

CATEGORY 1

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 FACIL:50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Powe 05000220
 AUTH.NAME AUTHOR AFFILIATION
 ALDRICH,J.C. Niagara Mohawk Power Corp.
 RADEMACHER,N.L. Niagara Mohawk Power Corp.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 95-003-01:on 950516,TS surveillance tests not performed at required frequency becuae of cognitive error.Verified three surveillances missed during RF012.W/960713 ltr.

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NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093

July 13, 1996
NMP1L 1099

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

RE: Docket No. 50-220
LER 95-03, Supplement 1

Gentlemen:

In accordance with 10CFR50.73 (a)(2)(i)(B), we are submitting Supplement 1 to LER 95-03, "Technical Specification Surveillance Tests not Performed at the Required Frequency Because of Cognitive Error." This supplement describes the identification of an additional instance of the problem identified in the original submittal of LER 95-03, which was discovered as a result of the corrective actions described in the original submittal.

Very truly yours,

Norman L. Rademacher
Plant Manager - NMP1

RBA/AFZ/lmc
Attachment

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

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LICENSEE EVENT REPORT (LER)

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 1

DOCKET NUMBER (2)

5 0 0 0 2 2 0

PAGE (3)

1 OF 5

TITLE (4) Technical Specification Surveillance Tests Not Performed At The Required Frequency Because Of Cognitive Error

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)			
05	16	95	95	003	01	07	13	96	N/A	0 5 0 0 0			
									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)										
POWER LEVEL (10)			<input type="checkbox"/> 20.402(b) <input type="checkbox"/> 20.405(a)(1)(i) <input type="checkbox"/> 20.405(a)(1)(ii) <input type="checkbox"/> 20.405(a)(1)(iii) <input type="checkbox"/> 20.405(a)(1)(iv) <input type="checkbox"/> 20.405(a)(1)(v)			<input type="checkbox"/> 20.405(c) <input type="checkbox"/> 50.36(c)(1) <input type="checkbox"/> 50.36(c)(2) <input checked="" type="checkbox"/> 50.73(a)(2)(i) <input type="checkbox"/> 50.73(a)(2)(ii) <input type="checkbox"/> 50.73(a)(2)(iii)			<input type="checkbox"/> 50.73(a)(2)(iv) <input type="checkbox"/> 50.73(a)(2)(v) <input type="checkbox"/> 50.73(a)(2)(vii) <input type="checkbox"/> 50.73(a)(2)(viii)(A) <input type="checkbox"/> 50.73(a)(2)(viii)(B) <input type="checkbox"/> 50.73(a)(2)(x)			<input type="checkbox"/> 73.71(b) <input type="checkbox"/> 73.71(c) <input type="checkbox"/> OTHER <i>(Specify in Abstract below and in Text, NRC Form 366)</i>	
LICENSEE CONTACT FOR THIS LER (12)													
NAME								TELEPHONE NUMBER					
John C. Aldrich, Maintenance Manager NMP1								(315) 349-4182					
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		
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single space typewritten lines) (16)

On May 16, 1995, with the Nine Mile Point Unit 1 (NMP1) reactor at approximately 100 percent rated thermal power, it was discovered that two Instrument and Control (I&C) surveillance procedures had not been performed in compliance with the frequency specified in Technical Specification Surveillance Requirements (TSSR). Further investigation revealed a third procedure that was also not performed in compliance with the frequency in the TSSR. The three procedures are required by TSSR 4.6.11 to be performed "during each major refueling outage," but had instead been performed during normal operation or during a maintenance outage rather than during Refueling Outage 12 (RFO12) (2/20/93 - 4/13/93). The affected procedures are: N1-ISP-201-018, "High Range Gamma Radiation System," N1-ISP-201-046, "Torus Temperature Monitoring System Calibration," and N1-ISP-036-014, "Inadequate Core Cooling and Reactor Core Level Indication Instrument Calibration." As a result of the corrective actions described in the original submittal of this LER, an additional instance of this problem was identified on June 13, 1996, involving I&C procedure N1-ISP-083-001, "Drywell Liquid Waste Flow Meters." Although TSSR 4.2.5.b.1 requires this action each refueling outage, the action was performed quarterly, during operation, and not during refueling outages 12 and 13.

