CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9805280082 DOC.DATE: 98/05/18 NOTARIZED: NO DOCKET #
FACIL:50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
AUTH.NAME AUTHOR AFFILIATION
PISANO,L.E. Niagara Mohawk Power Corp.
DAHLBERG,K.A. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-009-00:on 980417,missed battery TS SR was noted. Caused by inappropriate interpretation of TS allowances. Obtained enforcement discretion to allow plant operation until refueling outages.W/980518 ltr.

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TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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	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
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CATEGORY 1 DOCUMENT

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A04

NIAGARA MOHAWK
GENERATION
BUSINESS GROUP

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

May 18, 1998
NMP2L 1783

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

RE: Docket No. 50-410
LER 98-09

Gentlemen:

In accordance with 10CFR50.73 (a)(2)(i)(B), we are submitting LER 98-09, "Missed Battery Technical Specification Surveillance Requirement Due to Inappropriate Interpretation."

Very truly yours,

KADahlberg

Kim A. Dahlberg
Plant Manager - Unit 2

KAD/TWP/kap
Attachment

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

IE22

NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104
EXPIRES:

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)	DOCKET NUMBER (2)	PAGE (3)
Nine Mile Point Unit 2	05000410	1 OF 4

TITLE (4)
Missed Battery Technical Specification Surveillance Requirement Due to Inappropriate Interpretation

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)
04	17	98	98		009		00	05	18	98	N/A	05000
											N/A	05000

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: *(Check one or more of the following)* (11)
	1	

POWER LEVEL (10)				
091	☐ 20.2201(b)	☐ 20.2203(a)(2)(v)	☒ 50.73(a)(2)(i)	☐ 50.73(a)(2)(viii)
	☐ 20.2203(a)(1)	☐ 20.2203(a)(3)(i)	☐ 50.73(a)(2)(ii)	☐ 50.73(a)(2)(x)
	☐ 20.2203(a)(2)(i)	☐ 20.2203(a)(3)(ii)	☐ 50.73(a)(2)(iii)	☐ 73.71
	☐ 20.2203(a)(2)(ii)	☐ 20.2203(a)(4)	☐ 50.73(a)(2)(iv)	☐ OTHER *(Specify in Abstract below and in Text, NRC Form 366A)*
	☐ 20.2203(a)(2)(iii)	☐ 50.36(c)(1)	☐ 50.73(a)(2)(v)	
	☐ 20.2203(a)(2)(iv)	☐ 50.36(c)(2)	☐ 50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
L. E. Pisano, Manager Maintenance - Unit 2	(315) 349-2073

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO EPIX		CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
☐ YES *(If yes, complete EXPECTED SUBMISSION DATE)*	☒ NO				

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

On April 17, 1998, Niagara Mohawk Power Corporation (NMPC) determined that Technical Specification Surveillance Requirement (TS SR) 4.8.2.1.d for the Division I 125 Volt Direct Current (VDC) battery had not been met for Nine Mile Point Unit 2 (NMP2) from April, 1995 to the present. In refueling outages 4 and 5, credit was inappropriately taken for the battery performance discharge test in lieu of the battery service test as required by TS SR 4.8.2.1.d.

The cause of this event has been determined to be inappropriate interpretation of the TS allowances for using the battery performance discharge test to satisfy the battery service test.

Corrective actions included obtaining enforcement discretion to allow plant operation until the refueling outage. The battery service test was successfully completed. Surveillance procedures and the Preventive Maintenance/Surveillance Test (PMST) database were revised to clearly state the requirements of TS SR 4.8.2.1.d.

I. DESCRIPTION OF EVENT

On April 17, 1998, Niagara Mohawk Power Corporation (NMPC) determined that Nine Mile Point Unit 2 (NMP2) had not met Technical Specification Surveillance Requirement (TS SR) 4.8.2.1.d for the Division I 125 Volt Direct Current (VDC) battery (2BYS*BAT2A) since April, 1995. TS SR 4.8.2.1.d requires a battery service test or a dummy load test every 18 months. NMPC System Engineers and Electrical Maintenance personnel inappropriately believed that the performance of the battery performance discharge tests, which were performed in refueling outages 4 and 5 (April, 1995 and October, 1996), satisfied the TS requirements for the battery service test. This missed TS SR was discovered by personnel performing reviews for the Improved Technical Specifications (ITS). Enforcement discretion from the requirements of TS SR 4.8.2.1.d was requested and granted by the NRC on April 17, 1998.

During Refueling Outage 3, September 1993, the Division I 125 VDC battery 2BYS*BAT2A was replaced. In order to validate the vendor testing, a capacity test (performance discharge test) was performed prior to installation of the battery. The test indicated a battery capacity of 114 percent.

