

DCS

APR 18 1991

Docket No. 50-220

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

Subject: NRC Region I Inspection Report No. 50-220/91-02

Dear Mr. Sylvia:

This refers to your letter dated April 12, 1991 (NMP1L 0578), in response to our letter dated March 7, 1991.

Thank you for informing us of the corrective and preventive actions documented in your letter related to the implementation of a 10 CFR 50, Appendix J exception. These actions will be reviewed during a future inspection in the operations area.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

James C. Linville

James C. Linville, Chief

Reactor Projects Branch No. 1

Division of Reactor Projects

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cc:

J. Firlit, Vice President - Nuclear Generation
C. Terry, Vice President - Nuclear Engineering
J. Perry, Vice President - Quality Assurance
S. Wilczek, Jr., Vice President - Nuclear Support
K. Dahlberg, Unit 1 Plant Manager
M. McCormick, Unit 2 Plant Manager
D. Greene, Manager, Quality Assurance Operations - Unit 1
C. Beckham, Manager, Quality Assurance Operations - Unit 2
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Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New York, SLO Designee

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bcc:

Region I Docket Room (with concurrences)

J. Joyner, DRSS

J. Linville, DRP

D. Vito, DRP

D. Haverkamp, DRP

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for WCook/mjd

4/17/91

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RE: DRP

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J Linville
RE: DRP

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4/18/91

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Joseph F. Firlit
Vice President
Nuclear Generation

April 12, 1991
NMP1L 0578

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555


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

Gentlemen:


Attached is Niagara Mohawk Power Corporation's response to the Notice of Violation contained in Inspection Report Numbers 50-220/91-02 and 50-410/91-02 dated March 7, 1991. If you have any questions concerning this matter, please call me.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION


J. F. Firlit
Vice President - Nuclear Generation

NAS/rp
000975KK

xc: Regional Administrator, Region I 
Mr. W. A. Cook, Senior Resident Inspector
Records Management



NINE MILE POINT UNIT 1
DOCKET NO. 50-220
DPR-63

RESPONSE TO NOTICE OF VIOLATION CONTAINED IN
INSPECTION REPORT NOS. 50-220/91-02 AND 50-410/91-02

VIOLATION

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.



ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

Niagara Mohawk Power Corporation admits to the cited violation.

THE REASON FOR THE VIOLATION:

Niagara Mohawk has determined that this violation occurred due to inadequate technical review. The root cause for this inadequate review was poor definition of the roles and responsibilities of the involved departments. Management overview of the Restart Action Plan focused on defining the Appendix J licensing requirements. The same emphasis was not applied to the technical review and implementation of these requirements.

The reviewers of Safety Evaluation No. 89-13, "Appendix J-Water Seal" (SE 89-13) failed to address adequately the impact of procedural and technical issues prior to its approval. As a result, this review failed to identify the inconsistencies between Operating Procedure N1-OP-14, "Containment Spray System" (OP-14), and Emergency Operating Procedures (EOPs). In addition, SE 89-13 did not evaluate the additional requirements of operation of valves 80-40 and 80-45 for mitigation or recovery from an accident.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Section H.7.0 of OP-14 has been revised to remove the conflict between N1-EOP-4 and OP-14 regarding implementation of the water seal during a Design Basis Loss of Coolant Accident (LOCA). Steps H.7.3 through H.7.8 which were added to provide a water seal during times without drywell spraying have been deleted. SE 89-13 was revised to clarify the implementation of a water seal when containment spray is in the spray mode during the Containment Design Basis LOCA. SE 89-13 was also revised to clarify that intertie valves 80-40 and 80-45 are not accessible following an accident and specified alternate actions are required if these valves must be closed. In this regard, Section H.8 of OP-14 has also been revised to allow Drywell Flooding if intertie valves 80-40 or 80-45 are inaccessible due to radiological conditions. The OP-14 revisions have been reviewed under the provisions of 10CFR50.59 and no unreviewed safety question exists.

Shift briefings were held to provide operators clear direction to enter a Limiting Condition of Operation for those activities requiring closure of a containment spray isolation valve and closing of one or both of the two normally open intertie valves. These shift briefings eliminated the confusion among operators regarding Limiting Condition of Operation for those activities described above.

On-shift training for all operating crews on the revised OP-14 will be complete by April 19, 1991. Reinforcement training for the operators on the simulator will be complete by August 1, 1991.



CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER VIOLATION:

The recently completed Niagara Mohawk Nuclear Division reorganization provides for improved clarification of roles and responsibilities. The responsibility for maintenance and development of the Operations department procedures, including OPs and EOPs, now resides with a single individual, the General Supervisor of Operations Support. This organizational feature will provide better accountability for Operations Department technical review. Safety Evaluations are now prepared by Nuclear Engineering rather than the Licensing engineer. This allows Engineering to more effectively interact on technical and licensing issues with Nuclear Generation and Nuclear Support.

The Nuclear Division will be implementing two new Directives; Project and Task Management (NDD-PTM) and Evaluation and Corrective Action for Deviation/Event Reporting (NDD-ECA). The Project and Task Management Directive will establish requirements and define responsibilities for managing Nuclear Division "Tasks" and "Projects" in a uniform manner consistent with governing regulatory requirements and the Nuclear Division Business Plan. The Nuclear Division will also implement a Deviation Event Report (DER) system. A systematic process will be applied to issues requiring evaluation and implementation, such as 10CFR50, Appendix J. Among other things, this process is designed to identify clearly the accountability for actions necessary to disposition the DER. This process also formalizes a review of completed disposition actions for effectiveness in resolving the DER issue.

New Administrative Procedures for procedure use and control, procedure preparation, review and issue, and procedure change evaluations are being implemented per the schedule of the Business Plan. These procedures will provide an improved 10CFR50.59 review process for procedures and will identify procedure reviewers. The 10CFR50.59 reviewers will attend additional training on 10CFR50.59 before implementation of the new administrative procedures.

DATE OF FULL COMPLIANCE:

On-shift training for all operating crews on the revised OP-14 will be complete by April 19, 1991. Full compliance will be achieved by August 1, 1991 with the reinforcement training of operators on the simulator.

