

APPENDIX A

Notice of Violation

Niagara Mohawk Power Corporation
Nine Mile Point Unit 1

Docket Nos. 50-220
License Nos. DPR-63

During an NRC inspection conducted on September 27 - October 31, 1992, two examples of a violation of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 50 Part 2, Appendix C (1992), the violation is listed below:

Nine Mile Point Unit 1 Technical Specification 6.8.1 states that written procedures shall be implemented that meet or exceed the requirements and recommendations of Reg Guide 1.33, which requires that administrative procedures be implemented for procedure review and use. Niagara Mohawk Power Corporation (NMPC) Nuclear Division Directive (NDD)-PRO-01 requires: 1) that surveillance procedures include statements of plant impact to include expected annunciators and alarms; and 2) that following the receipt of unexpected responses that procedures be stopped and the reasons for the alarms be evaluated.

Contrary to the above, on October 26, 1992: 1) reactor water level instrument trip testing per procedure N1-ISP-036-003 did not include a statement of plant impact for a valid low water level scram signal; and 2) following the receipt of an unexpected half reactor scram signal during the performance of N1-ISP-036-003, attachment one, the procedure was not stopped and the reason for the alarm was not evaluated. Specifically, the plant impact statement for this procedure did not specify that a low water level half-scram condition would occur during the performance of the test. Further, the plant impact statement incorrectly specified that a "turbine trip half-scram signal" and a "feedwater pump high level trip half-scram signal" would be received, however, these are not valid reactor scram features. Following the receipt of the initial unexpected half-scram, the procedure was continued. The subsequent performance of attachments two and three also caused half-scram conditions, without the full understanding of all shift operating personnel and without their complete knowledge of all expected test results.

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

Pursuant to the provisions of 10 CFR 2.201, Niagara Mohawk Power Company is hereby required to submit to this office within thirty days receipt of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which will be taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