The root cause of this event is cognitive personnel error by individuals involved in the maintenance surveillance program. Technical Specification surveillance frequency requirements were misinterpreted and I&C surveillances were removed from the refueling outage workscope. The three surveillances were performed in 1995 during RFO13. The surveillance of the drywell liquid waste flow meters was performed quarterly, but not during refueling outages 12 and 13. The Preventive Maintenance/Surveillance Test (PM/ST) database and affected I&C procedures will be corrected to specify a frequency of "during each major refueling outage." In addition, the PM/ST database will be reviewed for similar misinterpretations. This LER will be reviewed with appropriate station personnel.



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 30.0 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 (150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)				PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Nine Mile Point Unit 1	05000220	95	-03	-01	02 OF 05	

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

I. DESCRIPTION OF EVENT

On May 16, 1995, with the Nine Mile Point Unit 1 (NMP1) reactor at approximately 100 percent rated thermal power, a self-assessment of the maintenance surveillance program discovered that two Instrument and Control (I&C) surveillance procedures had not been performed in compliance with the frequency specified in Technical Specification Surveillance Requirements (TSSR). Further investigation revealed a third procedure that was also not performed in compliance with the frequency in the TSSR. The three procedures are required by TSSR 4.6.11 to be performed "during each major refueling outage," but had instead been performed during normal operation or during a maintenance outage rather than during RFO12 (2/20/93 - 4/13/93). The affected procedures are: N1-ISP-201-018, "High Range Gamma Radiation System," N1-ISP-201-046, "Torus Temperature Monitoring System Calibration," and N1-ISP-036-014, "Inadequate Core Cooling and Reactor Core Level Indication Instrument Calibration."

On June 13, 1996, as a result of corrective actions associated with the original submittal of LER 95-03, NMP1 discovered that an additional I&C surveillance procedure had not been performed in compliance with the frequency specified in the Technical Specifications. Specifically, Surveillance Requirement 4.2.5.b.1 is to be performed "once each refueling outage," but had instead been performed quarterly during normal operation rather than during RFO12 and RFO13. The affected procedure is N1-ISP-083-001, "Drywell Liquid Waste Flow Meters." The Technical Specification phrasing in this instance was slightly different than for the originally discovered deficiencies, however, the result was still a requirement to perform the surveillance during a refueling outage. The review which identified this deficiency considered any wording which might tie a surveillance to a refueling condition in order to assure they were properly scheduled.

II. CAUSE OF EVENT

The root cause of this event is cognitive personnel error by individuals involved with the maintenance surveillance program. Around 1988, a misinterpretation occurred causing the TSSR performance frequency of "during each major refueling outage" to be considered equivalent to the more common TSSR performance frequency of "once each refueling cycle." This misinterpretation gained acceptance among maintenance personnel and was incorporated into:

- I&C surveillance procedures which used a frequency of "every 24 months" or a similar statement rather than clearly reflecting the TSSR of "during each refueling outage."
- Preventive Maintenance/Surveillance Test (PM/ST) database, which then used a frequency of 24 months ($\pm 25\%$) as the period for performance.

The list of workscope documents for RFO12 was first compiled in August 1991. During the initial workscope review through the final workscope freeze in October 1992, N1-ISP-201-018 and N1-ISP-201-046



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II. CAUSE OF EVENT (Cont'd.)

were removed from the outage workscope. The decision to remove the surveillances was based upon the procedure frequency, PM/ST database, and the ability to conduct the procedures during operation. Since these procedures can physically be performed during operation, the surveillances were removed from the RFO12 workscope.

Similarly, a major portion of N1-ISP-036-014 was performed prior to RFO12 during power operation. This procedure remained in the outage workscope; however, only the portions that were inaccessible during operation (drywell) were performed during RFO12. The entire surveillance was not performed during RFO12.

