

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9612090253      DOC. DATE: 96/12/02      NOTARIZED: NO      DOCKET #  
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha      05000410  
 AUTH. NAME      AUTHOR AFFILIATION  
 DEAN, R.      Niagara Mohawk Power Corp.  
 CONWAY, J.T.      Niagara Mohawk Power Corp.  
 RECIPIENT NAME      RECIPIENT AFFILIATION

SUBJECT: LER 96-012-00: on 961030, TS violation involving missed augmented inspections. Caused by inadequate changes management. Evaluation will be performed for discrepancies identified in ISI program plan. W/961202 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

December 2, 1996  
NMP2L 1675

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

RE: LER 96-12  
Docket No. 50-410

Gentlemen:

In accordance with 10CFR50.73(a)(2)(i)(B), we are submitting LER 96-12, "Violation Involving Missed Augmented Inspections Caused by Inadequate Change Management."

Very truly yours,

John T. Conway  
Plant Manager - NMP2

JTC/AFZ/kap  
Enclosure

xc: Mr. H. J. Miller, Regional Administrator  
Mr. B. S. Norris, Senior Resident Inspector

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PDR ADOCK 05000410  
S PDR

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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 2	DOCKET NUMBER (2) 5 0 0 0 4 1 0	PAGE (3) 1 OF 4
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TITLE (4)  
Technical Specification Violation Involving Missed Augmented Inspections 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)
10	30	96	96	12	00	12	02	96	N/A	0 5 0 0 0
									N/A	0 5 0 0 0

OPERATING MODE (9) **5** THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

POWER LEVEL (10) <b>0</b>	<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(e) <input type="checkbox"/> 50.36(e)(1) <input type="checkbox"/> 50.36(e)(2) <input checked="" type="checkbox"/> 50.73(a)(2)(f) <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 <small>(Specify in Abstract below and in Text, NRC Form 366A)</small>
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LICENSEE CONTACT FOR THIS LER (12)

NAME Mr. Raymond Dean, Unit 2 Engineering Manager	TELEPHONE NUMBER 315-349-4240
--	----------------------------------

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
<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input type="checkbox"/> NO		12	20	96

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

On October 30, 1996, with Nine Mile Point Unit 2 (NMP2) shutdown in a refueling outage, NMP2 management determined that the plant was not in compliance with Technical Specification (TS) 4.0.5.f, which requires Inservice Inspection (ISI) of piping identified using the staff positions in Generic Letter 88-01. Specifically, 16 welds in the Reactor Water Cleanup System had not been examined at the required frequency.

The apparent cause of this violation was inadequate change management in that the welds requiring augmented inspection for Intergranular Stress Corrosion Cracking (IGSCC) were not properly identified in the Inservice Inspection program. A formal root cause evaluation is being performed, and this report will be supplemented to provide the results of the evaluation, including any additional non-conformances and corrective actions identified.

Corrective actions included: Completion of required weld examinations and updating the ISI Program Plan.



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)	DOCKET NUMBER (2)	LER NUMBER (6)				PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Nine Mile Point Unit 2	05000410	96	- 12	- 00	02 OF 04	

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

**I. DESCRIPTION OF EVENT**

On October 30, 1996, with Nine Mile Point Unit 2 (NMP2) shutdown in a refueling outage, NMP2 management determined that the plant was not in compliance with Technical Specification (TS) 4.0.5.f, which requires Inservice Inspection (ISI) of piping identified using the staff positions in Generic Letter 88-01. Specifically, 16 welds in the Reactor Water Cleanup System had not been examined at the required frequency.

As a result of a similar previous event at Nine Mile Point Unit 1 (NMP1), a Quality Assurance (QA) surveillance of the NMP2 augmented inspection program was conducted. The surveillance determined that 16 welds in the Reactor Water Cleanup System, which should have been included in the ISI program in accordance with the Staff positions in Generic Letter 88-01, had not been examined at the required frequency. These welds should have been subjected to augmented inspection at least every other refueling outage starting with refueling outage two. Four of these welds were examined during refueling outage four (the last previous refueling outage), but the remaining 12 welds had not been previously examined.

