

DCS

SEP 22 1992

Docket No. 50-220

Mr. B. Ralph Sylvia
Executive Vice President - Nuclear
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13212

Dear Mr. Sylvia:

Subject: Inspection Report No. 50-220/92-82

This refers to your letter dated August 19, 1992, in response to our letter dated July 30, 1992.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

(Faint signature)
Jacques P. Durr

Jacque P. Durr, Chief
Engineering Branch
Division of Reactor Safety

9209290047 920922
PDR ADOCK 05000220
Q PDR

11
7E'01



SEP 22 1992

B. Ralph Sylvia

2

cc w/encl:

J. Firlit, Vice President - Nuclear Support
C. Terry, Vice President - Nuclear Engineering
J. Perry, Vice President - Quality Assurance
Vice President - Nuclear Generation
K. Dahlberg, Unit 1 Plant Manager
M. McCormick, Unit 2 Plant Manager
D. Greene, Manager, Licensing
J. Warden, New York Consumer Protection Branch
G. Wilson, Senior Attorney
M. Wetterhahn, Winston and Strawn
Director, Power Division, Department of Public Service, State of New York
C. Donaldson, Esquire, Assistant Attorney General, New York Department of Law
K. Abraham, PAO (30) SALP Reports and (2) All Inspection Reports
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New York, SLO Designee

bcc w/encl:

Region I Docket Room (with concurrences)
C. Cowgill, DRP
J. Yerokun, DRP
L. Nicholson, DRP
S. Greenlee, DRP
W. Schmidt, SRI - Nine Mile
R. Lobel, OEDO
R. Capra, NRR
J. Menning, NRR
D. Brinkman, NRR
DRS/EB SALP Coordinator
D. Holody, EO

RI:DRS

Trapp

JAT
08/31/92


RI:DRS

Durr

922
08/31/92

OFFICIAL RECORD COPY

A:RL9282



B. Ralph Sylvia
Executive Vice President
Nuclear

August 19, 1992
NMP87236

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

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

Gentlemen:

**SUBJECT: "REPLY TO A NOTICE OF VIOLATION," AS CONTAINED IN NRC
COMBINED INSPECTION REPORT NOS. 50-220/92-82 AND 50-410/92-82**

Attached is Niagara Mohawk Power Corporation's response to the Notice of Violation contained in the subject Inspection Report dated July 20, 1992. We believe that the corrective actions described in this response have appropriately addressed the cause of this violation and will prevent recurrence. If you have any questions concerning this matter, please contact me.

Very truly yours,



B. Ralph Sylvia
Exec. Vice President - Nuclear

BRS/AZP/lmc

Attachment

xc: Mr. T. T. Martin, Regional Administrator, Region I
Mr. W. L. Schmidt, Senior Resident Inspector
Mr. R. A. Capra, Director, NRR
Mr. D. S. Brinkman, Senior Project Manager, NRR
Mr. L. E. Nicholson, Chief, Reactor Projects, Section 1B
Records Management



NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 1

DOCKET NO. 50-220

DPR-63

"REPLY TO A NOTICE OF VIOLATION," AS CONTAINED IN INSPECTION REPORT 50-220/92-82 AND 50-410/92-82

VIOLATION 50-220/92-82-01

As a result of an inspection conducted on June 22 - 26, 1992, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C (Enforcement Policy), the following violation was identified:

Technical Specifications, Section 6.8.1, states in part that "written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USAEC Regulatory Guide 1.33..."

ANSI 18.7-1972, Section 5.3.1, states in part that "each procedure shall be sufficiently detailed for a qualified individual to perform the required function without direct supervision..."

Contrary to the above, on June 24, 1992, it was determined that preventive maintenance procedures N1-EMP-GEN-R120 (ac valves) and N1-EMP-GEN-R121 (dc valves) did not provide sufficient detail for a qualified individual to perform steps 7.5.3., which verified MOV torque switch dial settings.

1. REASON FOR THE VIOLATION

Niagara Mohawk admits to the violation as written in Inspection Report, 92-82. A root cause evaluation was performed which attributed the violation to personnel errors. These errors resulted in less than adequate control of Motor Operated Valve (MOV) torque switch dial settings at Unit 1. The errors identified are as follows:

- (1) Procedures for controlling MOV torque switch dial settings provided insufficient direction as to the specific information to be recorded by the craftsmen. Further, the procedures did not adequately identify where the correct torque switch dial settings are found on the controlling document.
- (2) Prior to the event, Preventive Maintenance Procedures N1-EMP-GEN-R120 and R121 were revised to require recording actual torque switch dial settings. Previously, the requirement was to record recommended and maximum torque switch settings from the MOV label. This change was not effectively



communicated to the craftsmen and their supervisors, nor was training effective in relating the procedural step change.

- (3) Training did not emphasize the importance of maintaining torque switch dial settings consistent with controlled engineering drawings. Further the significance of maintaining torque switch dial settings was confused by previous testing to obtain thrust values utilizing the Motor Operated Valve Analysis Test System (MOVATS).

2. THE CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A Deviation Event Report (DER) was initiated as soon as the violation was identified during the inspection on June 24, 1992. As part of the DER process a Root Cause Analysis was performed. Concurrent with the Root Cause Analysis, these immediate corrective actions were initiated:

- An immediate Procedure Change Evaluation (PCE) was issued to clarify and improve the level of detail in Maintenance Procedures N1-EMP-GEN-R120 and R121.
- An engineering review and maintenance field walkdown of valves in the Generic Letter 89-10 program were initiated, which verified the valves to be operable.
- All affected craftsmen and their supervisors were re-trained within 24 hours. The training stressed the significance of maintaining the correct torque switch dial settings, the procedure inadequacies, and how the procedure had been changed. This training also stressed the correct control document for torque switch settings is drawing #E21.6 F-42124-C.

3. THE CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

- The Electrical Maintenance Procedures N1-EMP-GEN-R120 and R121, which were the primary cause of this violation, have been revised.
- The root cause analysis identified an ambiguity in step 7.5.3 of the above procedures, in that the control drawing referenced (#E21.6 F-42124-C) states "RECOMMENDED TORQUE SWITCH SETTINGS." This statement caused confusion among the craftsmen when performing the procedure, (it was not clear to them what the torque switch requirements were). Therefore, a revision to drawing #E21.6 F-42124-C will be issued to clarify the ambiguity. This will assure configuration control of torque switch dial settings by clearly stating on the drawing what the correct settings are when performing step 7.5.3.
- As a final step to prevent recurrence, training lesson plans will be revised to address the basis and methods of torque switch dial settings and the importance of maintaining torque switch dial settings.



4. THE DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on July 16, 1992 with completion of the following actions:

- Issuing PCEs #23694 and #23693 to Maintenance Procedures N1-EMP-GEN-R120 and R121 on June 26, 1992.
- On July 16, 1992, prior to startup of the unit, all discrepancies identified by walkdowns or reviews were resolved and all valves in the GL 89-10 Program Plan were determined to be operable.

