ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8904210058 DOC.DATE: 89/04/05 NOTARIZED: NO DOCKET #
FACIL:50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
AUTH.NAME AUTHOR AFFILIATION
PASTERNAK,R.J. Niagara Mohawk Power Corp.
BURKHARDT,L. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-008-00:on 890302,incomplete Tech Spec surveillance due to programmatic deficiency.

W/8 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 5
TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD1-1 LA	1	1	PD1-1 PD	1	1
	SLOSSON,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/TPAB	1	1	AEOD/ROAB/DSP	2	2
	DEDRO	1	1	IRM/DCTS/DAB	1	1
	NRR/DEST/ADE 8H	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/RPB 10	2	2
	NRR/DRIS/SIB 9A	1	1	NUDOCS-ABSTRACT	1	1
	REG FILE 02	1	1	RES/DSIR/EIB	1	1
	RES/DSR/PRAB	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 MAYS,G	1	1
	NSIC MURPHY,G.A	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: LTTR 45 ENCL 44

R I D S / A D D S

R I D S / A D D S

A104

NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Nine Mile Point Unit 2	0 5 0 0 0 4 1 0	1 OF 0 4

TITLE (4)

Incomplete Technical Specification Surveillance Due to a Programmatic Deficiency

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)
										0 5 0 0 0
0 3	0 2	8 9	8 9	— 0 0 8	— 0 0	0 4	0 5	8 9		0 5 0 0 0

OPERATING MODE (9)	4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	0 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
Raymond J. Pasternak, Manager, Site Engineering	3 1 5 3 4 9 - 4 5 6 6

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)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

ABSTRACT

On March 2, 1989 during an Engineering review of the Nine Mile Point Unit 2 (NMP2) Final Safety Analysis Report (FSAR), it was discovered that an electrical circuit for suppression chamber 120 VAC receptacles was incorrectly identified in the Unit's Technical Specifications which resulted in an incomplete surveillance. At the time of the discovery, NMP2 was in Cold Shutdown with all control rods inserted.

The root cause of this event has been determined to be a programmatic deficiency. A Technical Specification source document was changed subsequent to the draft Technical Specification verification effort being completed, and prior to the 10CFR50.59 program being fully implemented.

The remainder of the Technical Specification Table for Primary Containment AC Circuits was verified to be accurate. Also, the Operations Department daily checks surveillance procedure N2-OSP-LOG-D001 was revised to include this circuit.

A verification to ensure that no additional design changes impacting Technical Specifications will be completed. Additionally, Technical Specification Table 3.8.4.1-1 will be revised.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Nine Mile Point Unit 2	0 5 0 0 0 4 1 0	8 9	— 0 0 8	— 0 0	0 2 OF 0 4

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

I. DESCRIPTION OF THE EVENT

On March 2, 1989, during an Engineering review of the Nine Mile Point Unit 2 (NMP2) Final Safety Analysis Report (FSAR), it was discovered that a 120 VAC electrical circuit for suppression chamber receptacles was incorrectly identified in the primary containment AC circuits Technical Specification Table 3.8.4.1-1 which resulted in an incomplete Technical Specification surveillance. At the time of the discovery, NMP2 was in Cold Shutdown, with all control rods inserted.

During the construction phase of NMP2, the 120 VAC circuit which supplies receptacles inside the suppression chamber was changed from 2LAR-PNLN03-CKT #7 to 2LAR-PNLU01-CKT #8 (2LAR-PNLN03-CKT #7 was spared). This change was made by the NMP2 Architect-Engineer. However, when the Technical Specification Table 3.8.4.1-1 was developed, the circuit change was omitted. Subsequently, Technical Specification surveillance procedures were developed based on this information. As a result, the incorrect circuit was included in the Daily Operations Department Surveillance Procedure, N2-OSP-LOG-D001, which is used to satisfy Technical Specification 3.8.4.1. Therefore, the incorrect circuit was verified to be de-energized since the issuance of the NMP2 operating license.

