

APPENDIX A

NOTICE OF VIOLATION

Niagara Mohawk Power Corporation
Nine Mile Point Unit 1

Docket No. 50-220
License No. DPR-63

Nine Mile Point Unit 1 Technical Specification 6.8.1 states that written procedures shall be established, implemented and maintained that meet or exceed the requirements of Section 5.3 of ANSI N18.7-1972 which states, in part, that written procedures, including revisions or changes, shall be reviewed for adequacy and approved by authorized personnel.

Contrary to the above, on May 7, 1990, Operating Procedure N1-OP-14, Containment Spray System Nos. 80 & 93, was revised to incorporate operational alternatives to 10 CFR 50, Appendix J, testing of the containment spray (CS) system discharge check valves in a manner which conflicted with existing procedures. Specifically, the revision to N1-OP-14:

1. Conflicted with the requirements of Emergency Operating Procedure (EOP) 4 regarding criteria for termination of containment spray;
2. Failed to identify that portions of Section H.8 of N1-OP-14 could not be performed, in that post-LOCA radiation fields would likely prohibit local operation of two of the CS system's cross-tie valves per EOP-10 (valves modified to manual operation only, per the Appendix J exemption Safety Evaluation 89-13); and,
3. Was written in a manner which created confusion among operators interviewed as to its applicability and implementation.

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 of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been 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.

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