

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL:50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha    05000410  
 AUTH.NAME                    AUTHOR AFFILIATION  
 KINSLEY,J.R.                Niagara Mohawk Power Corp.  
 MUELLER,J.H.                Niagara Mohawk Power Corp.  
 RECIP.NAME                 RECIPIENT AFFILIATION

SUBJECT: LER 93-011-00:on 931119,reactor scram & ESF actuation  
 occurred.Caused by poor work organization & planning.  
 Work planning guide revised & procedure changes will be  
 evaluated.W/931220 ltr.

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 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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	AEOD/DSP/TPAB	1	1	AEOD/ROAB/DSP	2	2
	NRR/DE/EELB	1	1	NRR/DE/EMEB	1	1
	NRR/DORS/OEAB	1	1	NRR/DRCH/HHFB	1	1
	NRR/DRCH/HICB	1	1	NRR/DRCH/HOLB	1	1
	NRR/DRIL/RPEB	1	1	NRR/DRSS/PRPB	2	2
	NRR/DSSA/SPLB	1	1	NRR/DSSA/SRXB	1	1
	<u>REG FILE</u> 02	1	1	RES/DSIR/EIB	1	1
	RGNI FILE 01	1	1			
EXTERNAL:	EG&G BRYCE,J.H	2	2	L ST LOBBY WARD	1	1
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**NIAGARA  
MOHAWK**

NINE MILE POINT—UNIT 2/P.O. BOX 63, LYCOMING, NY 13093

John H. Mueller  
Plant Manager-Unit 2  
Nuclear Generation

December 20, 1993  
NMP89346

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: Docket No. 50-410  
LER 93-11

Gentlemen:

In accordance with 10CFR50.73 (a)(2)(iv), we are submitting Licensee Event Report 93-11,  
"Reactor Scram and ESF Actuation Caused by Poor Work Organization and Planning."

A 10CFR50.72 notification of this event was made on November 19, 1993 at 0515 hours.

Very truly yours,

*John H. Mueller for*

John H. Mueller  
Plant Manager - NMP2

JHM/JTP/lmc  
Attachment

xc: Mr. Thomas T. Martin, Regional Administrator, Region I  
Mr. Barry S. Norris, Senior Resident Inspector

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>Nine Mile Point Unit 2</b>	DOCKET NUMBER (2) <b>0 5   0 0   0 4   1 0</b>	PAGE (3) <b>1 OF 017</b>
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TITLE (4)  
**Reactor Scram and ESF Actuation Caused by Poor Work Organization and Planning**

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		
11	19	93	93	011	0	12	20	93	N/A		
									DOCKET NUMBER(S) <b>0 5   0 0   0 0</b>		

OPERATING MODE (9) <b>4</b>	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)									
POWER LEVEL (10) <b>01010</b>	20.402(b)	20.405(c)	<input checked="" type="checkbox"/>	50.73(a)(2)(iv)	73.71(b)					
	20.405(a)(1)(i)	50.36(c)(1)	<input type="checkbox"/>	50.73(a)(2)(v)	73.71(c)					
	20.405(a)(1)(ii)	50.36(c)(2)	<input type="checkbox"/>	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)					
	20.405(a)(1)(iii)	50.73(a)(2)(ii)	<input type="checkbox"/>	50.73(a)(2)(viii)(A)						
	20.405(a)(1)(iv)	50.73(a)(2)(iii)	<input type="checkbox"/>	50.73(a)(2)(viii)(B)						
	20.405(a)(1)(v)	50.73(a)(2)(iii)	<input type="checkbox"/>	50.73(a)(2)(ix)						

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME <b>James R. Kinsley, General Supervisor I&amp;C Maintenance NMP2</b>		AREA CODE <b>315</b>	<b>349-7502</b>

