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SUBJECT: LER 94-003-01:on 940406,Missed Tech Spec Surveillance discovered.Caused by inadequate management.Correcting preventive maint-Surveillance Test database.W/960109 ltr.

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NIAGARA MOHAWK

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January 9, 1996
NMP1L 1020

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

RE: Docket No. 50-220
LER 94-03, Supplement 1

Gentlemen:

In accordance with 10CFR50.73 (a)(2)(i)(B), we are submitting Supplement 1 to LER 94-03, "Missed Technical Specification Surveillance Caused by Inadequate Change Management." This supplement provides additional information regarding 10CFR50 Appendix J testing requirements. Specifically, the evaluation of this event determined that the frequency of testing the drywell personnel and emergency airlocks had not been in compliance with 10CFR50 Appendix J since the rule became effective. This information is provided to ensure completeness, and was recommended by the Safety Review and Audit Board.

Very truly yours,

Norman L. Rademacher
Plant Manager - NMP1

NLR/AFZ/lmc
Attachment

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

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NRC FORM 366 (6-89) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104
EXPIRES: 4/30/92
ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH 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.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Nine Mile Point Unit 1	0 5 0 0 0 2 2 0	1 OF 0 6

TITLE (4)

Missed Technical Specification Surveillance Caused By Inadequate Change Management

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	DOCKET NUMBER(S)
											N/A	0 5 0 0 0
0 4	0 6	9 4	9 4	—	0 0 3	—	0 1	0 1		9 6	N/A	0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
N		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)	0 0 0	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
John C. Aldrich, Maintenance Manager	AREA CODE 3 1 5 — 3 4 9 - 4 1 8 2

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	

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

On April 6, 1994 at 1517 hours, Maintenance Department personnel at the Nine Mile Point Nuclear Station Unit 1 (NMP1) discovered a violation of Technical Specification Surveillance Requirements. Specifically, the drywell personnel air lock and the drywell emergency air lock had not been leak rate tested every six months as required by Technical Specifications. At the time of discovery, NMP1 was in cold shutdown for a forced outage and primary containment integrity was not required.

The root cause of this event was inadequate change management. Personnel failed to maintain the Preventive Maintenance-Surveillance Test (PMST) database (the scheduling tool for preventive maintenance and surveillance testing activities) consistent with the frequency specified in the surveillance procedure and the Technical Specification requirements.

Corrective actions include correcting the PMST database frequency codes, performing the appropriate leak rate tests, strengthening the process for implementing Technical Specification amendments and changing the PMST database, providing training to individuals tasked with updating and changing the PMST database and issuing a Lessons Learned Transmittal.

I. DESCRIPTION OF EVENT

On April 6, 1994 at 1517 hours, Maintenance Department personnel at the Nine Mile Point Nuclear Station Unit 1 (NMP1) discovered a violation of Technical Specification Surveillance Requirements. Specifically, the drywell personnel air lock and the drywell emergency air lock had not been leak rate tested every six months as required by Technical Specifications. At the time of discovery, NMP1 was in cold shutdown for a forced outage and primary containment integrity was not required.

In preparation for performance of procedure N1-ISP-201-V501, "Type B Containment Isolation Air Lock Leak Rate Test Penetration X-1A Drywell Personnel Air Lock," Maintenance personnel identified that the last completion of the procedure was April 16, 1993. Technical Specification Surveillance Requirement 4.3.3.d(3)c states "The air locks shall be tested every six months at a test pressure of 35 psig." Similarly, procedure N1-ISP-201-V502, "Type B Containment Isolation Air Lock Doors Leak Rate Test Penetration X-1B Drywell Emergency Air Lock," was last performed in April 1993. These air lock leak rate tests were not performed as required in October 1993, resulting in a missed Technical Specification Surveillance Requirement.

II. CAUSE OF EVENT

The root cause of this event was inadequate change management. Personnel failed to maintain the Preventive Maintenance-Surveillance Test (PMST) database consistent with the frequency specified in the surveillance procedures and Technical Specification requirements.

In February 1992, Niagara Mohawk Power Corporation proposed an amendment to the Technical Specifications that would, in part, increase the frequency of the drywell personnel air lock and drywell emergency air lock leak rate testing to every six (6) months. In January 1993, plant management decided to increase the frequency of the air lock testing to once per six (6) months in anticipation of the amendment approval, and thereby directed that the appropriate procedures and the PMST database be revised accordingly. Maintenance Department personnel correctly revised the procedures. However, the Technical Support engineer tasked with revising the PMST database changed the description field, but erroneously elected not to change the frequency code, which is used to trigger the surveillance activity. This erroneous action was based upon his belief that the frequency code should not be changed until approval of the Technical Specification Amendment so as not to cause an inconsistency between the database and the Technical Specifications. When the Technical Specification Amendment was approved and implemented in July 1993, a review of the air lock leak rate surveillance procedures determined that these procedures were consistent with the new Technical Specification requirement because of the changes

II. CAUSE OF EVENT (Cont'd.)

already made in January 1993. Since no changes were necessary, no change to the PMST database was initiated because it was assumed that the PMST database was already consistent with the procedures' (and thus Technical Specification) frequency requirements.

III. ANALYSIS OF EVENT

This event is reportable in accordance with 10CFR50.73 (a)(2)(i)(B), "any operation or condition prohibited by the plant's Technical Specifications."

