

DCS

MAR 29 1991

Docket No. 50-410

Niagara Mohawk Power Corporation  
ATTN: Mr. B. R. Sylvia  
Executive Vice President  
Nuclear Operations  
301 Plainfield Road  
Syracuse, New York 13212  
Docket Nos. 50-410

Gentlemen:

SUBJECT: EMERGENCY OPERATING PROCEDURES INSPECTION AND INITIAL EXAMINATION  
- REPORT NO. 50-410/91-80

This refers to the special safety inspection conducted by an NRC Emergency Operating Procedure Inspection Team from January 28 to February 1, 1991, of activities at the Nine Mile Point Nuclear Station, Unit 2, to an initial licensing examination administered on January 31, 1991, and to the discussion of our findings with yourself and other members of your staff at the conclusion of the inspection.

The purposes of the inspection were to verify that the NMP2 Emergency Operating Procedures (EOPs) are technically correct, that the NMP2 EOPs can be physically carried out in the plant, and that the NMP2 EOPs can be implemented by the plant staff.

The enclosed report identifies areas examined during the inspection. The areas inspected included a comparison of the NMP2 EOPs with the BWR Owners Group (BWRONG) Emergency Procedure Guidelines (EPGs) and the plant specific NMP2 Emergency Procedure Guidelines, a review of the NMP2 EOPs by control room and plant walkdowns, an evaluation of the NMP2 EOPs on the plant reference simulator, a human factors analysis of the NMP2 EOPs, a review of the on-going evaluation program for EOPs, and a review of your quality assurance program involvement in the development and maintenance of the EOPs.

The inspection team concluded that the NMP2 EOPs are technically correct, can be physically carried out in the plant, and can be implemented by the plant staff. The operators' understanding of the EOP bases and ability to use the EOPs were considered a strength. There were some technical and human factors problems identified, mostly within the EOP support procedures. The majority of the problems appear to be the result of weaknesses within the verification and validation (V&V) process for the EOP support procedures. We request that you respond, in writing, within thirty days of receipt of this letter identifying the actions taken or planned to address: (1) the adequacy of the justification for not including main steam tunnel temperature as an entry condition

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to EOPs (Section 4.1); (2) the access restriction in the RWCU precoat filter room that could hinder implementation of emergency procedures for alternate boron injection (Section 5.0); (3) the weaknesses in the V&V program that resulted in deficiencies in the EOP support procedures (Sections 4.3, 5.0, and 7.1).

During this inspection, several previously unresolved items were closed. The most significant of these was confirmation of your completion of the corrective actions required to upgrade your licensed operator requalification program. This program was evaluated as unsatisfactory in July 1989 and returned to satisfactory status by letter from T. T. Martin dated November 15, 1990 following the 1990 NRC requalification examination and your certification of corrective action completion.

In addition, an initial examination was administered to a reactor operator license applicant who had previously failed the simulator portion of the initial examination. The applicant passed the reexamination.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the paperwork reduction act of 1980, Public Law No. 96-511.

Should you have any questions, please contact Mr. L. Bettenhausen, Chief, Operations Branch, at (215) 337-5291.

Sincerely,

**Original Signed By:**

Marvin W. Hodges, Director  
Division of Reactor Safety

Enclosure: Report No. 50-410/90-80



cc w/encl.:

M. Colomb, Manager, Operations-Unit 2  
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State of New York, SLO Designee



bcc w/encl.:  
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