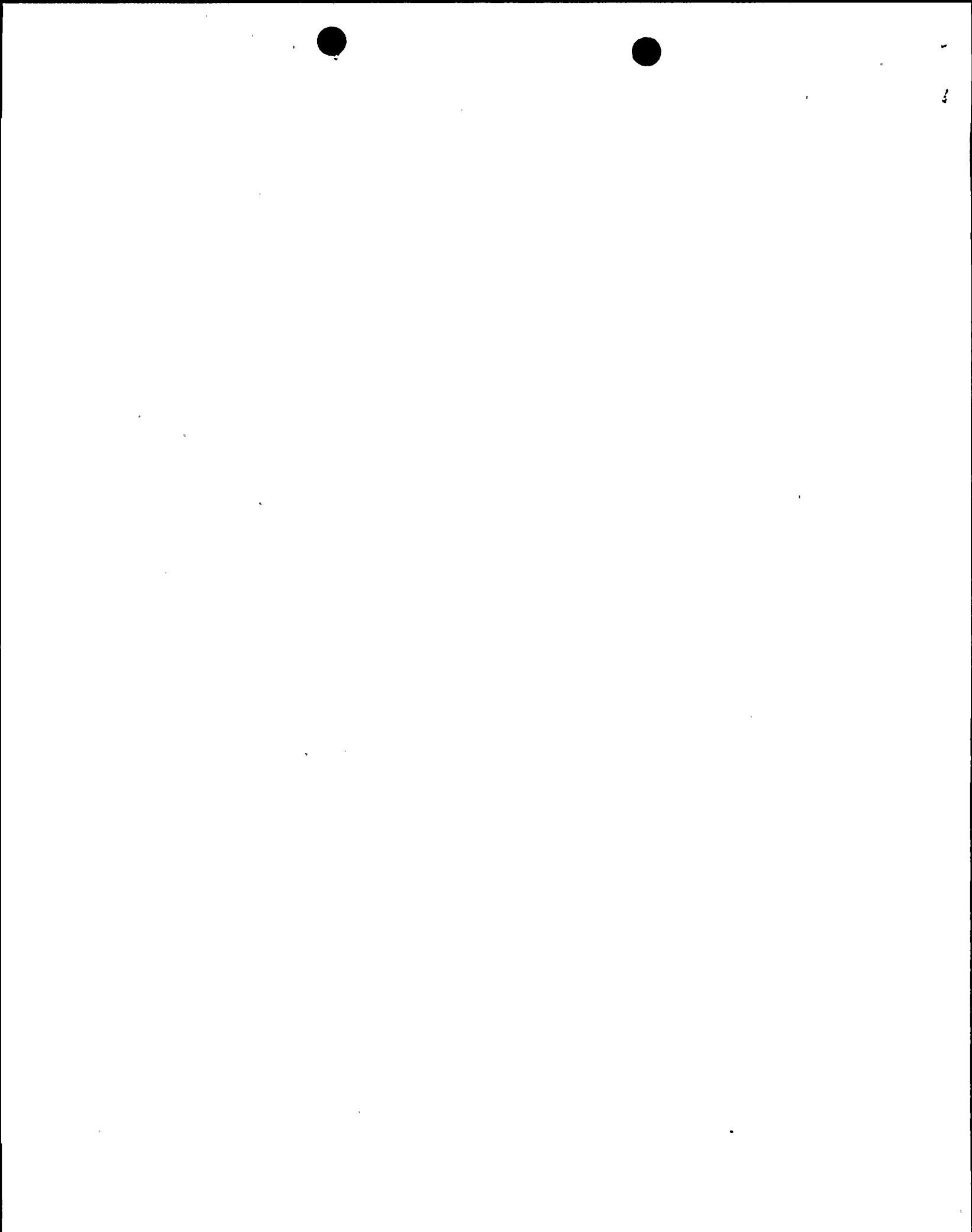
In a series of correspondence between July 1988 and February 1992, Niagara Mohawk provided information to the NRC regarding plans for examination of welds for Intergranular Stress Corrosion Cracking (IGSCC) in response to Generic Letter 88-01. In a February 13, 1992 letter to the NRC (NMP2L 1339), Niagara Mohawk indicated that it concurred with the NRC's position regarding these 16 welds and committed to include them in the ISI program as category D welds requiring augmented examination at least every other refueling outage. The QA surveillance of the ISI program determined that these 16 welds were still classified as Category A rather than Category D welds.

An inspection was performed of the twelve welds, which had not yet been examined, prior to startup from the most recent refueling outage.

**II. CAUSE OF EVENT**

The Niagara Mohawk responses to Generic Letter 88-01 identified welds in the Reactor Water Cleanup System which should have been volumetrically examined every two fuel cycles. In the February 13, 1992 letter to the NRC, Niagara Mohawk committed to change the category of 16 welds from A to D. This change was not made, and as a result, augmented examinations of these 16 welds were not performed at the required frequency.

At this time, a formal root cause evaluation of this deficiency, and the deficiencies identified in the NMP1 Licensee Event Report (LER) 96-08, is being performed. This LER will be supplemented to provide the results of the evaluation, including any additional corrective actions identified.





LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATIONESTIMATED 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-330), 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)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
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Nine Mile Point Unit 2	05000410	96	- 12	- 00	03 OF 04

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

**III. ANALYSIS OF EVENT**

This event is considered reportable under 10CFR50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

Although the plant had operated without performing the required augmented inspections of these welds, the ISI requirements of TS 4.0.5.a were satisfied throughout the period of this violation. The weld examinations performed during this period did not identify any reportable or rejectable indications in the Reactor Water Cleanup System. Furthermore, the 12 welds not inspected during a previous refueling outage were examined prior to restart from the most recent outage, and there were no reportable or rejectable indications. Therefore, the Reactor Water Cleanup System remained fully capable of meeting its design basis throughout the period of this violation.

