

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9712090169 DOC. DATE: 97/12/01 NOTARIZED: NO DOCKET #
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
 AUTH. NAME AUTHOR AFFILIATION
 DEAN, R. J. Niagara Mohawk Power Corp.
 DAHLBERG, K. A. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 97-013-00: on 971029, NMP determined that prior to 1992 switchgear did not seismically qualify w/breakers out. Caused by inadequate translation of requirements. Procedures were developed to assure accordance w/requirements. W/971201 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD1-1 PD	1 1	HOOD, D	1 1
INTERNAL:	ACRS	1 1	AEOD/SPD/RAB	2 2
	AEOD/SPD/RRAB	1 1	<u>FILE CENTER</u>	1 1
	NRR/DE/ECGB	1 1	NRR/DE/EELB	1 1
	NRR/DE/EMEB	1 1	NRR/DRCH/HHFB	1 1
	NRR/DRCH/HICB	1 1	NRR/DRCH/HOLB	1 1
	NRR/DRCH/HQMB	1 1	NRR/DRPM/PECB	1 1
	NRR/DSSA/SPLB	1 1	NRR/DSSA/SRXB	1 1
	RES/DET/EIB	1 1	RGN1 FILE 01	1 1
EXTERNAL:	L ST LOBBY WARD	1 1	LITCO BRYCE, J H	1 1
	NOAC POORE, W.	1 1	NOAC QUEENER, DS	1 1
	NRC PDR	1 1	NUDOCS FULL TXT	1 1

NOTE TO ALL "RIDS" RECIPIENTS:
 PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

FULL TEXT CONVERSION REQUIRED
 TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL 25

A04

C
A
T
E
G
O
R
Y

1

D
O
C
U
M
E
N
T



NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

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

December 1, 1997
NMP1L 1271

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Docket No. 50-410
LER 97-13

Gentlemen:

In accordance with 10CFR50.73(a)(2)(ii)(A) and 10CFR50.73(a)(2)(i)(B), we are submitting LER 97-13, "Prior to 1992, Emergency Switchgear Not Seismically Qualified With Breakers Racked Out."

Very truly yours,

Kim A. Dahlberg
Plant Manager - NMP2

KAD/GJG/lmc
Attachment

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

9712090169 971201
PDR ADOCK 05000410
S PDR

05000410





LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)

Nine Mile Point Unit 2

DOCKET NUMBER (2)

05000410

PAGE (3)

1 OF 4

TITLE (4)

Prior to 1992, Emergency Switchgear Not Seismically Qualified With Breakers Racked Out

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	29	97	97	013	00	12	01	97	N/A	05000	
									N/A	05000	

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) 95	<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(c)(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(c)(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)	<i>(Specify in Abstract below and in Text, NRC Form 366A)</i>
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input checked="" 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

R. J. Dean - Engineering Manager Unit 2

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)

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 October 29, 1997, Niagara Mohawk Power Corporation (NMPC) determined that prior to April 30, 1992, Nine Mile Point Unit 2 (NMP2) had racked out breakers from a 4160 volt switchgear in a manner which did not meet the seismic qualification requirements. This was discovered on October 17, 1997, during a review of NRC Information Notice (IN) 97-53, when an operations engineer discovered that other licensees had reported similar conditions, but could not find a report for NMP2. After a thorough search of records, it was determined that the event should have been reported previously.

The cause of the improper racking out of switchgear breakers has been determined to be inadequate translation of engineering requirements into plant procedures. The cause of the failure to report the event in 1992 cannot be determined.

Procedures were developed in 1992 to assure the emergency switchgear breakers are manipulated in accordance with seismic qualification requirements.



**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 (4)				PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Nine Mile Point Unit 2	05000410	97	- 13	- 00	02 OF 04	

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

I. DESCRIPTION OF EVENT

On October 29, 1997, Niagara Mohawk Power Corporation (NMPC) determined that prior to April 30, 1992, Nine Mile Point Unit 2 (NMP2) was determined to have operated in an unanalyzed condition, for seismic qualification requirements. This was discovered during a review of NRC Information Notice (IN) 97-53, Circuit Breakers Left Racked Out in Non-seismically Qualified Positions. An operations engineer identified that 12 licensees had reported that plants had operated in an unanalyzed condition when switchgear breakers were racked out during operation. He was aware of a similar deficiency which had been identified for NMP2, but an LER was not found.

