

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8812090314 DOC. DATE: 88/12/02 NOTARIZED: NO DOCKET #
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moho 05000410
 AUTH. NAME AUTHOR AFFILIATION
 BURKHARDT, L. Niagara Mohawk Power Corp. . .
 RECIPIENT AFFILIATION
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Rept 50-410/88-18.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT		COPIES			RECIPIENT		COPIES		
	ID CODE/NAME		LTR	ENCL		ID CODE/NAME		LTR	ENCL	
	PD1-1 PD		1	1		HAUGHEY, M		1	1	
	BENEDICT, R		1	1						
INTERNAL:	ACRS		2	2		AEOD		1	1	
	DEDRO		1	1		NRR MORISSEAU, D		1	1	
	NRR/DLPQ/PEB 11		1	1		NRR/DLPQ/QAB 10		1	1	
	NRR/DOEA DIR 11		1	1		NRR/DREP/EPB 10		1	1	
	NRR/DREP/RPB 10		2	2		NRR/DRIS DIR 9A		1	1	
	NRR/PMAS/ILRB12		1	1		NUDOCS-ABSTRACT		1	1	
	OE-LIEBERMAN, J		1	1		OGC/HDS1		1	1	
	REG FILE 02		1	1		RGN1 FILE 01		1	1	
INTERNAL:	LPDR		1	1		NRC PDR		1	1	
	NSIC		1	1		RESL MARTIN, D		1	1	

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 25 ENCL 25

R
I
D
S
/
A
D
D
S

R
I
D
S
/
A
D
D
S



December 2, 1988
NMP2L 1183

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Re: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Gentlemen:

Attached is Niagara Mohawk's response to the Notice of Violation contained in Inspection Report No. 50-220/88-18 and 50-410/88-18.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



L. Burkhardt, III
Executive Vice President
Nuclear Operations

DAC/pns
6253G
Attachment

xc: Regional Administrator, Region I
Mr. R. A. Capra, Director
Ms. M. F. Haughey, Project Manager
Mr. W. A. Cook, Resident Inspector
Records Management

TEO1
11



Niagara Mohawk Power Corporation
Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Response to Notice of Violation
Contained in Inspection Report No. 50-220/88-18 and 50-410/88-18

Violation

Nine Mile Point Unit 2 Technical Specification 6.8 requires that the licensee implement procedures for surveillance and testing of safety-related equipment.

Surveillance Procedure N2-ISP-RMC-@101, RBM Flow Biased Trip Point Adjustment for Single Loop Operation, requires in step 9.1 that a sign off be made to the effect that all "As-Left" data obtained and recorded in step 8.2.23 meet the criteria stated on the checklist/data sheet for that step. Also, step 6.1 of this procedure requires that the Senior Shift Supervisor (SSS) and the I&C Supervisor be informed if any step in the procedure cannot be completed as stated.

Contrary to the above, on September 15, 1988, an I&C technician signed off step 9.1 of the procedure; however, the "As-Left" trip settings for the Rod Block Backup Trip (channels A and B) were not obtained and not recorded in step 8.2.23 due to a procedural deficiency. Furthermore, contrary to the requirements of step 6.1, neither the SSS nor the I&C Supervisor were informed that the procedure could not be completed as written.

This is a Severity Level V Violation (Supplement 1).

Response

Niagara Mohawk admits to the violation as stated.

The primary cause for this event was personnel error in that the technicians performing Surveillance Procedure N2-ISP-RMC-@101 did not stop the procedure when they could not perform the procedure as written and did not notify the SSS and I&C Supervisor as required per step 6.1 of the procedure.

A contributing cause of this event was a procedural deficiency in that the procedural steps were not in the correct sequential order.

The immediate corrective action was the issuance of a Temporary Change Notice (TCN) to Procedure N2-ISP-RMC-@101. This temporary change will be incorporated into the procedure. This TCN placed the recording of the required data in the proper sequence. The procedure was reperformed the day after the discrepancy was noted, and the Rod Block Backup Trip point value was verified correct and recorded as required.



The long-term corrective action consisted of a series of meetings with I&C technicians to emphasize the Niagara Mohawk policy regarding procedural compliance. Additionally, a Lessons Learned Transmittal has been issued to appropriate departments which also discusses procedural compliance.

Niagara Mohawk was in full compliance regarding the surveillance requirement on September 16, 1988.

Violation

10 CFR 50, Appendix B, Criterion XVI and Niagara Mohawk Power Corporation Quality Assurance Program Topical Report for Nine Mile Point Nuclear Station Operations, QATR-1, Revision 3, Section 16, require that conditions adverse to quality be promptly identified and that corrective action be implemented in a timely manner.

Contrary to the above, when on July 21, 1988, the station Quality Assurance organization initiated Corrective Action Request (CAR) 88-1017 identifying an incomplete list of snubbers required to be inspected per Unit 2 Technical Specification (TS) 4.7.5.b by July 29, 1988, licensee response to CAR 88-1017 and corrective actions were untimely and inadequate to preclude violating TS 4.7.5.b as determined on September 1, 1988.

This is a Severity Level IV Violation (Supplement I).

Response

Niagara Mohawk admits to the violation as stated.

The immediate cause for this event was the lack of a complete Snubber List which would have prevented violations of the required Technical Specification.

The root cause was a Niagara Mohawk management deficiency in that an appropriate Technical Specification Snubber List had not been provided. Further, Niagara Mohawk management failed to insure that proper controls were in place so that a controlled, accurate list was used in the Technical Specification inspection program.

The immediate corrective action consisted of developing and verifying a controlled list of Technical Specification Snubbers, and performing the required inspections on those snubbers which were missed or for which insufficient data was available to validate their previous inspections.

During the development of the Snubber List, the definition of applicable Technical Specification Snubbers was expanded to include non-safety related snubbers affecting safety-related systems. Included in the verification of the Snubber List was a review of both safety and non-safety related stress calculations.



The review resulted in an additional 148 snubbers being identified and added to the list. Of these 148 snubbers, 57 had been inspected previously. The remaining 91 snubbers required inspection. In addition, one additional snubber that was on the original Technical Specification list required reinspection due to missing data. The required inspections were performed and all snubbers were determined to be acceptable.

For the long-term corrective action, Niagara Mohawk will review both Unit 1 and Unit 2 Technical Specifications and other appropriate documents to determine where controlled lists are required or would provide the necessary controls to prevent reoccurrence of this or similar types of noncompliances.

Niagara Mohawk will be in full compliance when the controlled lists are complete. This is expected to be completed during the first quarter of 1989.

