

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9701270119      DOC. DATE: 97/01/17      NOTARIZED: NO      DOCKET #  
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moho      05000410  
 AUTH. NAME      AUTHOR AFFILIATION  
 DEAN, R.      Niagara Mohawk Power Corp.  
 CONWAY, J.T.      Niagara Mohawk Power Corp.  
 RECIPIENT NAME      RECIPIENT AFFILIATION

SUBJECT: LER 96-012-01: on 961030, missed augmented inspections of welds. Caused by inadequate change management. Completed required weld examinations, will update ISI Program Plan & will review & revise ISI Program mgt methods. W/970117 ltr.

DISTRIBUTION CODE: IE22T      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5  
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NIAGARA MOHAWK

GENERATION  
BUSINESS GROUP

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

January 17, 1997  
NMP2L 1683

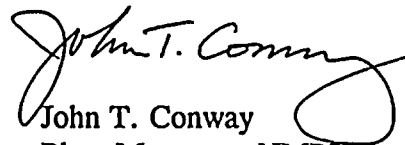
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: LER 96-12, Supplement 1  
Docket No. 50-410

Gentlemen:

In accordance with 10CFR50.73(a)(2)(i)(B), we are submitting LER 96-12, Supplement 1, "Technical Specification 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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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-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) Nine Mile Point Unit 2	DOCKET NUMBER (2) 5000410	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	01	01	17	97	N/A	05000	
									N/A	05000	

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) 0	<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 365A)</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)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	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 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 cause of this violation was inadequate change management in that pertinent information was not transmitted to the Inservice Inspection (ISI) Program Manager. As a result, welds requiring augmented inspection for Intergranular Stress Corrosion Cracking (IGSCC) were not properly identified in the Inservice Inspection Program.

Corrective actions identified include: Completion of required weld examinations, updating the ISI Program Plan, and reviewing and revising, as appropriate, ISI Program management methods and oversight.



1  
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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	01	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 had included 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**

A root cause investigation was performed utilizing Nuclear Interface Procedure NIP-ECA-01, "Deviation/Event Report." The cause of the event was determined to be inadequate change management in that pertinent information was not transmitted to the Inservice Inspection (ISI) Program Manager. As a result, welds requiring augmented inspection for Intergranular Stress Corrosion Cracking (IGSCC) were not properly identified in the Inservice Inspection Program.

The Niagara Mohawk responses to Generic Letter 88-01 identified welds in the Reactor Water Cleanup System which should have been volumetrically examined at least every other refueling outage. February 13, 1992 letter to the NRC, Niagara Mohawk indicated that the ISI program had already been revised to change





LICENSEE EVENT REPORT (LER)  
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RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY  
COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT  
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Nine Mile Point Unit 2	05000410	96	12	01	03 OF 04	

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

**II. CAUSE OF EVENT (Cont'd)**

the category of 16 welds from A to D. This letter was incorrect in that the changes had not yet been incorporated, because the pertinent information was not transmitted to the ISI Program Manager. Contributing to this event were inadequate managerial methods and oversight. As a result, during the period in which this deficiency developed, the ISI Program Manager was not directly involved in resolving NRC comments regarding IGSCC program requirements, and the February 13, 1992 letter was not reviewed by the ISI Program Manager prior to submittal.