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		
X	J B	L O V	4 2 3 0	N							

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)			<input checked="" type="checkbox"/> NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On November 19, 1993 at 0337 hours while performing reactor vessel hydrostatic leak testing; Nine Mile Point Unit 2 (NMP2) received a Division II Redundant Reactivity Control System (RRCS) initiation signal, and a Division II Emergency Core Cooling System (ECCS) initiation signal. This caused a Division II Alternate Rod Insertion (ARI), a trip of the "A" reactor recirculation pump, a Division II Emergency Diesel Generator (EDG) start, and a start of Residual Heat Removal (RHR) pumps "B" and "C". The reactor was in mode 4 (Cold Shutdown) with one control rod fully withdrawn for scram time testing, reactor vessel level at approximately 457", and reactor pressure at approximately 1000 psig. At 0338 hours, a Reactor Protection System (RPS) full reactor scram signal was received due to a high level in the Scram Discharge Volume (SDV).

The root cause of this event was poor work organization and planning. The variable leg instrument root valve was closed prior to isolating instruments on the affected instrument line. The process of valving a level transmitter out of service then caused a hydraulic perturbation in the reference leg instrument line, initiating the Division II RRCS and ECCS signals.

Corrective actions include direction for Instrument and Control (I&C) personnel to review maintenance work packages that could affect plant instrumentation. Maintenance and Operations personnel will receive training in this event. The Work Planning Guide has been revised and other procedure changes will be evaluated.



**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Nine Mile Point Unit 2	DOCKET NUMBER (2)  0 5 0 0 0 4 1 0	LER NUMBER (6)			PAGE (3)	
		YEAR 9 3	SEQUENTIAL NUMBER 0 1 1	REVISION NUMBER 0 0	0 2	OF 0 7

TEXT (If more space is required, use additional NRC Form 366A's) (17)

**I. DESCRIPTION OF EVENT**

On November 19, 1993 at 0337 hours while performing reactor vessel hydrostatic leak testing, Nine Mile Point Unit 2 (NMP2) received a Division II Redundant Reactivity Control System (RRCS) initiation signal, and a Division II Emergency Core Cooling System (ECCS) initiation signal. This caused a Division II Alternate Rod Insertion (ARI), a trip of the "A" reactor recirculation pump, a Division II Emergency Diesel Generator (EDG) start, and a start of Residual Heat Removal (RHR) pumps "B" and "C". The reactor was in mode 4 (Cold Shutdown) with one control rod fully withdrawn for scram time testing, reactor vessel level at approximately 457", and reactor pressure at approximately 1000 psig. At 0338 hours, a Reactor Protection System (RPS) full reactor scram signal was received due to a high level in the Scram Discharge Volume (SDV).

During the performance of Instrument and Control Surveillance Procedure N2-ISP-ISC-R002, "Reactor Instrument Line Excess Flow Check Valve Operability Test with Process Fluid and Pressure," excess flow check valve 2ISC\*EFV40 failed to close properly (see Figure 1). This valve is located on the variable leg of the fuel zone level transmitter 2ISC\*LT13B. The reference leg for this level transmitter is the "B" instrument reference leg. A Work Order was initiated to replace the valve. At 0119 hours, a red markup (tagout) was placed on root valve 2ISC\*V40 (on the variable leg), isolating the excess flow check valve from the reactor vessel. At this time, the fuel zone level recorder indicated that the reactor vessel level went from offscale high to offscale low. However, other reactor vessel level indications remained offscale high due to the reactor being flooded up for the hydrostatic leak testing. The low level on the fuel zone recorder indicates a loss of pressure in the variable leg of the fuel zone level transmitter. At approximately 0337 hours, the fuel zone level transmitter 2ISC\*LT13B was being taken out of service to support excess flow check valve replacement. During this process of valving the fuel zone level transmitter out of service, a hydraulic perturbation was experienced on the "B" instrument reference leg. The perturbation caused a pressure spike on the "B" reference leg for reactor level transmitters 2ISC\*LT7B, 9B, 9D, 8C and 8D, and reactor high pressure transmitter 2ISC\*PT4B, initiating the event described in the above paragraph. There were no perturbations experienced on any of the other instrument reference legs.

All systems responded as expected, and by 0412 hours all systems had been returned to their pre-event status with reactor pressure stabilized at approximately 800 psig.

