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SUBJECT: Forwards proposed resolutions for unresolved items in
 Requalification Program Evaluation Rept 50-220/90-19.

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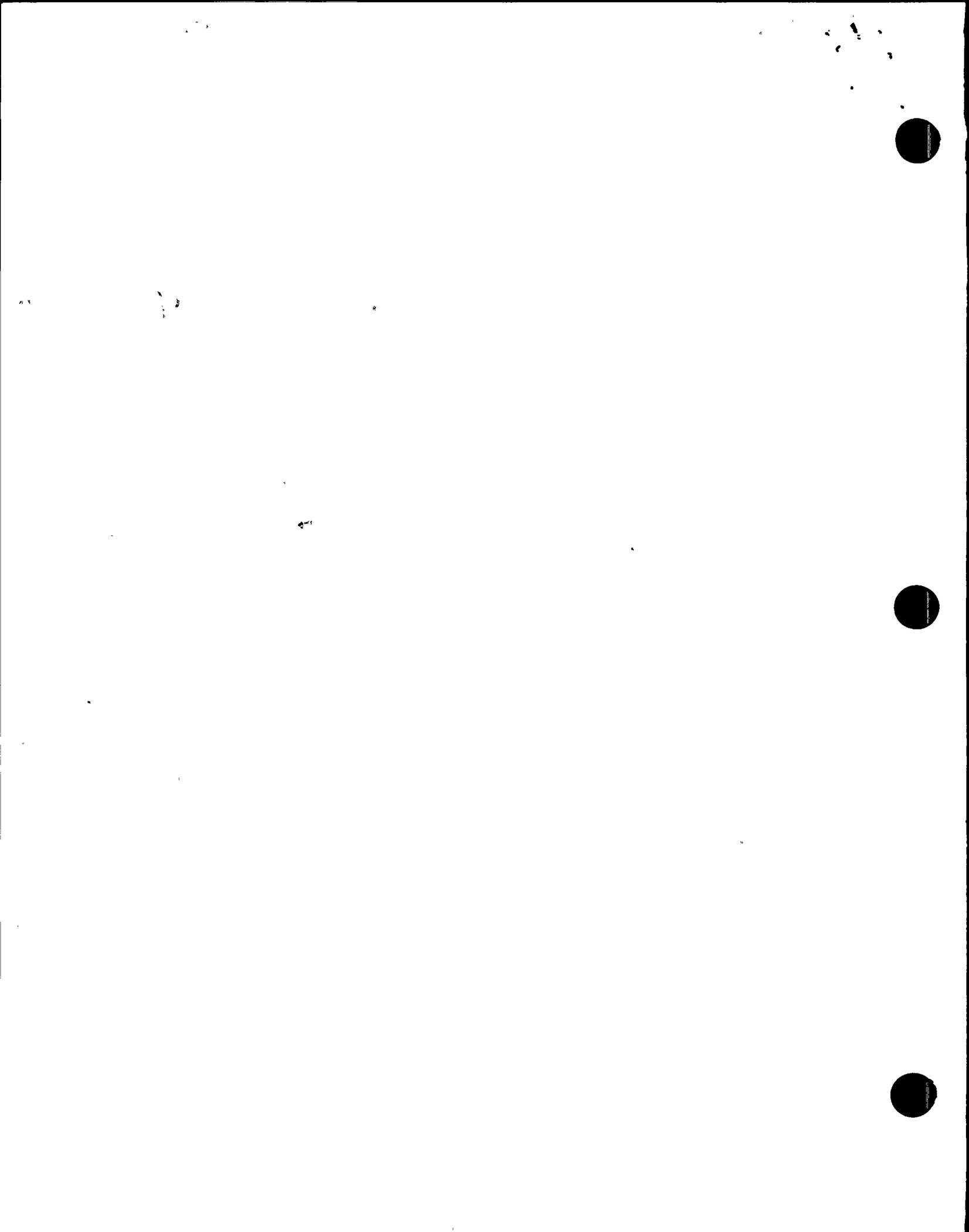
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October 4, 1990

NMP1L 0529

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

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Gentlemen:

During the weeks of July 9 and July 16, 1990, the NRC conducted a requalification program evaluation at Nine Mile Point Unit 1 (NMP1). The evaluation had two purposes: (1) to evaluate individual operator competency, and (2) to evaluate the effectiveness of the licensed operator training program.

