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SUBJECT: Informs that licensee completed actions indicated in 920313 ltr re performance of safety-related check valves.

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B. Ralph Sylvia
Executive Vice President
Nuclear

April 29, 1993
NMP2L 1379

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

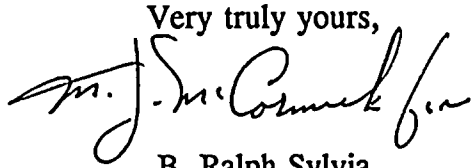
Re: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69
TAC No. M81189

Gentlemen:

SUBJECT: REPORT ON EFFECTIVENESS OF LICENSEE ACTIVITIES REGARDING THE PERFORMANCE OF SAFETY-RELATED CHECK VALVES - NINE MILE POINT NUCLEAR STATION, UNIT 2

The NRC staff conducted an audit of Niagara Mohawk Power Corporation's (NMPC) activities regarding the performance of safety-related check valves at Nine Mile Point Nuclear Station, Unit 2 on August 5 through August 9, 1991. In the NRC audit report dated February 7, 1992, the Staff requested that NMPC provide a schedule for responding to the audit report areas of concern. By letter dated March 13, 1992, (NMP2L 1342), NMPC provided that schedule and committed to confirm with the Staff by April 30, 1993 that all activities had been performed. The purpose of this letter is to inform you that NMPC has completed all actions as indicated in our March 13, 1992 letter. The attachment presents a summary of NMPC's resolution of the outstanding areas of concern.

Very truly yours,



B. Ralph Sylvia
Exec. Vice President-Nuclear

MJJ/pr
Attachment

xc: Regional Administrator, Region I
Mr. W. L. Schmidt, Senior Resident Inspector
Mr. R. A. Capra, Director, Project directorate I-1, NRR
Mr. J. E. Menning, Project Manager, NRR

A001

ATTACHMENT

Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

INTRODUCTION

An audit of the Nine Mile Point Unit 2 (NMP2) check valve program was performed on August 5 through August 9, 1991. The audit report, dated February 7, 1992, contained a number of specific concerns which were summarized in Section 14 of the report. NMPC has resolved all of the outstanding concerns raised as described below.

NRC CONCERN C: Although current management support and involvement in check valve activities is evident, the delays in implementing the Check Valve Program, lack of an overall program guidance document, and continuing problems with Clow check valves in the Service Water System indicate that this support and involvement were not as timely and aggressive as it should have been. (Section 6)

The programmatic issues regarding management support and involvement in check valve activities were addressed in NMPC's letter dated March 13, 1992 (NMP2L 1342). The overall program guidance document was submitted to the Staff by letter dated August 26, 1992 (NMP2L 1351). The problems with the service water check valves are being actively addressed as Resident Inspector unresolved item 91-17-03 and are not considered an open item resulting from this audit report.

NRC CONCERN E: Where practical, the acceptance criteria in test procedures that assess reverse flow closure should be more objective or quantifiable. (Section 6)

The evaluation of check valve reverse flow acceptance criteria and test methods that incorporate "little or no flow" terminology was completed on September 10, 1992. A detailed review of the required function of these check valves showed that the original system design did not require a quantitative leak rate for these particular check valves because only a significant failure of the check valves to seat would impact the performance of the system. With this in mind, NMPC developed procedures to assure that these check valves would close under reverse flow. This qualitative method verifies by visual means that the check valves have closed and that there is "little or no flow" leaking by the valves. Therefore, NMPC concurs that the current acceptance criteria being used, i.e., "little or no flow", is the most practical method for a qualitative leak test to assess the operability of the valve.

NRC CONCERN G: Due to the unique inverted installation of certain diesel generator starting air system check valves, current testing may not verify their capability to perform their safety function under all accident conditions. The audit team concluded that additional justification of the testing methodology should be provided to ensure proper diesel generator starting capability under all postulated failure mechanisms. (Section 6)

The evaluation of the capability of starting air system check valves to perform their safety function under all accident conditions was completed on May 7, 1992. The diesel generator manufacturer included these check valves in the air start system to mitigate the consequences of a catastrophic failure of the air line upstream of the starting air control valve. It was not the intent of the design, i.e., the inverted position of these valves and the orifice in the disc, that these valves be assumed to function during any other type of system failure. The system design relies on redundant air starting systems and air receiver volumes sufficient for five successful consecutive starts for failures less than catastrophic.

After reviewing the testing method and acceptance criteria, NMPC believes the current testing appropriately verifies the ability of these check valves to perform their intended function during a catastrophic failure, and accordingly, no change to the testing procedure is required.

NRC CONCERN J: The audit team concluded that improvements in current trending activities should be considered. Evidence of strong trending activities was not observed by the team. (Section 8)

A trending program for check valves has been implemented at NMPC in accordance with the Check Valve Program Plan. The first annual review was completed on July 30, 1992. This review will continue to be performed every year until trending data indicate that a different frequency of evaluation is warranted.

NRC CONCERN K: Weaknesses were observed in the training program for personnel performing check valve maintenance. Training materials including related procedures were general and did not provide detailed information. (Section 12)

The lesson plan on basic valves has been revised to include disassembly, inspection, reassembly, troubleshooting and hands-on laboratory training of check valves. This revision of the lesson plan became effective on September 17, 1992. Training on the Anchor-Darling 900# testable check valve was completed on March 4, 1993.