**II. CAUSE OF EVENT**

The root cause analysis performed for this event determined the root cause to be poor work organization and planning. Specifically, work planning was not coordinated with all departments involved in the task and the work package contained an inadequate work plan. The variable leg instrument root valve was closed by the Operations Department via a red markup (tagout) prior to the I&C Department valving the fuel zone level transmitter 2ISC\*LT13B out of service. When the variable leg instrument root valve was closed, the pressure on the variable leg





LICENSEE EVENT REPORT (LER)  
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**II. CAUSE OF EVENT (cont.)**

of the level transmitter decreased, indicating a leakage path downstream of the root valve. Then, the process of valving the level transmitter out of service caused a hydraulic perturbation in the instrument reference leg. The possible causes for this hydraulic perturbation include:

1. not fully closing the transmitter's reference leg isolation valve,
2. dirt or debris on the valve seat of the transmitter's reference leg isolation valve,
3. a damaged seat or disc that allowed leakage past the transmitter's reference leg isolation valve seat, or
4. an improper valving sequence for isolating the level transmitter.

Written statements by the I&C technicians that performed the valving sequence indicated that a valving error was not made. Followup testing on November 25, 1993 of the transmitter's reference leg isolation valve indicated that the isolation valve was in good physical condition, and did not leak by the seat as a result of valve seat or disc damage.

The exact cause of the perturbation is not known. It is postulated that the level transmitter's isolation valve on the reference leg leaked by, due to not being completely closed, because of inadequate torque or dirt/debris under the valve seat which was flushed clear prior to the testing on November 25, 1993. The reference leg momentarily depressurized when the level transmitter equalization valve was opened. This was caused by the high differential pressure that existed between the reference leg and variable leg of the level transmitter. This pressure difference initiated a surge in the reference leg which caused a pressure spike on the level and pressure transmitters associated with that reference leg.

**III. ANALYSIS OF EVENT**

This event is reportable in accordance with 10CFR50.73 (a)(2)(iv), "any event or condition that results in manual or automatic actuation of an engineered safety feature (ESF) including the reactor protection system (RPS)."

The hydraulic perturbation in the "B" instrument reference leg sent a pressure spike to several level transmitters and one pressure transmitter on the reference leg. This resulted in a Division II Redundant Reactivity Control System initiation on a reactor vessel level 2 (108.8") signal. The RRCS caused an Alternate Rod Insertion (ARI) and a trip of reactor recirculation pump "A", the only recirculation pump running at the time. The RRCS caused the Alternate Rod Insertion (ARI) to insert the one control rod that was fully withdrawn for scram time testing. The logic for ARI is two out of two taken once. Two level transmitters on the "B" instrument reference leg can cause an RRCS initiation.



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TEXT CONTINUATION

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		9   3	-   0   1   1	-   0   0	0   4	OF	0   7

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**III. ANALYSIS OF EVENT (cont.)**

The ARI function caused the SDV to fill with water. Then a full scram in both Divisions I and II of the RPS was caused by a high level in the Scram Discharge Volume (SDV). All of the control rods were fully inserted in the core at the time of the RPS full scram signal (i.e., the one control rod initially withdrawn for scram timing was inserted by the ARI function of RRCS).

The hydraulic perturbation also caused a Division II Emergency Core Cooling System initiation at an indicated reactor vessel level of 17.8" (Level D). This resulted in a Division II Emergency Diesel Generator (EDG) start as well as a Residual Heat Removal (RHR) "B" and "C" initiation in the Low Pressure Coolant Injection (LPCI) mode. The EDG did not load onto its bus, and RHR did not inject into the reactor vessel.

A Work Order was written to troubleshoot the leak on the variable leg of LT13B. A very small leak from the drain valve on the variable leg was verified. The leak was evaluated by Operations to be so small that it didn't affect operability of the transmitters on this variable leg.

During the event, reactor water level was maintained at approximately 457", reactor pressure decreased from approximately 1000 psig to approximately 800 psig. Reactor coolant system temperature remained at 186 degrees Fahrenheit. The duration of this event was approximately 34 minutes.