Technical Specification 3.8.4.1 addresses AC circuits inside the primary containment (Table 3.8.4.1-1). Technical Specification Surveillance Requirement 4.8.4.1 requires that all primary containment AC circuits be determined to be de-energized at least once per 24 hours in mode 1, 2 or 3 by verifying that the associated circuit breakers are in a tripped condition. This action has been carried out on a daily basis via procedure N2-OSP-LOG-D001 with the exception of 2LAR-PNLU01 CKT #8.

II. CAUSE OF THE EVENT

The root cause of this event was a programmatic deficiency in the way that design changes were controlled during the development of the Technical Specifications.

This programmatic deficiency allowed a non-safety related design change to be made to a primary containment AC receptacle circuit without the change being incorporated into the draft Technical Specification.

This occurred as a result of a design change process which did not require a formal review against the draft Technical Specification. At that time, no process existed similar to that required by 10CFR50.59 which would have identified this condition. Only during an eight month period between the draft Technical Specification verification effort, and the implementation of the 10CFR50.59 review process did this condition exist.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Nine Mile Point Unit 2	0 5 0 0 0 4 1 0	8 9	— 0 0 8	— 0 0	0 3 OF 0 4

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

III. ANALYSIS OF THE EVENT

This event is reportable under the requirement of 10CFR50.73(a)(2)(i)(B) which requires the licensee to report, "Any operation or condition prohibited by the plants' Technical Specifications".

During the periods in which primary containment was required, from the time of initial operation until the last unit shutdown on October 1, 1988, primary containment penetration #Z60E was not protected from electrical faults in a manner consistent with Technical Specifications.

Primary containment electrical penetrations and penetration conductors are required to be protected by either de-energizing circuits which are not required during reactor operation or by demonstrating the operability of primary and backup circuit overcurrent interrupting devices.

The circuit identified (2LAR-PNLU01 CKT #8), while not verified to be de-energized during this period, was protected by primary and backup circuit overcurrent interrupting devices. This determination is based on a preliminary calculation which was performed as a result of this condition. This calculation concludes that the circuit design provides primary and backup circuit overcurrent interrupting devices which would have interrupted the circuit prior to reaching the penetration design capacity. Therefore, based on this information, there was no potential for violation of the primary containment, thus posing no threat to plant personnel or the health and safety of the general public.

IV. CORRECTIVE ACTIONS

The following corrective actions were or will be taken as a result of this condition:

1. The remainder of Technical Specification Table 3.8.4.1-1 was verified to be accurate.

2. Operations daily checks procedure N2-OSP-LOG-D001 was revised to include the missing circuit (2LAR-PNLU01 CKT #8).

3. The preparation of the current FSAR update submittal will verify that identified FSAR revisions resulting from design changes are accurately reflected in the Technical Specifications. Design changes which were initiated during the eight month period that did not affect the FSAR will also be reviewed for potential Technical Specification impact.

4. The Technical Specification Table 3.8.4.1-1 will be revised.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Nine Mile Point Unit 2	0 5 0 0 0 4 1 0	8 9	— 0 0 8	— 0 0	0 4 OF 0 4

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

V. ADDITIONAL INFORMATION

A. Identification of Components

	IEEE-803 E11S Funct	IEEE-805 System ID
Suppression Chamber	NA	NH
Primary Containment	NA	NH
Receptacles	N/A	N/A
Breakers	BKR	EC
Penetrations	PEN	NH

B. Failed Components

None.

C. Previous Similar Events

There have been no previous events which have been a result of not incorporating engineering change documentation into Technical Specifications which resulted in inaccurate surveillance activities.

NIAGARA MOHAWK

NMP46296

NINE MILE POINT NUCLEAR STATION / P.O. BOX 32 LYCOMING, NEW YORK 13093 / TELEPHONE (315) 343-2110

April 5, 1989

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

RE: Docket No. 50-410
LER 89-08

Gentlemen:

In accordance with 10CFR50.73, we hereby submit the following Licensee Event Report:

LER 89-08 Is being submitted in accordance with 10CFR50.73(a)(2)(i)(B) "Any operation or condition prohibited by the plant's Technical Specifications."

Very truly yours,

L. Burkhardt, III
Executive Vice President
Nuclear Operations

JLW:GM:mjv
(0408V)

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

Cert No P137405089

IE22
1/1