

October 24, 1997

Mr. B. Ralph Sylvia
Executive Vice President
and Chief Nuclear Officer
Niagara Mohawk Power Corporation
Nuclear Learning Center
450 Lake Road
Oswego, NY 13126

SUBJECT: NRC INSPECTION REPORT NOS. 50-220/97-80 AND 50-410/97-80
AND NOTICE OF VIOLATION

Dear Mr. Sylvia:

This letter refers to the NRC inspection conducted by Mr. Gordon Hunegs and others from this office from August 4 - 8, 1997, and from August 18 - 22, 1997, at the Nine Mile Point Nuclear Station, Units 1 and 2. The purpose of this inspection was to determine whether licensee activities were conducted safely, and in accordance with the NRC requirements. The inspection focus was on the effectiveness of your problem identification and resolution processes.

Overall, the team found that the administrative control procedures for the corrective action program were adequate; however, some weaknesses were noted with the implementation of the corrective action program. While the Nine Mile Point staff was generally effective in identifying problems, shortcomings were identified with the quality of root cause determinations, corrective actions and documentation. Root causes and corrective actions were not always fully developed and therefore problems in some areas have continued. Several weaknesses in the programs to identify and address human performance issues were also apparent. The team also noted that there have been several recent initiatives to improve the station performance in these areas.

Based on the results of this inspection, a violation of NRC requirements occurred. The violation concerned administration control of the justification for the extension of deviation/event reports. You are required to respond to this letter and should follow the instructions specified in the enclosed Notice of Violation (Notice) when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. Your response may reference previous docketed correspondence if the correspondence adequately addresses the required response. Please include as a part of your response those corrective actions you intend to take to understand the broader implications of these violations. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

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III. Engineering

E4 Engineering Staff Knowledge and Performance

E4.1 250-VDC Battery Load Calculation

a. Inspection Scope (37551)

The licensee identified that the present 250-VDC loading calculation did not model the worst case load profile for the battery. The licensee initiated PIF D1997-06167 to document the concern. The inspectors reviewed the licensee's PIF, the licensee's initial operability determination (OPD 97-87), and prior history and docketed information with respect to the 250-VDC battery.