Because the reactor was in mode 4 (Cold Shutdown) with adequate cooling provided for the reactor core, the automatic initiations that occurred were conservative and the above systems performed as designed. There were no adverse consequences to the health and safety of the general public or plant personnel.

**IV. CORRECTIVE ACTIONS**

The immediate corrective action was to verify that all control rods were fully inserted in the core. Subsequently, the automatic initiations were confirmed, and RRCS, ARI and RPS were reset. All systems were returned to their pre-event status. Additionally, the following corrective actions have been or will be taken:

1. The Work Planning Guide has been revised to give direction to all Maintenance Planning Departments on work associated with plant instrumentation. I&C personnel will now review all maintenance work packages which involve, or have potential impact on, plant instrumentation.



LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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**IV. CORRECTIVE ACTIONS (cont.)**

2. Generation Administrative Procedure GAP-OPS-02, "Control of Equipment Markups," will be evaluated for revision by July 1, 1994 to include a requirement to perform an independent review of proposed markups that involve plant instrumentation by the department responsible for the instrumentation.
3. All Maintenance and Operations personnel will receive training to include a review of this event and previous similar LERs (90-02, 90-04, 88-66 and 87-23), emphasizing possible effects of instrument valve manipulations for pressure, level and flow instrumentation. A Training Review Request will be initiated by January 1, 1994.
4. Operations Department procedures N2-OP-101C, "Plant Shutdown," N2-OP-36B, "Redundant Reactivity Control System," and N2-OSP-ISC-R301, "ATWS Recirculation Pump Trip Logic System Functional Test," will be revised to remove the RRCS from service when it is not required. The hydrostatic leakage test procedures N2-OPS-RPV-@001 and N2-OSP-RPV-@002 will be evaluated for possible revisions to remove equipment from service that may cause initiations. These actions will be completed by April 1, 1994.
5. Appropriate I&C Department instrument surveillance procedures and maintenance procedures for the Redundant Reactivity Control System will be revised so that upon completion of the procedure, Operations will be directed to remove the RRCS from service when it is not required. These procedures will be revised by December 31, 1994.
6. Problem Identification (PID) #3723 was written to repair/replace the drain valve on the variable leg of level transmitter 2ISC\*LT13B. This work will be done during the fourth refueling outage, currently scheduled for Spring 1995.
7. A Lessons Learned Transmittal (LLT) will be issued to appropriate Nuclear Division personnel to communicate the lessons learned from this event. The LLT will discuss instrument line sensitivity and that I&C must be involved in the planning for all work involving instrument lines. This will be issued by January 1, 1994.

**V. ADDITIONAL INFORMATION**

- A. Failed components: Hoke Inc., drain valve, General Electric part number 169C8259P003, NMPC component ID 2CES\*RAK009
- B. Previous similar events:

NMP2 has experienced four (4) similar events in the past. LER 90-04 describes a perturbation in a level instrument variable leg, resulting in a reactor scram signal. LER 90-02 describes a perturbation in a variable leg, common to both pressure and level



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**V. ADDITIONAL INFORMATION (cont.)**

transmitters, that resulted in a reactor scram signal. LER 88-66 describes a pressure transient in a variable leg, common to both pressure and level transmitters, that resulted in an ARI signal. LER 87-23 describes an event where increased pressure in a sensing line of a pressure transmitter caused a shutdown cooling isolation. All of these events occurred while the reactor was shut down, and the causes of these events were varied.

Two corrective actions from a previous LER could have prevented the Division II RRCS initiation and the RPS scram, but would not have prevented Division II ECCS initiation. LER 88-66 included a corrective action to revise operating procedure N2-OP-101C, "Plant Shutdown," to remove the RRCS from service while the plant is shut down. This revision was done, but was subsequently removed from the procedure. The current procedure writer's guide implemented in late 1989, protects steps that result from commitments. This commitment pre-dates the current writer's guide. Because of this, a Deviation Event Report has been written to ensure that procedural commitments from past LERs are incorporated into procedures and that these procedure steps are protected. Secondly, the priority of modification no. PN2Y85MX089, to relocate RRCS level and pressure instruments to provide separate instrument reference legs to the transmitters, was to be evaluated. The priority of the modification was evaluated and the modification was canceled. The modification was canceled because administrative controls were considered sufficient.

