

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9806080378 DOC. DATE: 98/05/27 NOTARIZED: NO DOCKET #
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moho 05000410
 AUTH. NAME AUTHOR AFFILIATION
 WARD, K.D. Niagara Mohawk Power Corp.
 DAHLBERG, K.A. Niagara Mohawk Power Corp.
 RECIPIENT NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-011-00: on 980427, missed TS surveillance testing of alternate power supply was determined. Caused by poor work practices. Applicable procedures revised. W/980527 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

May 27, 1998
NMP2L 1786

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

RE: Docket No. 50-410
LER 98-11

Gentlemen:

In accordance with 10CFR50.73 (a)(2)(i)(B), we are submitting LER 98-11, "Missed Technical Specification Surveillance Testing of Alternate Power Supply."

Very truly yours,

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

9806080378 980527
PDR ADOCK 05000410
S PDR

1/1
IL 2



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-330), 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 5

TITLE (4)

Missed Technical Specification Surveillance Testing of Alternate Power Supply

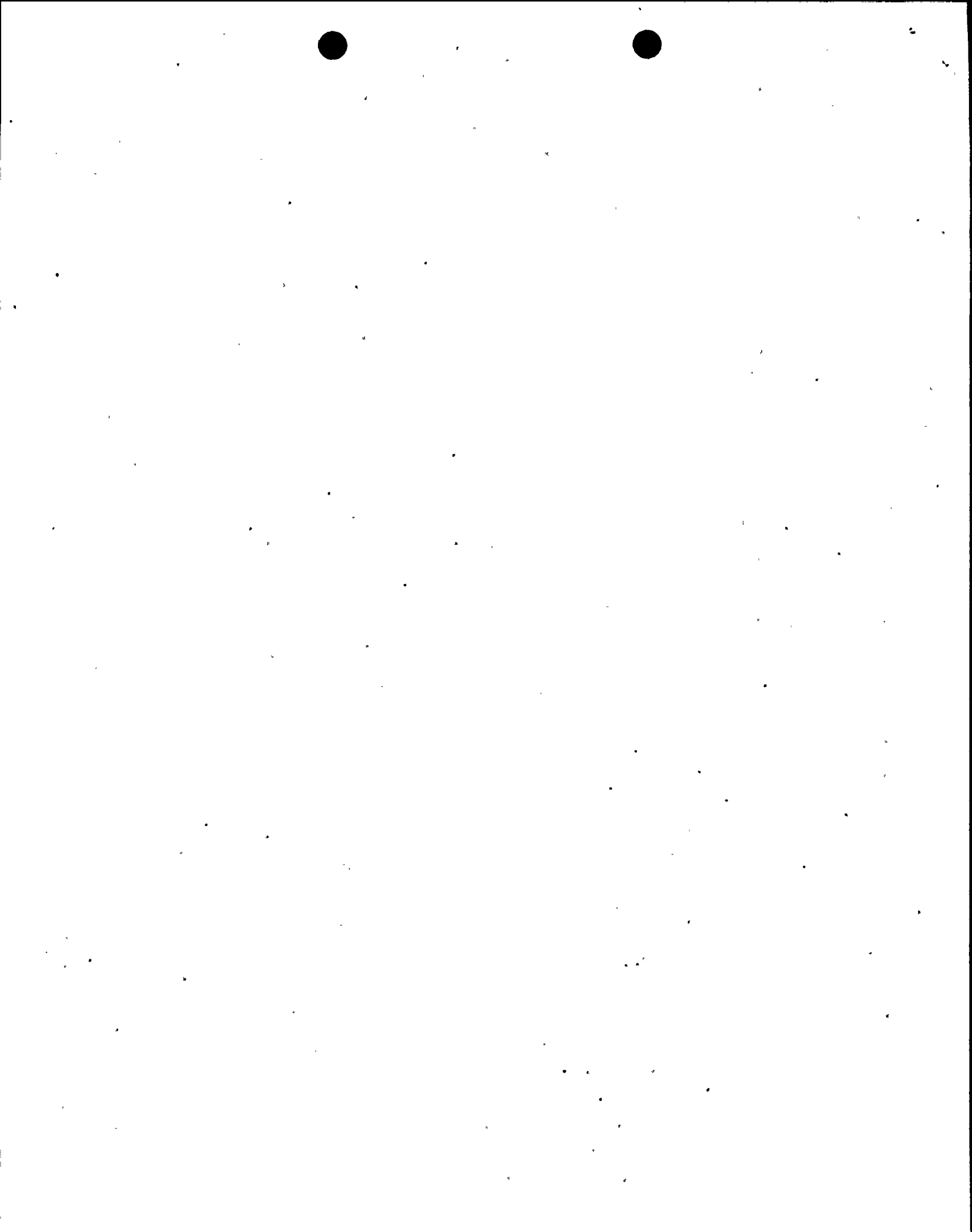
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)	
04	27	98	98	011	00	05	27	98	N/A	05000	
									N/A	05000	
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)								
POWER LEVEL (10) 091			<input type="checkbox"/> 20.2201(b) <input type="checkbox"/> 20.2203(a)(1) <input type="checkbox"/> 20.2203(a)(2)(i) <input type="checkbox"/> 20.2203(a)(2)(ii) <input type="checkbox"/> 20.2203(a)(2)(iii) <input type="checkbox"/> 20.2203(a)(2)(iv)		<input type="checkbox"/> 20.2203(a)(2)(v) <input type="checkbox"/> 20.2203(a)(3)(i) <input type="checkbox"/> 20.2203(a)(3)(ii) <input type="checkbox"/> 20.2203(a)(4) <input type="checkbox"/> 50.36(e)(1) <input type="checkbox"/> 50.36(e)(2)		<input checked="" type="checkbox"/> 50.73(a)(2)(i) <input type="checkbox"/> 50.73(a)(2)(ii) <input type="checkbox"/> 50.73(a)(2)(iii) <input type="checkbox"/> 50.73(a)(2)(iv) <input type="checkbox"/> 50.73(a)(2)(v) <input type="checkbox"/> 50.73(a)(2)(vi)			<input type="checkbox"/> 50.73(a)(2)(viii) <input type="checkbox"/> 50.73(a)(2)(x) <input type="checkbox"/> 73.71 <input type="checkbox"/> OTHER <small>(Specify in Abstract below and in Text, NRC Form 366A)</small>	
LICENSEE CONTACT FOR THIS LER (12)											
NAME						TELEPHONE NUMBER					
K. D. Ward, Technical Support Manager						(315) 349-1043					
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPK	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		
SUPPLEMENTAL REPORT EXPECTED (14)						EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)						<input checked="" type="checkbox"/> NO					