On August 22, 1990, the NRC issued Requalification Program Evaluation Report No. 50-220/90-19. Report No. 50-220/90-19 indicated that, as a result of the evaluation, NMP1's program had been rated as satisfactory. However, the NRC identified three Unresolved items and requested that Niagara Mohawk submit proposed resolutions for each item. The attachment to this letter submits our proposed resolutions for the three Unresolved items.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



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ATTACHMENT

Unresolved Item 50-220/90-19-01

Unresolved Item 50-220/90-19-01 concerns the rotation of ROs. The examiners observed that, during simulator evaluations, the ROs did not rotate to a different position for subsequent scenarios such as the CSO position (Chief Shift Operator). Instead, they held the same position throughout the evaluation, from scenario to scenario. 10 CFR 55.59(a)(2)(ii) requires each operator to demonstrate an understanding of and the ability to accomplish a comprehensive sample of the items specified in 55.45 (a). However, if ROs do not rotate between positions and, consequently, are not exposed to the different panels where different systems are controlled, it is not apparent that they have met the comprehensive sample as described in 10 CFR 50.59.(a)(2)(ii). Verification that operators receive a comprehensive sample of required items during the annual operating tests is considered unresolved pending further NRC review.

Response

10 CFR 55.59 (a)(2)(ii) requires each operator to demonstrate an understanding of and the ability to accomplish a comprehensive sample of the items specified in 55.45 (a), "Operating Tests-Content." To satisfy this requirement, Nine Mile Point Unit 1's (NMP1) 10 CFR 55 Annual and Biennial Operating Examinations will require the three shift Reactor Operators (ROs) to be rotated through two of the three RO positions. Each RO position allows an operator to perform up to eight of the twelve items delineated in Section 55.45a.

Niagara Mohawk believes the proposed rotation of NMP1 ROs during 10 CFR 55 operating examinations will satisfy the requirements of 10 CFR 55.59 (a)(2)(ii). The RO rotation through two of the three RO positions and the ability to perform up to eight of the twelve items specified in 55.45 (a) at each position constitutes a "comprehensive sample" of these items.

Unresolved Item 5022-/90-19-02

Unresolved Item 50-220/90-19-02 concerns classifying every failure of rods to insert as an Alert or higher class of emergency. During the simulator evaluations, the operators automatically declared an Alert for conditions when most rods had scrambled and power was in the intermediate range or below. Based on discussions the examiners had with the Operations Superintendent, it appears that an Alert is declared primarily because it is a simple and quick method to muster additional facility personnel to assist the control room operators in handling any trouble-shooting efforts. However, by declaring an Alert, local, state, and federal agencies are notified, who in



turn usually dispatch their representatives to respond to the Alert condition. These authorities would be mobilized for situations that do not genuinely require assistance from outside NMP1. The declaration of an Alert or higher for any failure of rods to insert is considered unresolved pending further NRC review.

Response

NMP1's procedure for classifying emergency conditions S-EAP-2, "Classification of Emergency Conditions," was revised subsequent to the inspection period. Revision 12 of S-EAP-2 became effective on September 1, 1990, and included classifications for an Anticipated Transient Without Scram (ATWS) event as an Unusual Event, Alert, Site Area Emergency, and General Area Emergency in accordance with the guidelines of NUREG-0654, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." Revision 12 provides sufficient guidance in classifying failure to initiate a SCRAM and failure to complete a SCRAM events which should preclude the notification of outside agencies unnecessarily.

Unresolved Item 50-220/90-19-03

Unresolved Item 50-220/90-19-03 concerns installing jumpers in order to bypass a Main Steam Isolation Valve (MSIV) closure. Specifically, EOP-8, "Emergency RPV Depressurization," step 2.4 directs bypassing, "... any low-low RPV water level MSIV isolation..." by installing four jumpers. During the simulator portion of the exam, two crews performed this step differently, even though each crew was dealing with very similar plant conditions. One crew installed the jumpers even though water level was several feet above the low-low isolation setpoint. A second crew deliberately chose not to install the jumpers precisely because water level was several feet above the isolation setpoint. Consequently, there was an inconsistent execution of step 2.4 between the two crews. Additionally, based on discussions with operations personnel, there appears to be an inconsistent interpretation of what the words in step 2.4 mean. That is, do the operators install the jumpers, regardless of water level (high or low), or do they install the jumpers only when the low-low level condition actually exists.

Response

Emergency Operating Procedure (EOP-8) Step 2.4 (also EOP-3, Step 6.4.4) requires that the low-low RPV water level MSIV isolation signal be bypassed only when the condition is present. The inconsistent execution of EOP Step 2.4 was due to insufficient operator guidance. To preclude future misinterpretations, operator training on Step 2.4 will be conducted during NMP1 normal requalification program. This training will ensure operators are aware Step 2.4 is to be performed only when the low-low water level condition is present. In addition, the

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Operations Department Instruction (ODI-1.08) which provides guidance in implementing the EOPs has been revised to clarify Step 2.4.

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