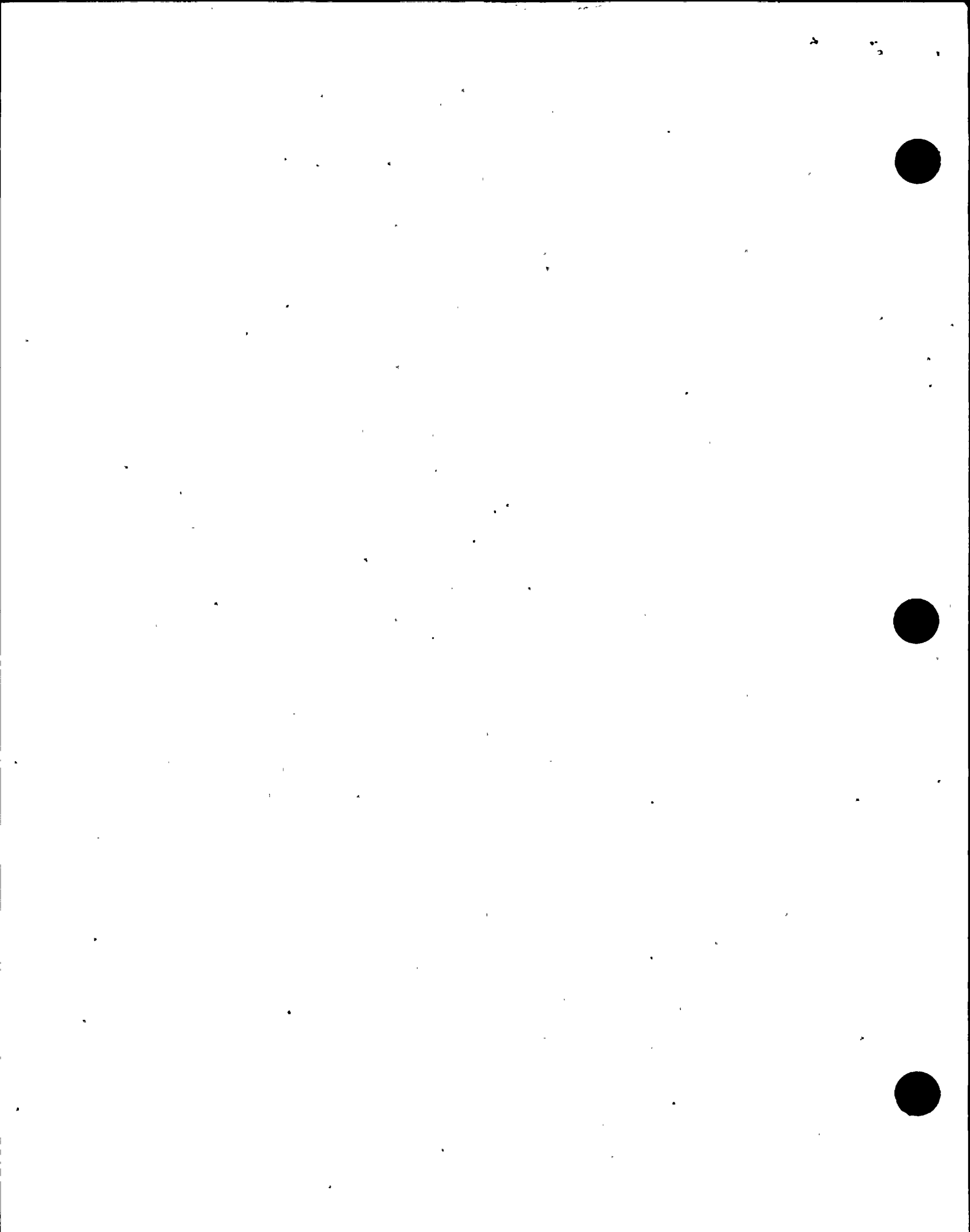
b. Observations and Findings

In response to inspectors' questions at another Commonwealth Edison station, the licensee reviewed the battery calculation and identified that the loading calculation (PMED 898230-01, Revision 11) for the 250 Vdc battery did not model the worst case load profile. The worst case load profile existed when a unit battery was aligned to the swing charger and a loss of the unit's diesel generator occurred concurrent with a loss-of-coolant accident. This scenario, which added an additional 75 ampere load on the battery for a four-hour duration, was not verified by the last Technical Specification battery load profile surveillance test. The licensee's operability determination concluded that the station batteries were operable so long as they were aligned to their respective unit chargers. The licensee provided guidance to the operators to declare the battery inoperable and enter the appropriate Technical Specification LCO action statement if the battery was aligned to the swing charger. The inspectors reviewed the licensee's operability determination and did not identify any substantive concerns with the licensee's conclusions.

The NRC previously documented concerns with the licensee's 250 Vdc battery sizing calculations in inspection report 50-237/96-201; 50-249/96-201 (Independent Safety Inspection (ISI) of Dresden Nuclear Power Station, dated December 24, 1996). The ISI report stated, "The licensee initiated a PIF to document the discovery of the overlap of loads for certain MOVs and the need to revise Calculation PMED-898230-01." The ISI report also documented that "The licensee stated that the calculation will be formally revised to incorporate these issues." Pending further NRC review of the Updated Final Safety Analysis Report, the licensee's response to the ISI report, and the revised battery calculation, this is an Unresolved Item (URI 50-237/97015-06(DRP); 50-249/97013-06(DRP)).

c. Conclusions

The licensee missed prior opportunities to identify and resolve the 250 Vdc battery loading issue. Engineering personnel did not adequately review the battery calculation when responding to previously identified technical concerns.



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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures, and your response will be placed in the NRC Public Document Room.

Your cooperation with us is appreciated.

Sincerely,

Original Signed by:

Charles W. Hehl, Director
Division of Reactor Projects

Docket Nos. 50-220, 50-410
License Nos. DPR-63, NPF-69

Enclosures:

1. Notice of Violation
2. NRC Inspection Report Nos. 50-220/97-80 and 50-410/97-80

cc w/encls:

R. Abbott, Vice President & General Manager - Nuclear
C. Terry, Vice President- Safety Assessment and Support
J. Conway, Vice President - Nuclear Engineering
K. Dahlberg, Vice President - Nuclear Operations
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