

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9804030399 DOC.DATE: 98/03/24 NOTARIZED: NO DOCKET #
FACIL:50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
AUTH.NAME AUTHOR AFFILIATION
MUELLER, J.H. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in insp rept 50-410/97-12.
Corrective actions:RSCS operability test procedure revised
to add steps to bypass RWM while performing appropriate
steps of procedure & to return RWM to svc at end of test.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 4
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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	2 2	AEOD/SPD/RAB	1 1
	AEOD/TTC	1 1	DEDRO	1 1
	FILE CENTER	1 1	NRR/DRCH/HHFB	1 1
	NRR/DRPM/PECB	1 1	NRR/DRPM/PERB	1 1
	NUDOCS-ABSTRACT	1 1	OE DIR	1 1
	OGC/HDS3	1 1	RGN1 FILE 01	1 1
INTERNAL:	LITCO BRYCE, J H	1 1	NOAC	1 1
	NRC PDR	1 1	NUDOCS FULLTEXT	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

TOTAL NUMBER OF COPIES REQUIRED: LTTR 19 ENCL 19

C
A
T
E
G
O
R
Y
1
D
O
C
U
M
E
N
T



Niagara Mohawk


John H. Mueller
Senior Vice President and
Chief Nuclear Officer

Office: (315) 349-7907
Fax: (315) 349-1321
e-mail: muellerj@nimo.com

March 24, 1998
NMP2L 1764

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

RE: Nine Mile Point Unit 2
 Docket No. 50-410
 NPF-69

*Subject: Reply to Notice of Violation as Contained in NRC Inspection Report
 50-220/97-12 and 50-410/97-12*

Gentlemen:

Niagara Mohawk Power Corporation's reply to the subject Notice of Violation is enclosed in the Attachment to this letter. Much of the information provided with respect to this violation is contained in Nine Mile Point Unit 2 Licensee Event Report 97-14, which was submitted on December 10, 1997. We do not dispute this violation.

Very truly yours,



John H. Mueller
Chief Nuclear Officer

JHM/GJG/lmc
Attachment

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
 Mr. S. S. Bajwa, Director, Project Directorate I-1, NRR
 Mr. B. S. Norris, Senior Resident Inspector
 Mr. D. S. Hood, Senior Project Manager, NRR
 Records Management

9804030399 980324
PDR ADOCK 05000410
Q PDR



ATTACHMENT

**NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT UNIT 2
DOCKET NO. 50-410
NPF-69**

**"REPLY TO NOTICE OF VIOLATION," AS CONTAINED IN
INSPECTION REPORT 50-220/97-12 and 50-410/97-12**

A. VIOLATION 50-410/97-12-05

Nine Mile Point Unit 2 Technical Specification Surveillance Requirement 4.1.4.2.b.1 requires the operability of the rod sequence control system (RSCS) be demonstrated by attempting to select and move an inhibited control rod after withdrawal of the first in-sequence control rod for each reactor startup.

Unit 2 surveillance test procedure N2-OSP-RMC-@004, "Rod Sequence Control System Operability Test," Revision 1, was developed to demonstrate that the RSCS was operable in accordance with the Technical Specifications.

Contrary to the above, from 1990 until November 10, 1997, it was determined that the RSCS had not been properly tested, because, following a modification to the rod worth minimizer (RWM), surveillance test procedure N2-OSP-RMC-@004 was not changed to bypass the RWM during the test and the RSCS rod block could not be verified with the RWM in service.

This is a Severity Level IV violation (Supplement I).

I. THE REASON FOR THE VIOLATION

At Nine Mile Point Unit 2 (NMP2), prescribed control rod withdrawal and insertion sequences are enforced automatically by two systems, the Rod Sequence Control System (RSCS) and the Rod Worth Minimizer (RWM). Operability of the RSCS is demonstrated in part during startup by fully withdrawing the first control rod in the sequence and then selecting a control rod that is not in-sequence and attempting to withdraw the rod. Observing that rod motion is blocked satisfies the test. An indicating light on the RSCS confirms that a rod block signal is being generated from the RSCS. This signal is hard-wired directly into the reactor manual control system. The test is performed similarly for plant shutdowns. Under these conditions, the RWM also enforces a similar rod block.

The RWM was modified in August 1990 and accepted by Operations in December 1990. This modification involved replacing the existing RWM with an improved design General Electric Nuclear Measurement Analysis and Control (NUMAC) RWM. The NUMAC RWM enforces



a rod block similar to the RSCS under the same test conditions, whereas the previous RWM did not. The modification documentation did not identify this difference, nor did it identify the impact to the RSCS test procedure.

The indication provided by the RWM of rod motion blocks under the test conditions is not annunciated and is displayed only on the RWM console by the words "insert withdraw" when these blocks are activated. Based upon interviews with Operations personnel, it is believed that because this is not an overt alarm and is not addressed in the RSCS test procedure, this condition was not recognized each time the test was performed since the NUMAC RWM was installed in 1990.

The root cause of this event has been determined to be personnel error in that change related documents were not correctly revised. During the process of a major procedure upgrade project, the RSCS procedure was revised in January 1991 for the purpose of updating and reformatting. It was reviewed by the system engineer involved with the RWM modification at that time. The procedure required few technical changes; however, the engineer provided these written comments, "It might be a good idea to bypass the RWM prior to performing this procedure: blocks could be caused by the RWM." There were no changes to the procedure as a result of the system engineers comments. The failure to adequately evaluate the reviewer's comments resulted in this violation. The reason for the comments not being incorporated cannot be definitively determined. The procedure writer is no longer employed at NMPC. The engineer who made the comment does not recollect receiving feedback from the procedure writer.

II. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The RSCS operability test procedure has been revised to add steps to bypass the RWM while performing the appropriate steps of the procedure and to return the RWM to service at the completion of the test. The operability test procedure for the RWM was reviewed to ensure that a similar deviation did not exist. No discrepancies were noted.

NMP2 has reviewed operations procedures associated with the Neutron Monitoring System, the Reactor Manual Control System and the Reactor Protection System since those systems have unique redundancies and rod blocks similar to that of the RSCS and the RWM. No additional discrepancies were found.



III. ACTIONS THAT WILL BE TAKEN TO PREVENT RECURRENCE

In April 1991, after the RSCS procedure was changed, Administrative Procedure AP-2.1, Procedure Preparation, Review and Issue, was developed which required that comments be resolved. AP-2.1 was subsequently replaced by Nuclear Interface Procedure (NIP)-PRO-03, Preparation and Review of Technical Procedures, which has similar comment resolution requirements. Therefore, no additional actions are necessary.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on November 10, 1997 when RSCS was successfully tested and declared operable.