**C. Identification of components referred to in this LER:**

COMPONENT	IEEE 803 FUNCTION	IEEE 805 SYSTEM ID
Level Transmitter	LT	NA
Pressure Transmitter	PDT	NA
Reactor Protection System	NA	JC
Residual Heat Removal System	NA	BO
Low Pressure Coolant Injection System	NA	BO
Emergency Diesel Generator	DG	NA
Redundant Reactivity Control System	NA	NA
Alternate Rod Insertion	NA	NA
Control Rod	NA	AA
Reactor Recirculation Pump	P	AD
Drain Valve	LOV	JB





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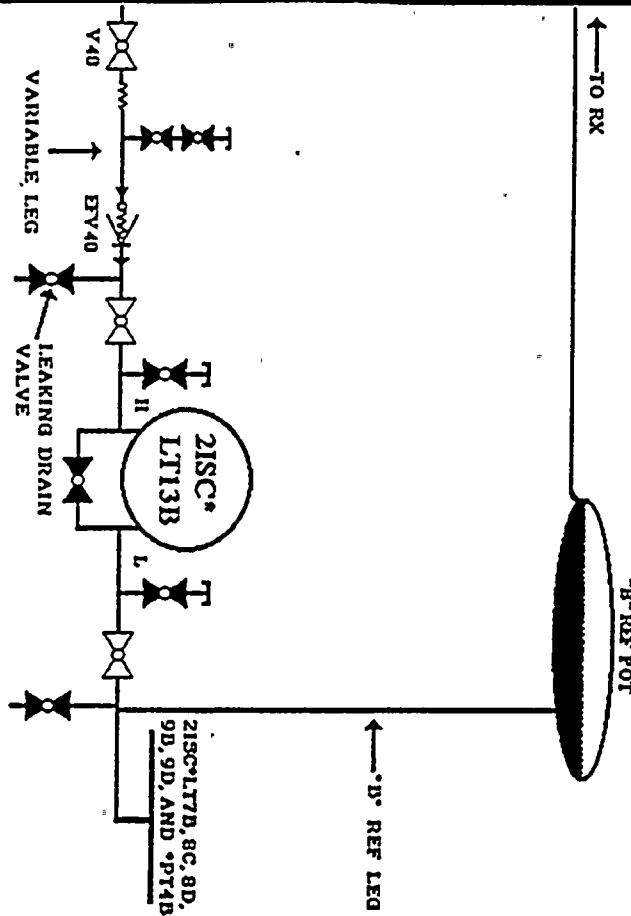
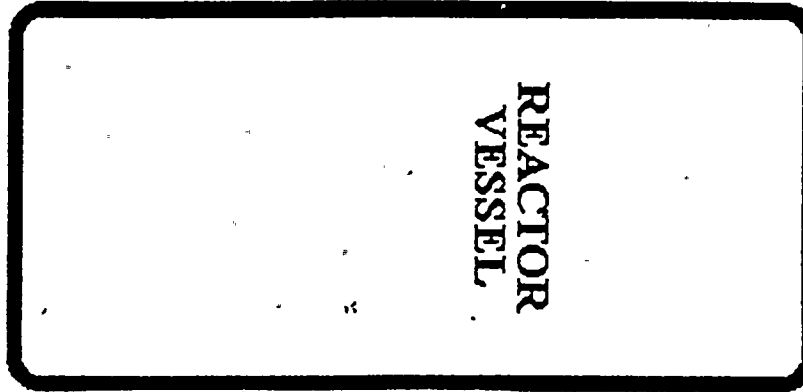
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THIS IS A SIMPLIFIED DIAGRAM  
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FIGURE 1