IEEE-450-1980, section 5.2 states that "A performance test of the battery capacity...should be made within the first 2 years of service." Based upon this recommendation, a second capacity test was performed during refueling outage 4 (April 11, 1995). The capacity test was inappropriately used to satisfy the requirements of TS 4.8.2.1.d in lieu of a service test. The basis for this decision was the statement in TS SR 4.8.2.1.e which says, "During this once every 60 month interval, this performance discharge test may be performed in lieu of the battery service test."

The second capacity test of the battery indicated a capacity of 103.4 percent, which is 10.6 percent less than that measured prior to installation. This reduction resulted in invoking TS 4.8.2.1.f, which requires capacity testing every 18 months when a battery shows signs of degradation. Due to this requirement, the battery was again capacity tested in refueling outage 5 (October 2, 1996). The capacity test was again used to inappropriately satisfy TS 4.8.2.1.d in lieu of the service test.

This deviation was identified as a result of discussions during the review of the Improved Technical Specifications (ITS). The discussion centered around a statement that is in both the Current Technical Specifications (CTS) and the ITS, which says "During this once every 60 month interval, this performance discharge test may be performed in lieu of the battery service test." This statement had been interpreted as ANY TIME a performance discharge test was performed, credit could be taken for the service test. The once per 60 month interval was taken as a description of the capacity test and NOT a restriction on the frequency. The ITS discussion clarified that the TS phrase is written in order to restrict the frequency that the allowance can be taken, that is, ONLY ONCE per the 60 month interval.

II. ROOT CAUSE

The root cause of this missed TS SR has been determined to be inappropriate interpretation of the TS allowances for using the battery performance discharge test to satisfy the battery service test. The personnel involved inappropriately believed TS SR 4.8.2.1.e satisfied TS SR 4.8.2.1.d each time the capacity test was performed, even though credit for this was only allowed once per the 60 month interval.

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."

The 125 VDC Electrical power system consists of three independent Class 1E DC Electrical power subsystems, Division I, Division II, and Division III. Each subsystem consists of a battery, two 100 percent battery chargers, and the associated control equipment and interconnecting cabling. The station DC Electrical power system provides the AC emergency power system with control power and provides both motive and control power to selected safety related equipment. During normal operation, the DC loads are powered from the battery charger with the batteries floating on the system. In the event of a loss of normal power to the battery charger, the DC loads are automatically powered from the batteries. Identical batteries used in the Division II DC System have successfully passed previous service tests. The Division II and Division III batteries were operable.

On March 28, 1998, the offsite 115 KV supply line (Line 5) to the Division I (and Division III) onsite class 1E power distribution system tripped. As a result, the Division I diesel generator automatically started and reenergized the AC bus as required. The Division I Uninterruptible Power Supply (UPS) transferred to battery power and maintained power to the required UPS vital power distribution system. This sequence of events verified that the Division I battery supplied power to the Division I DC equipment as required. This further verified that the Division I battery was capable of adequately providing power to those required critical systems that require emergency power to safely shutdown the plant and maintain it in a safe shutdown condition in conjunction with a loss of offsite power event.

In addition, a service test was successfully performed on the Division I battery during Refueling Outage 6 (RFO6), which confirmed its ability to perform its function. Based on the preceding, this missed TS SR did not pose a threat to the health and safety of the general public or to plant personnel.

IV. CORRECTIVE ACTIONS

1. Enforcement discretion was obtained to allow plant operation until the next Cold Shutdown which was RFO6.

2. NMPC successfully performed a Service Test (N2-ESP-BYS-R681) on the Division I battery during RFO6.

3. The Preventive Maintenance/Surveillance Test (PMST) database has been revised to specify that the performance discharge test can only be performed in lieu of the service test ONCE every 60 months.

4. The Electrical Maintenance surveillance procedures have been revised to clearly state the requirements that the performance discharge test can only be done in lieu of the service test ONCE every 60 months.

5. The System Engineer and the Electrical Maintenance General Supervisor have been coached on the event.

V. ADDITIONAL INFORMATION

A. Failed components: none.

B. Previous similar events:

NMP2 has had a number of instances where procedure preparation or review caused missed or inadequately performed surveillance tests. In accordance with NMPC's Corrective Action Program, a Deviation/Event Report (DER) was initiated to evaluate this trend. A root cause team was assembled to evaluate this overall trend to determine if process problems or other common aspects could be identified. Required corrective actions will be taken as necessary to correct any identified deficiencies in accordance with the corrective action program.

C. Identification of components referred to in this LER:

COMPONENT	IEEE 803 FUNCTION	IEEE 805 SYSTEM ID
125 VDC Battery	BTRY	EJ