Deviation/Event Report (DER) 2-92-Q-1144, initiated on March 27, 1992 identified that emergency switchgear and emergency unit substation breakers had been racked out during previous operation. At the time of the DER, NMP2 was shutdown for refueling. On May 1, 1992, Nuclear Engineering dispositioned the DER by stating that the emergency switchgear are only seismically qualified with breakers racked in. Therefore, switchgear with breakers in the racked out position were not operable. Immediate corrective action was taken which provided direction to maintenance personnel that breakers needed to be fully racked in or completely removed to maintain seismic qualification.

When DER 2-92-Q-1144 was reviewed by the Station Shift Supervisor (SSS) on April 1, 1992, Operability Determination and Reportability Determination were both checked not applicable. In 1992, DERs were also reviewed by Site Regulatory Compliance (SRC) personnel, after initiation but prior to disposition. The SRC engineer who reviewed this DER disagreed with the operability determination not being applicable and indicated that an operability determination was required. When Nuclear Engineering dispositioned the DER on April 30, 1992, the box titled "Reportability/Operability" was checked and an annotation made that the Plant Manager was notified, as required by procedure. Therefore, whether the intent was to advise the Plant Manager of an operability concern, reportability concern or both cannot be determined.

II. CAUSE OF EVENT

The cause of improper racking out of switchgear breakers has been determined to be inadequate translation of the requirements of the seismic qualification program into operations and maintenance procedures. Nuclear Engineering personnel were aware of the seismic qualification requirements, but were not aware that operations and maintenance procedures did not enforce those requirements.

The cause of the failure to report this event in 1992 cannot be determined. The personnel involved have been interviewed and do not recollect the specifics of reportability. However, a contributor to not reporting in 1992 is that the process was not clear relative to whether dispositioners were advising the Plant Manager with regard to an operability concern or a reportability concern.



11
12

**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	97	- 13	- 00	03 OF 04

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)(ii), "any event or condition that resulted in the condition of the nuclear power plant, including its principle safety barriers, being seriously degraded; or that resulted in the nuclear power plant being: (A) in an unanalyzed condition that significantly compromised plant safety." NMP2 is required to maintain seismic qualification of equipment, and with emergency switchgear breakers racked out and not properly restrained, seismic qualification was not maintained. This event is also reportable in accordance with 10CFR50.73 (a)(2)(i)(B), "any operation or condition prohibited by the plant's Technical Specifications." NMP2 TS 3.8.3.1 Action a.1 requires initiation of shutdown within 8 hours if the Division I or Division II AC distribution system is inoperable. It is most probable that, prior to April 1992, breakers had been racked out in excess of eight (8) hours.

The past practice of racking out emergency switchgear breakers was to rack out breakers on one safety division at a time. Therefore, the other division was always available to mitigate the consequences of an accident. In addition, a seismic event is a low probability event. Therefore, this operation did not pose a threat to the public or plant personnel.

IV. CORRECTIVE ACTIONS

1. On June 12, 1992, Nuclear Engineering provided a matrix entitled "Breaker Configuration Restrictions."
2. In October 1992, Operations and maintenance procedures were revised consistent with the matrix described in 1 above.
3. On January 1, 1994, NIP-ECA-01 "Deviation/Event Report" was revised to require returning DERs to the Station Shift Supervisor (SSS) if the initial operability/reportability determination was impacted during disposition.
4. Since January 1994, there have been several additional enhancements to NIP-ECA-01 to continually improve NMPC's Corrective Action Program.
5. Nuclear Division personnel have been trained in the revision to NIP-ECA-01 including the requirement to return DERs to the SSS, if operability/reportability determinations are impacted.
6. NMPC Quality Assurance performs a semi-annual Corrective Action Audit. On a periodic basis, the audit has included reviewing DER reporting in accordance with 10CFR50.72 and 10CFR50.73 on a sample basis. To date, no additional DERs have been identified which should have been reported.



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	97	- 13	- 00	04 OF 04

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:

COMPONENT	IEEE 803 FUNCTION	IEEE 805 SYSTEM ID
Emergency Switchgear	SWGR	EB
AC Circuit Breakers	52	EB