Based on the analysis performed to date, this event had no adverse affect on any other safety system, nor the operators' ability to maintain safe reactor plant conditions. The Technical Specification violation did not adversely affect the health and safety of the general public or plant personnel.

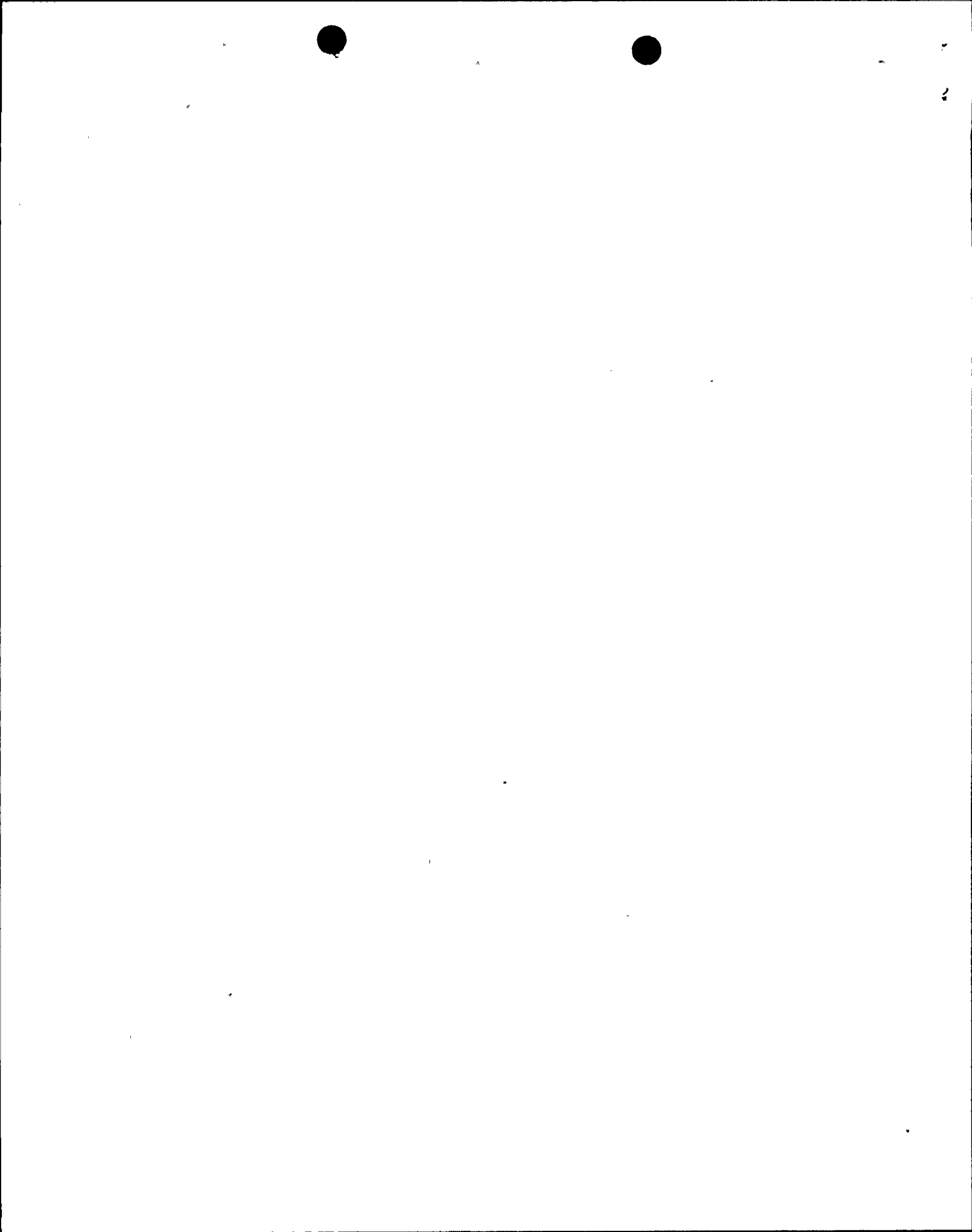
**IV. CORRECTIVE ACTIONS**

The following corrective actions were identified:

1. Prior to startup from the latest refueling outage, volumetric inspections were performed on the 12 welds in the Reactor Water Cleanup System which were not previously examined.
2. A root cause evaluation will be performed for the discrepancies identified in the ISI Program Plan. This LER will be supplemented to provide the results of the evaluation including any additional corrective actions identified. Niagara Mohawk will identify specific actions required to address the inadequate change management associated with the augmented inspections. Completion Date: 12/20/96.
3. The ISI Program Plan will be corrected to indicate that the 16 welds discussed in this LER are Category D. Completion Date: 4/5/97.

**V. ADDITIONAL INFORMATION**

- A. Failed components: none.
- B. Previous similar events: none.



LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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V. **ADDITIONAL INFORMATION** (Cont'd.)

C. Identification of components referred to in this LER:

COMPONENT	IEEE 803 FUNCTION	IEEE 805 SYSTEM ID
Reactor Water Cleanup System	NA	CE



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