

CATEGORY 1

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ACCESSION NBR: 9701020006 DOC. DATE: 96/12/23 NOTARIZED: NO DOCKET #
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
 AUTH. NAME AUTHOR AFFILIATION
 GALLETTA, T.A. Niagara Mohawk Power Corp.
 CONWAY, J.T. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 96-014-00: on 961122, failed to submit special rept re inoperable meteorological instrumentation. Caused by personnel error. Completed field survey of elevations of upper & lower temps & declared instrumentation functional. W/961223 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 23, 1996
NMP2L 1680


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

RE: LER 96-14
Docket No. 50-410

Gentlemen:

In accordance with 10CFR50.73 (a)(2)(i)(B), we are submitting LER 96-14, "Failure to Submit a Special Report Concerning Inoperable Meteorological Instrumentation."

Very truly yours,


John T. Conway
Plant Manager - NMP2

JTC/KLL/lmc
Enclosure

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

Sina

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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 (0150-0104), 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 5
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TITLE (4) Failure to Submit a Special Report Concerning Inoperable Meteorological Instrumentation

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)	
11	22	96	96	14	00	12	23	96	N/A	0 5 0 0 0	
									N/A	0 5 0 0 0	

OPERATING MODE (9) 1 THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

POWER LEVEL (10) 100%	<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 <small>(Specify in Abstract below and in Text, NRC Form 366A)</small>
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LICENSEE CONTACT FOR THIS LER (12)

NAME Mr. Thomas A. Galletta, Site Meteorologist	TELEPHONE NUMBER (315) 349-2715
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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 type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO				

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

At 1230 hours on November 22, 1996, Nine Mile Point Deviation Event Report (DER) 2-96-3158 documented discrepancies between the Nine Mile Point Unit 2 (NMP2) Technical Specifications and the NMP2 USAR specified meteorological air temperature monitoring locations. The air temperature monitoring instruments were declared inoperable. At 1609 hours on December 5, 1996, NMP2 Engineering determined that the wind speed and direction monitoring instruments were also inoperable. NMP2 was operating at power with the reactor mode switch in RUN (Mode 1) during this period. NMP2 Technical Specifications require the submittal of a Special Report whenever a meteorological instrument monitoring channel has been inoperable for more than 7 days. The subject monitoring instruments are now considered to have been inoperable since the issuance of the NMP2 Technical Specifications. However, no Special Report was submitted until December 9, 1996.

The 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 instrumentation located on the Nine Mile Point Meteorological Tower.

Corrective actions included performing a field survey to determine the actual locations of the meteorological instruments. An Engineering Operability Determination was performed which concluded that the air temperature and wind monitoring instruments were functional but inoperable due to non-compliance with the NMP2 Technical Specifications and USAR.



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENT 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	14	00	02 OF 05

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

I. DESCRIPTION OF EVENT

Nine Mile Point Nuclear Station Quality Assurance Audit #96022 identified discrepancies between the NMP2 Technical Specifications and the NMP2 USAR specified meteorological air temperature monitoring elevations. The NMP2 Technical Specifications Table 3.3.7.3-1 indicates that air temperature and wind indicator (wind speed and direction) monitoring instruments are located at elevations 30 ft. and 200 ft. The NMP2 USAR Section 2.3.3.2.1 indicates that air temperature monitoring instruments are located at 27 ft. and 200 ft., and that wind indicator instruments are located at elevations 30 ft. and 200 ft.

At 1230 hours on November 22, 1996, Deviation Event Report (DER) 2-96-3158 was processed to document the deviation. The air temperature monitoring instruments were declared inoperable. A field survey was performed on December 3, 1996, which determined that the actual locations of the instruments did not conform to the values listed in the Technical Specifications or the USAR. At 1609 hours on December 5, 1996, NMP2 Engineering determined that the wind speed and direction instruments also were not in compliance with the NMP2 Technical Specifications or the USAR requiring those instruments to also be considered inoperable. NMP2 was operating at power with the reactor mode switch in RUN (Mode 1) during this period. Although the air temperature, wind speed, and wind direction instruments were considered inoperable, they remained functional.

The meteorological monitoring instruments are mounted on horizontal structural members, which are attached to a vertical tower at nominal elevations of 30 ft. and 200 ft. According to the results of the December 3, 1996 field survey, the actual locations of the air temperature monitoring instruments are 26.8 ft. and 194.8 ft., respectively. The actual locations of the wind indicator monitoring instruments are 30.9 ft. and 199.4 ft., respectively.

NMP2 Technical Specifications 3.3.7.3 ACTION Statement "a" requires that NMP2 submit a Special Report to the NRC whenever one or more Meteorological Instrument Monitoring channels have been inoperable for more than 7 days. The subject meteorological monitoring instruments are considered to have been inoperable since the initial issuance of the NMP2 Technical Specifications. A Special Report should have been submitted reporting the inoperability of the air temperature monitoring and wind monitoring instruments due to discrepancies between the field elevations and the elevations listed in the NMP2 Technical Specifications. No Special Report concerning this event was submitted prior to December 9, 1996.