**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."

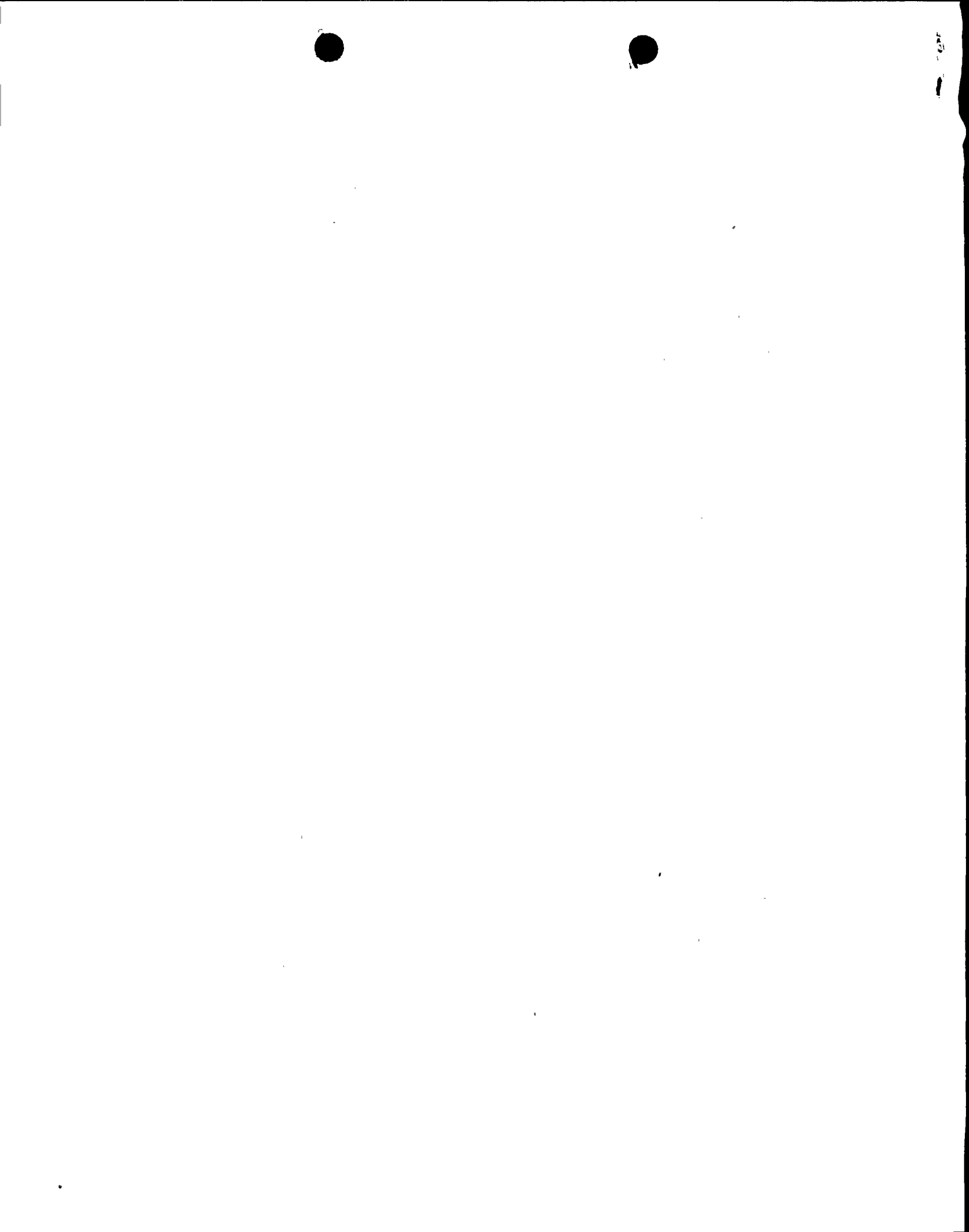
Although the plant had operated without performing the required augmented inspections of these welds, the ISI requirements of TS 4.0.5.a were satisfied throughout the period of this violation. The weld examinations performed during this period did not identify any reportable or rejectable indications 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, 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 was performed for the discrepancies identified in the ISI Program Plan. This LER supplement provides the results of the evaluation.
3. The ISI Program Plan will be corrected to indicate that the 16 welds discussed in this LER are Category D. The NRC will be notified by letter when this has been completed. This notification will also serve to correct the docket for the error in the February 13, 1992 letter. Completion Date: April 5, 1997.



LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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**IV. CORRECTIVE ACTIONS (Cont'd)**

- 4. The current ISI Program management methods and level of oversight will be evaluated relative to task requirements, incorporating the lessons learned from this event. Appropriate changes to procedures will be made, as required, and any applicable lessons learned will be shared with appropriate Branch Managers. Completion date: May 15, 1997.
- 5. In addition, since the period when the causes of this event occurred, the correspondence review process has been enhanced to clarify the responsibilities and requirements for identifying correspondence reviewers and regulatory commitments.

**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
Reactor Water Cleanup System	NA	CE

