a commitment from LER 88-27. Upon review, the engineer discovered that the entry for 2LWS-RE206 was not entered on the SARERR. The SSS was then informed and OR 88-124 was written. The 10CFR50.36 notification requirements were then completed.

There were no other components or systems that were inoperable which contributed to this event.

II. CAUSE OF EVENT

The root cause of this event is personnel error. The ESL, which is handled by the Operations Department, had an incomplete entry in the index. In addition, both the Operations and Technical Support Departments did not identify that 2LWS-RE206 was required to be included in the SARERR if inoperable for more than 30 days when reviewing OR 87-226. There was an inadequate review of information by the Chemistry Unit Supervisor when preparing the SARERR.

A contributing factor for the inadequate review of OR 87-226 was that AP-10.2.2, "Procedure for Reporting Variations from Normal Plant Operations, Defects and Non-Compliance" does not provide direction for tracking events that become reportable after a time period from the initiating event.



LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Nine Mile Point Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 410 88	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		88	041	00	03	OF 05

TEXT (If more space is required, use additional NRC Form 388A's) (17)

A statement was included about the 30 day reportability requirement for the SARERR when 2LWS-RE206 was entered into the ESL. The ESL has an index in which the Operations staff uses for checking the status of plant equipment and TS requirements while the equipment is out of service. Investigation of the ESL index #87-1442 revealed the 30 day reporting requirement statement was not transferred to the index. Thus, the Operations Department did not trigger the 30 day reportability.

When OR #87-266 was written and submitted to the SSS for review and reportability assessment, special TS reportability requirements for the SARERR were not identified either by the Chemistry or Operations Departments. In the subsequent reviews by Technical Support and the Station Superintendent, this TS reportability (after 30 days of inoperability) was not identified.

The Chemistry Unit Supervisor who prepared the SARERR was aware that 2LWS-RE206 was inoperable for more than 30 days and that an explanation of this inoperability was required. However, approximately two months later, while preparing the SARERR, the chemistry supervisor did not adequately review the data for the SARERR.

AP-10.2.2 does not specify the tracking of events that may become reportable after a specified time period of inoperability of equipment. Thus the reviewers could not have given notification that the inoperability of 2LWS-RE206 was reportable at the time they reviewed it since the 30 days had not passed.

III. ANALYSIS OF EVENT

This event is considered reportable via 10CFR50.73(a)(2)(i)(B) because of the failure to include an explanation of the inoperability of 2LWS-RE206 in the SARERR is a non-compliance with TS section 3.3.7.9b.

Action 128 of TS 3.3.7.9 was taken which verified that releases were below allowable limits; (i.e., two independent samples taken and analyzed in accordance with TS 4.11.1.1.1 and two people verifying the release rate calculations and discharge line valving). Therefore, there was no impact on public safety.

The explanation of the inoperability of 2LWS-RE206 was included in the SARERR for the first half of 1988 which was submitted on August 30, 1988. This action brings NMP2 back into compliance with TS Section 3.3.7.9b. Therefore, the duration of the event from March 1, 1988 to August 30, 1988 is 183 days.



LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Nine Mile Point Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 410	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		88	041	00	04	OF 05

TEXT (If more space is required, use additional NRC Form 366A's) (17)

IV. CORRECTIVE ACTIONS

The explanation of the inoperability of 2LWS-RE206 was included in the SARERR submitted for the first half of 1988.

The ESL has been changed since the start of the event to more clearly indicate TS requirements in the index.

A Lessons Learned Transmittal (LLT) will be sent to the Operations Department to amend the LLT from LER 88-27 to include all TS reportability requirements on Occurrence Reports including Routine Reports described in TS Section 6.9.

An LLT will be sent to the Technical Support Department explaining that their review for TS reportability requirements shall include all TS required reports including those required to be reported on Routine Reports as specified in TS Section 6.9.

An LLT will be sent to the Chemistry Department to point out the instrumentation that is required for inoperability reporting on the SARERR. It will also point out the necessity of checking with the appropriate tracking department for inoperability information and confirming with other sources.

AP-10.2.2, "Procedure for Reporting Variations from Normal Plant Operations, Defects and Non-Compliance", will be revised to require special reporting requirements be documented on the OR including those that become applicable after a specified time period and to clearly identify responsibilities for the various reports.

V. ADDITIONAL INFORMATION

A. Identification of Components Referred to in this LER

Component	IEEE 803 EIIIS Funct	IEEE 805 System ID
Radiation Monitor	MON	WD

B. Failed Components - None

C. Previous Events

LER 88-27 discussed a missed special report due to personnel error. Specifically an incomplete entry on the ESL index gave no direction to Operations personnel that an OR needed to be written. The event described in this LER resulted from an investigation initiated by LER 88-27. This event, though related, is not similar.



LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Nine Mile Point Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 410	LER NUMBER (8)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		88	041	00	05	05 OF

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

LER 88-03 discussed a missed special report due to a programmatic deficiency. In this case, the people reviewing and determining the reportability requirements of an OR failed to identify the need for a special report per Technical Specifications. Part of the corrective actions for LER 88-03 included a re-review of occurrence reports to determine if other Special Reports were missed. While this activity had the potential to discover the error described in this LER, it was not the objective of that review and did not identify it.

D. Explanation of Inoperability of 2LWS-RE206 - The background radiation of the monitor is very high. The detection chamber acts as a crud trap for contamination. NMP2 is currently working on a modification (#88-011) on that monitor.



September 9, 1988

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

RE: Docket No. 50-410
LER 88-41

Gentlemen:


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

LER 88-41 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 10CFR50.36 report was made at approximately 1530 hours on
August 11, 1988.

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/BB/mjd

Attachments

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

JE22
1/1

