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 AUTH. NAME: CONWAY, J.T. AUTHOR AFFILIATION: Niagara Mohawk Power Corp.
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SUBJECT: Special rept: on 961122, air temp instruments declared inoperable. Caused by failure to verify consistency & accuracy of values in NMP2 TS & NMP2 USAR for meteorological monitoring instrumentation. Completed field survey of temps.

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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 9, 1996
NMP2L 1677

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 3.3.7.3 ACTION Statement "a", we are submitting the following Special Report concerning the inoperability of specific Meteorological Monitoring Instrumentation.

Event Description

Nine Mile Point Nuclear Station Quality Assurance Audit #96022 identified discrepancies between the NMP2 Technical Specifications and NMP2 USAR specified meteorological air temperature monitoring elevations. The NMP2 Technical Specifications Table 3.3.7.3-1 indicates that air temperature and wind speed and direction monitoring instruments are located at elevations 30 ft and 200 ft. The NMP2 USAR Sections 2.3.3.2, 2.3.4.3.2, and 2.3.5.3.1 indicate that the air temperature monitoring instruments are located at elevations 27 ft and 200 ft. The instruments are mounted on horizontal structural members, which are attached to a vertical tower at nominal elevations of 30 ft and 200 ft. A field survey was performed on December 3, 1996, to more accurately determine the elevations of the instruments. The actual locations of the air temperature monitoring instruments are 26.8 ft and 194.8 ft, respectively. The actual locations of the wind speed and direction monitoring instruments are 30.9 ft and 199.4 ft, respectively.

At 1230 hours on November 22, 1996, Deviation Event Report (DER) 2-96-3158 was processed to document the deviation and the air temperature instruments were declared inoperable. At 1609 hours on December 5, 1996, Engineering determined that the wind speed and direction instruments were also inoperable. NMP2 was operating at power with the reactor mode switch in Run (Mode 1) during this period.

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It has been determined that the difference between the as built configuration and the discrepant documents mentioned has no adverse impact on the function of the instruments or the validity of the information provided by the instruments. Delta temperature indication to determine atmospheric stability class has always been based on the actual height difference. The actual locations of the meteorological instruments provide the necessary data to estimate the doses to the members of the public from normal and accidental releases of radioactive materials to the atmosphere. Therefore, the meteorological instrumentation is functional, and the meteorological data reported remains accurate.

Cause of Event

The apparent cause of the event was the failure to properly verify the consistency and accuracy of values referenced in the NMP2 Technical Specifications and the NMP2 USAR for meteorological monitoring instrumentation located on the Nine Mile Point Nuclear Station Meteorological Tower. This discrepancy has existed since the initial issuance of the USAR and the Technical Specifications. A root cause determination will be provided in Licensee Event Report (LER) 96-14 to be submitted by December 22, 1996.

Corrective Actions

The following corrective actions have been completed.

1. Nine Mile Point Nuclear Station DER 2-96-3158 was processed to document this event, to determine operability of the instrumentation, to determine a root cause for the deviation, and to identify and track implementation of appropriate corrective actions.
2. A field survey of the actual elevations of the lower and upper air temperature as well as the wind speed and direction monitoring instruments was completed.
3. NMP2 Engineering completed a formal Operability Determination and concluded that the meteorological instrumentation was functional. However, because the instrument elevations are not in verbatim compliance with the Technical Specification values, the instruments are considered inoperable.

The following future corrective actions are planned.

1. Niagara Mohawk will submit LER 96-14 addressing this issue and the root cause determination. (December 22, 1996)

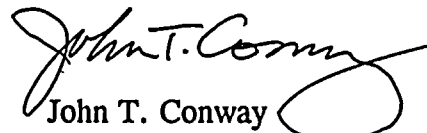


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2. Niagara Mohawk will submit a Technical Specification amendment request to the NRC which will relocate and correct the meteorological specification in order to be consistent with the Improved Standard Technical Specifications. *(April 30, 1997)*
3. NMP2 Engineering will evaluate the use of the current instrument locations as a back-up until the Technical Specification amendment is approved. *(December 22, 1996)*

Very truly yours,


John T. Conway
Plant Manager - NMP2

JTC/KLL/lmc

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

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