The containment air lock leak rate tests were last successfully performed in April 1993, at the end of the Spring 1993 Refuel Outage at NMP1. From April 1993 until the forced outage in April 1994, the air lock doors had not been opened and the seals had not been disturbed. During the forced outage, the seals in the drywell personnel air lock were replaced prior to the pre-startup leak test because of mechanical damage incurred during the forced outage. Therefore the subsequent leak test was not indicative of the air lock leak tightness during the previous power operating period. However, a review of the nitrogen make up requirements for the primary containment indicate no gross leakage from the primary containment for this time period. The drywell emergency air lock seals, however, were not replaced and therefore the acceptable leak test results obtained during the forced outage were indicative of the air lock condition during the previous operating period. Thus, it is reasonable to conclude that any leakage from the air locks would not have adversely affected the overall primary containment leak rate allowed by Technical Specifications. Furthermore, the allowable primary containment leakage rate is conservative, by a factor of two, to prevent exceeding 10CFR100 limits following an accident. Therefore, there were no adverse consequences to the health and safety of the general public or plant personnel as a result of this event.

IV. CORRECTIVE ACTIONS

Corrective actions resulting directly from this event are:

1. The PMST database frequency codes for the leak rate surveillance testing of the air locks were changed to reflect the surveillance procedures and the Technical Specification Surveillance Requirements.

IV. CORRECTIVE ACTIONS (Cont'd.)

2. The leak rate surveillance tests for the personnel air lock and the emergency personnel air lock were performed on April 11, 1994, returning NMP1 to compliance with the Technical Specifications.

3. The Technical Support engineer was counseled as to his error in not changing the PMST frequency code.

4. The process for implementing approved Technical Specification amendments will be strengthened, via a procedure change, by providing for a more rigorous and formalized verification of completion of actions. This will be completed by June 30, 1994.

Prior to plant startup from the forced outage, a comprehensive review of the PMST database was performed. The Technical Specification reference, surveillance procedure title, surveillance frequency code, description and special note fields were reviewed to ensure compliance with the Technical Specifications. Numerous discrepancies were found, the nature of which were references to Technical Specification sections that had been amended, notes referencing Technical Specification Interpretations and surveillance tests conducted more frequently than necessary. Additionally, the Operations Department performed an independent review of the PMST database surveillance requirements and frequencies to ensure they were in compliance with Technical Specifications. No discrepancies were found that resulted in a Technical Specification violation.

Corrective actions resulting from this PMST database review are:

1. Individuals tasked with ensuring accuracy and updating the PMST database will be trained in the PMST database. This training will include how PMST changes are made, how PMST reports are generated, and data field definitions.

2. The process for changing the PMST database will be strengthened, via a procedure change, to require an independent technical review and verification of changes made to the PMST database.

3. The discrepancies found during the reviews will be corrected as appropriate.

All the above actions will be completed by June 30, 1996.

A Lessons Learned Transmittal (LLT) will be issued for this event.

V. ADDITIONAL INFORMATION

A. Failed components: none.

B. Previous similar events:

Nine Mile Point Unit 1 has had previous missed Technical Specification surveillances. None have involved the primary containment personnel air locks or errors made changing the PMST database. Therefore, corrective actions from these LERs would not have prevented this event.

C. Supplemental information:

This LER was submitted to comply with the reportability requirements of 10CFR50.73, and addressed the Technical Specification violation regarding the surveillance testing requirements for the containment personnel and emergency air locks. Further, the evaluation of this event had prompted Niagara Mohawk to report that the frequency of testing the air locks had also not been in compliance with 10CFR50 Appendix J since the rule became effective. Specifically, the rule requires that the air locks be tested every six months, but, prior to a Technical Specification change implemented in July 1993 and subsequently complied with in April 1994, the air locks were only tested once each fuel cycle in accordance with the Technical Specifications in effect at that time.

This information was not included in the original LER, however, as a result of a subsequent review, the Safety Review and Audit Board requested that this information be provided to ensure completeness of reporting for this event. During the period that the Appendix J rule was not being properly implemented, Niagara Mohawk had considerable communication and negotiation with the NRC regarding the methods of implementing Appendix J at NMP1. Technical Specification amendments and Schedular Exemption requests were submitted to address the numerous issues related to implementation of Appendix J requirements, yet Niagara Mohawk did not identify the need to submit a schedular exemption or take other appropriate action to address this particular deviation from the Appendix J requirements.

Technical Specification Amendment No. 140 (implemented in July 1993), in conjunction with earlier amendments and Schedular Exemptions, brought the NMP1 Technical Specifications into compliance with the regulations. The air lock test performed in April 1994, as described in the original version of this LER, returned NMP1 to compliance with the Technical Specifications. The last remaining Appendix J issue involved the Core Spray Isolation Valves, for which a schedular exemption

V. ADDITIONAL INFORMATION (Cont'd.)

had been granted through the 1995 refueling outage, and this issue was resolved with the issuance of Amendment No. 154 in March of 1995. At this time there are no outstanding Appendix J implementation issues at NMP1.

D. Identification of components referred to in this LER:

COMPONENT	IEEE 803 EIIS FUNCTION	IEEE 805 SYSTEM ID
Primary Containment	N/A	NH
Air Lock	AL	NH