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SUBJECT: Special rept: on 950306, setpoints of switches found to be higher than required by TSS & rendered inoperable. Caused by personnel error. Procedure revised & switches correctly set.

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March 16, 1995
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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

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

Subject: Special Report

Gentlemen:

In accordance with Nine Mile Point Unit 2 (NMP2) Technical Specification 3.3.7.2 ACTION Statement "a", we are submitting the following Special Report concerning the inoperability of the Seismic Monitoring Instrumentation (specifically, the triaxial seismic switches on the Reactor Building Mat el. 175').

Event Description

On March 6, 1995 at 0900 hours, while performing Instrument Surveillance Procedure N2-ISP-ERS-SA103, "Semiannual Functional/Calibration Test of the Triaxial Seismic Switch Instrument Channel," on the triaxial seismic switches located on the Reactor Building Mat el. 175', the setpoints of the switches were found to be set higher than required by Technical Specifications, rendering them inoperable. This deviation was discovered by Niagara Mohawk, with assistance from an instrument vendor technician in pinpointing the incorrect part of the procedure that caused this deviation. This condition has existed since the last performance of the procedure on September 14, 1994. Inoperability of the triaxial seismic switches for more than 30 days requires the preparation and submission of this Special Report.

Cause of the Event

The root cause for the triaxial seismic switch setpoints being set higher than the Technical Specification requirements was a personnel error in that an incorrect change to procedure N2-ISP-ERS-SA103 was made.

In September 1993, a change was made to the procedure to add "Examples" as an aid to the procedure performer in reading the test equipment. This change was thought to be a clarification to the procedure and not a change to technical requirements. Therefore, this change was done as an editorial "Procedure Change Evaluation (PCE)," which doesn't require an independent technical review. Before the change was made, the instrument

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vendor was contacted by telephone. The vendor agreed with the proposed change, believing the discussion was for the seismic trigger system rather than the seismic switches.

In December 1993 and March 1994, the procedure was successfully run by a technician considered to be an expert on the system. Based on his experience, he did not have the need to use the "Examples" in the procedure to set up the test equipment. Thus, during these tests he did not recognize that the "Examples" were incorrect. Another technician, performing the procedure in September 1994, used the "Examples" as a guide to set up the test equipment, resulting in setpoints outside of Technical Specifications.

Corrective Actions

The following corrective actions have been or will be taken:

1. Procedure N2-ISP-ERS-SA103 was revised, via a technical PCE, to be correct. Coaching guidance and guidelines for editorial PCE changes were issued since the incorrect editorial PCE change in September 1993. Today, this change would not be made as an editorial PCE based on these guidelines.
2. The setpoints of the triaxial seismic switches were correctly set using procedure N2-ISP-ERS-SA103, and the switches were declared operable on March 6, 1995.
3. All seismic monitoring instrumentation surveillances will be reviewed to ensure the correct instrumentation set up data is included, and to incorporate the "Examples" into the Technical Specification acceptance criteria.
4. This event will be reviewed with Instrument and Control personnel. The technicians involved with the incorrect procedure change and with performing the procedure have participated in the root cause investigation and corrective actions.

Very truly yours,



Kim A. Dahlberg
Plant Manager NMP2

KAD/JTP/lmc

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