II. CAUSE OF EVENT

Although the exact Root Cause of this event cannot be determined, the apparent cause was personnel error. The cause of the errors in the elevations contained within the NMP2 current USAR was most likely due to the direct transfer of nominal instrument elevations formerly listed in the Nine Mile Point Unit 1 (NMP1) Technical Specifications into the NMP2 FSAR. When the meteorological instrument elevations from the

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II. CAUSE OF EVENT (Cont'd)

NMP1 Technical Specifications were incorporated into the NMP2 FSAR, the elevations were not identified as "nominal" as stated in the NMP1 Technical Specifications.

The most likely cause of the inaccurate elevations in the NMP2 Technical Specifications was either that the values from the Standard Technical Specifications were directly transferred into the NMP2 Technical Specifications (without the NMP2 site-specific values being entered), or that the NMP1 Technical Specifications values were transferred incorrectly. Therefore, the elevations listed for the air temperature monitoring and wind indicator instruments were not based on the actual meteorological tower locations. For this reason the current NMP2 Technical Specifications elevations for the subject meteorological monitoring instruments are considered to be incorrect.

A contributing cause associated with this event is that the actual meteorological instrument elevations were not indicated on any configuration control document or drawing for reference purposes when the instruments were installed in 1983.

The air temperature monitoring and wind indicator instruments remain functional. They remain inoperable, however, because the actual elevations of the instruments are not in compliance with the NMP2 Technical Specifications or USAR listed elevations of the instruments. These discrepancies have existed since the initial issuance of the NMP2 USAR and the NMP2 Technical Specifications.

III. ANALYSIS OF EVENT

The event, "Failure to Submit a Special Report Concerning Inoperable Meteorological Instrumentation," is reportable in accordance with 10CFR50.73(a)(2)(i)(B), "Any Operation or Condition Prohibited by the Plant's Technical Specifications."

The site emergency plan identifies the instrument locations as approximately 30 ft. and approximately 200 ft. However, the delta temperature scaling factor used to determine the stability class has always been based on the actual height difference. Engineering reviews of historical data determined that the instrument height deviation has no adverse impact on the air temperature monitoring and wind indicator instruments. From their actual locations, the instruments still accurately provide the necessary data to estimate the doses to the public from normal and accident releases of radioactive materials to the atmosphere.

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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 (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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III. ANALYSIS OF EVENT (Cont'd)

Therefore, although the actual locations of the instruments are not in compliance with the Technical Specifications, the meteorological instruments remain functional. No changes to the on-site meteorological program are required.

This event had no safety significance for NMP2. There were no adverse affects on the health and safety of the public or on the safety of plant personnel.

IV. CORRECTIVE ACTIONS

Immediate corrective actions:

1. DER 2-96-3158 was processed to document this event to determine the root cause for the deviation, and to identify and track the appropriate corrective actions.
2. A field survey of the actual elevations of the upper and lower 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 instruments are functional. Because the instrumentation elevations are not in compliance with the NMP2 Technical Specification values, the instruments were considered inoperable.
4. A Special Report was processed.

Future corrective actions:

1. NMP2 Engineering has determined that the use of the air temperature monitoring and wind monitoring instruments as backup or substitute instruments in accordance with the Site Emergency Plan is acceptable. A formal safety evaluation will be performed to justify this approach prior to actual use of the instruments as backups or substitutes. (April 30, 1997)



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IV. CORRECTIVE ACTIONS (Cont'd)

2. A Technical Specifications amendment request will be prepared for submission to the NRC which will relocate the meteorological specification in order to be consistent with the Improved Standard Technical Specifications (April 30, 1997).
3. Since the exact root cause of this event cannot be determined, the following additional corrective action will be taken by NMP2 Engineering. A review of the NMP2 Technical Specifications and the corresponding NMP2 USAR information for similar listings or tables of equipment or instrument locations will be performed to verify the locations agree and are consistent with associated design documents (February 28, 1997).
4. The NMP2 ITS Program will be reviewed to ensure appropriate controls are in place to direct, when required, the incorporation of plant-specific values (derived from appropriate design documents) into the new specifications (January 31, 1997).
5. NMP2 Engineering will process an LDCR (Licensing Document Change Request) to revise the NMP2 USAR to correct the meteorological instrumentation information (April 30, 1997).

V. ADDITIONAL INFORMATION

- A. Failed components: none.
- B. Previous similar events: none.
- C. Identification of components referred to in this LER:

COMPONENT	IEEE 803 FUNCTION	IEEE 805 SYSTEM ID
Air Temperature Indicator	TI	IS
Wind Speed Indicator	N/A	IS
Wind Direction Indicator	N/A	IS

