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 FACIL: 50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Powe 05000220
 AUTH. NAME: ABBOTT, R.B. AUTHOR AFFILIATION: Niagara Mohawk Power Corp.
 RECIP. NAME: RECIPIENT AFFILIATION

SUBJECT: LER 97-001-00: on 970930, noted that previous plant shutdown was in violation of TS. Caused by inadequate review of procedures. Operations procedure N1-OP-43A has been revised. W/971030 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

October 30, 1997
NMP1L 1262

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

RE: LER 97-11
Docket No. 50-220

Gentlemen:

In accordance with 10CFR50.73 (a)(2)(i)(B), we are submitting LER 97-011, "Previous Plant Shutdown in Violation of Technical Specifications."

Very truly yours,

Richard B. Abbott
Plant Manager - NMP1

RBA/GJG/lmc
Enclosure

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

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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 1

DOCKET NUMBER (2)

05000220

PAGE (3)

1 OF 4

TITLE (4)

Previous Plant Shutdown in Violation of Technical Specifications

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)	
09	30	97	97	011	00	10	30	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(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(e)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(e)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	<small>(Specify in Abstract below and in Text, NRC Form 366A)</small>
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

Richard E. Abbott - Acting Manager Operations NMP1

TELEPHONE NUMBER

(315) 349-2608

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)

YES (If yes, complete EXPECTED SUBMISSION DATE)

NO

EXPECTED SUBMISSION DATE (15)

MONTH

DAY

YEAR

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

On September 30, 1997, Niagara Mohawk Power Corporation (NMPC) determined that on September 3, 1992, Nine Mile Point Unit 1 (NMP1) had placed the Mode Switch in REFUEL at temperatures in excess of 212°F, and on previous occasions were in violation of the Technical Specification (TS) Definition 1.1c, Refuel.

For the period from initial operation of NMP1 through September 3, 1992, personnel inappropriately determined that placing the mode switch in REFUEL with all rods inserted to Position 00 was more appropriate than leaving the mode switch in STARTUP during the period of cool down to less than 212°F, and it avoided introducing an unnecessary scram from the SHUTDOWN position.

The procedure was corrected prior to performing a normal shutdown on September 15, 1997.



4
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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)				PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Nine Mile Point Unit 1	05000220	97	- 11	- 00	02 OF 04	

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

I. DESCRIPTION OF EVENT

In preparation for a planned normal reactor shutdown on September 15, 1997, the operations and reactor engineering staff reviewed and trained on the appropriate operating procedures. On September 12, 1997, Niagara Mohawk Power Corporation (NMPC) determined that Nine Mile Point Unit 1 (NMP1) operating procedures N1-OP-43A, "Reactivity Control," and N1-OP-43, "Startup, Shutdown and Normal Operation," did not contain the required prerequisites to place the reactor mode switch in REFUEL during shutdown by manual control rod insertion in order to meet TS Definition 1.1c Refuel requirements. NMPC's practice since 1993 has been to shut down NMP1 by performing a "soft" scram from approximately 20 percent power, therefore this inadequacy in the procedure was not identified until the station planned for a shutdown using normal control rod insertions. Having identified the inadequacy, a historical review was conducted and the staff determined on September 30, 1997, that on September 3, 1992, and on previous occasions, NMP1 had placed the Mode Switch in REFUEL at temperatures in excess of 212°F in violation of TS Definition 1.1c, Refuel.

Since June 9, 1988, NMP1 TS 1.1c only allowed the mode switch to be in REFUEL at temperatures less than 212°F, or for 1) vessel hydro, 2) scram time testing, or 3) scram recovery operations. Contrary to this requirement, the NMP1 mode switch was placed in REFUEL on September 3, 1992, while the temperature was 377°F. Prior to June 9, 1988, TS 1.1c did not permit the Mode Switch to be in REFUEL at all above 212°F. However, the mode switch was placed in REFUEL above 212°F on several occasions.

NMPC has reviewed the previous revisions to operating procedures N1-OP-43, "Startup, Shutdown and Normal Operation," and N1-OP-43A, "Reactivity Control," and determined that neither of these procedures contained sufficient direction to ensure compliance with TS Definition 1.1c Refuel.

II. CAUSE OF EVENT

For the period from initial operation of NMP1 through September 3, 1992, personnel inappropriately determined that placing the mode switch in REFUEL with all rods inserted to Position 00 was more appropriate than leaving the mode switch in STARTUP during the period of cool down to less than 212°F, and it avoided introducing an unnecessary scram from the SHUTDOWN position. This configuration, while not in compliance with the TS definition of Shutdown Condition - Hot with respect to mode switch position, was not viewed as a TS violation.

The implementation of TS Amendment 99 on June 9, 1988, was an opportunity to identify and resolve this procedure inadequacy. The implementation of the TS amendment focused on changing the procedures which implemented the allowed exemptions to the definition of Shutdown Condition - Hot for scram time testing during vessel hydrostatic testing, but the shutdown procedure was not reviewed for impact. Subsequently, there were several revisions to the procedure which should have identified this deficiency as well. The cause of these missed opportunities has been determined to be inadequate technical review of these procedures.

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

III. ANALYSIS OF EVENT

This event is reportable in accordance with 10CFR50.73 (a)(2)(i)(B), "any operation or condition prohibited by the plant's Technical Specifications."

Placing the mode switch in REFUEL following a scram while above 212°F is allowed, and was analyzed and approved by TS Amendment 99. Placing the mode switch in REFUEL enables the refuel one rod permit light which is used for "ALL RODS IN" verification. There are no additional safety consequences of placing the mode switch in REFUEL following manual rod insertion even though it is not allowed by TSs. The one rod out refueling interlock is enforced in both situations (i.e., post scram and manual rod insertion) and along with sufficient shutdown margin which is required in TS 3.1.1a assures that the reactor will remain subcritical in all conditions of core exposure and temperature with the strongest control rod fully withdrawn. Therefore, this event posed no threat to the public or NMP1 personnel.

IV. CORRECTIVE ACTIONS

1. Operations procedure N1-OP-43A has been revised (N1-OP-43 has been superseded).
2. This event will be discussed in operator requalification training by November 15, 1997.
3. Operations will verify that procedures which implement reactor mode changes are in compliance with TS Section 1.0 Definitions of Reactor Operating Conditions by November 30, 1997.

Previously implemented actions to address instances of inadequate technical procedure preparation and review, are also applicable to this event. Specifically, a corrective action described in Nine Mile Point Unit 2 (NMP2) LER 94-003:

An inadequate technical review has been recognized in the past as being one of the major reasons for violating specific requirements. NMPC has upgraded specific programs whose purpose is not only to ensure that adequate procedures are written, but also to ensure the review of these procedures is carried out in a manner that should eliminate events such as these. These include, but are not limited to, the following procedurally controlled programs:

- NIP-SEV-01, Applicability Reviews and Safety Evaluations
- NIP-PRO-03, Preparation and Review of Technical Procedures
- PWM-PRO-0105, Technical Procedure Verification and Validation



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

V. ADDITIONAL INFORMATION

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

