



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO SALEM ATWS EVENT, GENERIC LETTER 83-28, ITEMS 3.1.3 AND 3.2.3

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT NUCLEAR STATION, UNIT 1

DOCKET NO. 50-220

1.0 INTRODUCTION

By letter dated November 8, 1983, Niagara Mohawk Power Corporation (NMPC, the licensee) submitted a response to Generic Letter 83-28 for the Nine Mile Point Nuclear Station, Unit 1 (NMP-1). This review covered Items 3.1.3 and 3.2.3.

2.0 BACKGROUND

On February 25, 1983, both of the scram circuit breakers at Unit 1 of the Salem Nuclear Power Plant failed to open upon an automatic reactor trip signal from the Reactor Protection System. This incident occurred during the plant startup and the reactor was tripped manually by the operator about 30 seconds after the initiation of the automatic trip signal. The failure of the circuit breakers has been determined to be related to the sticking of the undervoltage trip attachment. Prior to this incident, on February 22, 1983, at Unit 1 of the Salem Nuclear Power Plant, an automatic trip signal was generated based on steam generator low-low level during plant startup. In this case, the reactor was tripped manually by the operator almost coincidentally with the automatic trip. Following these incidents, on February 28, 1983, the NRC Executive Director for Operators (EDO), directed the staff to investigate and report on the generic implications of these occurrences at Unit 1 of the Salem Nuclear Power Plant. The results of the staff's inquiry into the generic implications of the Salem unit incidents are reported in NUREG-1000, "Generic Implications of ATWS Events at the Salem Nuclear Power Plant." As a result of this investigation, the Commission (NRC) requested (by Generic Letter 83-28 dated July 8, 1983) all licensees of operating reactors, applicants for an operating license, and holders of construction permits to respond to certain generic concerns. These concerns are categorized into four areas: (1) Post-Trip Review, (2) Equipment Classification and Vendor Interface, (3) Post-Maintenance Testing, and (4) Reactor Trip System Reliability Improvements.

Item 3.1.3 (Post-Maintenance Testing of Reactor Trip System (RTS) Components) requires licensees and applicants to identify, if applicable, any post-maintenance test requirements for the RTS in existing technical specifications which can be demonstrated to degrade rather than enhance safety. Item 3.2.3 extends this same requirement to include all other safety-related components. Any proposed technical specification changes resulting from this action shall receive a pre-implementation review by NRC.

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### 3.0 EVALUATION

Our review of the licensee's submittals was performed with the assistance of EG&G, Idaho, Inc. The submittal from NMPC was reviewed to determine compliance with Items 3.1.3 and 3.2.3 of the generic letter. First, the submittal was reviewed to determine if these two items were specifically addressed. Second, the submittal was checked to determine if there were any post-maintenance test requirements specified by the technical specifications that were suspected to degrade rather than enhance safety. Last, the submittal was reviewed for evidence of special conditions or other significant information relating to the two items of concern.

The review of Generic Letter 83-28, Item 4.5.3 may result in proposed changes to the technical specifications requirements for surveillance testing frequency and out-of-service intervals for testing. The primary concern of Item 4.5.3 is the surveillance testing intervals. Items 3.1.3 and 3.2.3 are specifically directed at post-maintenance test requirements. These concerns are essentially independent. However, the evaluation of these concerns are coordinated so that any correlation between these concerns will be adequately considered. Since no specific proposal to change the technical specifications has been submitted, there is no identifiable need at this time for correlating the reviews of Item 4.5.3 with this review.

The staff reviewed the licensee's November 8, 1983 submittal and requested additional information in a letter dated April 23, 1985. In a letter dated July 2, 1985, NMPC informed the staff that its evaluation of the NMP-1 technical specifications with respect to post-maintenance testing requirements which may degrade safety was not complete. In an earlier submittal (November 30, 1984) the licensee informed the staff of an ongoing internal program to improve technical specifications. Included in this program is an evaluation as to whether existing post-maintenance testing requirements may degrade safety. The licensee agreed to submit the results of this evaluation when finalized.

### 4.0 CONCLUSION

The licensee stated that review of the NMP-1 technical specifications regarding Items 3.1.3 and 3.2.3 of Generic Letter 83-28 is not complete. The licensee also stated that an internal program to upgrade the technical specifications is in process, and that the results of this program will be submitted when finalized. Based on our review, assisted by our contractor, EG&G, Idaho, Inc., the staff finds that the licensee's submittals, along with a commitment to submit technical specification changes regarding Items 3.1.3 and 3.2.3, if appropriate, is acceptable.

Principal Contributor: D. Lasher and M. Grotenhuis.

Dated: March 21, 1986.



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