The cause of the improper surveillance associated with the "Drywell Liquid Waste Flow Meters," is the same as the previously identified problems, specifically a misinterpretation of the TSSR performance frequency of "once each refueling outage," resulted in the requirement being considered to be equivalent to the more common TSSR performance frequency of "once each refueling cycle."

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 surveillance tests for the drywell high range gamma radiation monitor, torus temperature monitoring system, and the reactor core level indication instrument were not performed in compliance with the condition required by the Technical Specification Surveillance Requirement, i.e., "during each major refueling outage," for RF012.

The drywell high range gamma radiation monitor and the torus temperature monitoring system surveillances were performed during the plant maintenance outage in 1992 and again during plant operation in 1994. These instruments are required by Technical Specifications to be operable during the power operating condition, and thus were not required to be operable during the maintenance outage of 1992. When the surveillances were performed in 1994, one instrument channel was always functionally operable while the other channel was being tested. The period of inoperability of the channel being tested was within the Technical Specification action statement requirements for that instrument.

A major portion of the reactor core level indication instrument surveillance was performed during plant operation in 1993. When the surveillance was being performed in 1993, one instrument channel was always functionally operable while the other channel was being tested. The period of inoperability of the channel being tested was within the Technical Specification action statement requirements for that instrument. The



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TEXT CONTINUATIONESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION
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RECORDS AND REPORTS MANAGEMENT BRANCH (P-330), U.S. NUCLEAR REGULATORY
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(3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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III. ANALYSIS OF EVENT (Cont'd.)

balance of the surveillance was completed during RFO12 when the instruments were not required to be operable.

The Drywell Liquid Waste Flow Meters are required by Technical Specifications to be operable during power operating conditions. The required surveillance was performed quarterly, but not during refueling outages 12 and 13. When the quarterly surveillances were performed, one instrument channel was always functionally operable while the other channel was being tested. The period of inoperability of the channel being tested was within the Technical Specification action statement requirements for that instrument.

Based on the above, performing these surveillance tests at times other than during RFO12 or RFO13 had no adverse safety consequences. The surveillance tests were satisfactorily performed and the instruments were maintained operable on a frequency that matched that of major refueling outages, even though it did not coincide with the refuel outage. Therefore, the health and safety of the general public and plant personnel were not affected.

IV. CORRECTIVE ACTIONS

The following corrective actions have been or will be taken:

1. The three surveillances missed during RFO12 were verified to have been performed during RFO13 and RFO11.
2. The PM/ST database will be changed to specify a correct frequency for surveillances required to be performed during a refueling outage.
3. Affected I&C procedures will be revised to accurately state the frequency required by Technical Specifications.
4. The content and subject of this LER will be reviewed with appropriate station personnel to ensure proper interpretation of Technical Specifications.
5. A review of the PM/ST database has been conducted for other conditional frequencies that might involve similar misinterpretations, such as "once each refueling outage" and "during each refueling outage."

All corrective actions have been completed as of the submission of Supplement 1 to LER 95-03.



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V. ADDITIONAL INFORMATION

- A. Failed components: none.
- B. Previous similar events: LER 86-029, "Failure to Perform Testing within Required Interval" describes an event where the Technical Specification required surveillance on the torus temperature monitoring system was inadvertently deleted from a surveillance test list. The corrective actions from this LER would not have prevented the current event because the surveillance test scheduling process has changed considerably since LER 86-029.

NMP1 has reported a number of other LERs involving operation or conditions prohibited by the plant's Technical Specifications. The descriptions and causes of those LERs are different than this event; therefore, their corrective actions would not have prevented this event.

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

COMPONENT	IEEE 803 EUS FUNCTION	IEEE 805 SYSTEM ID
Drywell high range gamma radiation monitor	RI	NH
Torus temperature monitoring system	TI	NH
Reactor core level indication instrument	LT	SB