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

On April 27, 1998, Niagara Mohawk Power Corporation (NMPC) determined that the Nine Mile Point Unit 2 (NMP2) surveillance procedures for Division III failed to adequately test the entire circuit. On May 13, 1998, NMP2 determined that similar deficiencies existed for Divisions I and II in that surveillance procedures also failed to adequately test the entire circuit. The missed testing for all three Divisions involved the use of the alternate offsite feeder breaker when supplying the divisional switchgear. These deficiencies were identified during a review of logic circuits as a result of Generic Letter (GL) 96-01. This is a violation of Technical Specification Surveillance Requirements (TS SR) 4.3.3.2 and 4.8.1.1.2, which are required to be performed at least once per 18 months.

The cause of this event has been determined to be poor work practices. The deficiencies should have been identified during initial procedure development. Subsequent reviews also failed to identify the deficiencies.

The applicable procedures were revised. The applicable contacts for Divisions I and III were tested. The Division II contacts will be tested during the ongoing Refueling Outage 6 (RFO6). The GL 96-01 review continues and is scheduled for completion prior to startup from RFO6.



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	98	11	00	02 OF 05

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

I. DESCRIPTION OF EVENT

On April 27, 1998, Niagara Mohawk Power Corporation (NMPC) determined that the Nine Mile Point Unit 2 (NMP2) surveillance procedures for Division III failed to adequately test the entire circuit. On May 13, 1998, NMP2 determined that similar deficiencies existed for Divisions I and II in that surveillance procedures also failed to adequately test the entire circuit. The missed testing for all three Divisions involved the use of the alternate offsite feeder breaker when supplying the divisional switchgear. This is a violation of Technical Specification Surveillance Requirements (TS SR) 4.3.3.2 and 4.8.1.1.2, which are required to be performed at least once per 18 months.

These deficiencies were identified during a review of logic circuits being performed as a result of commitments associated with Generic Letter (GL) 96-01, Testing of Safety-Related Logic Circuits. The normal offsite electrical lineup for the Division I, II, and III switchgear calls for the normal feeder breaker to be closed and the alternate feeder breaker cubicle to be empty (no breaker installed). In each of the surveillance tests described below, the surveillance testing requirements had typically been performed for the normal feeder breaker due to the electrical lineup, but not for the alternate feeder breaker. The surveillance procedures did not specify which offsite feeder breaker was supplying the bus.

- The Logic System Functional Test (LSFT) procedure(s) for testing the Division I, II, and III response to an Emergency Core Cooling System (ECCS) actuation (TS 4.3.3.2).
- The procedure(s) for testing the Division I, II, and III Emergency Diesel Generator (EDG) response to an ECCS actuation signal, while operating the EDG in the Test Mode connected to the bus (TS 4.8.1.1.2.e.11).
- The procedure(s) for testing the Division I and II EDG capability to manually synchronize and transfer loads with offsite power upon restoration of offsite power (TS 4.8.1.1.2.e.10).
- The procedure(s) for testing the Division III Load Shed function during a Loss of Offsite Power (LOOP) (TS 4.8.1.1.2.e.4.b).

The alternate feed for each division provides a backup power source from offsite in the event the normal offsite power supply is not available. This alternate feed is provided via a separate breaker cubicle which does not contain a breaker during normal operation. If this alternate feed is required, the divisional switchgear is provided temporary power by the respective EDG. The normal supply breaker is then racked out and relocated to the alternate feeder breaker cubicle. The EDG and offsite power source are then paralleled, the loads are transferred, and the EDG is secured.



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Nine Mile Point Unit 2	05000410	98	- 11	- 00	03 OF 05	

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

I. DESCRIPTION OF EVENT (Cont'd)

LER 98-07 described a similar deficiency where feeder breaker contacts were not adequately tested in the loss of voltage and degraded voltage circuitry. The closed position contacts for the alternate feeder breaker remained untested due to the plant configuration at the time. Holdout tags were hung as a result of that event to ensure that the appropriate testing was completed prior to the alternate feed being declared operable.

II. CAUSE OF EVENT

The cause of this event has been determined to be poor work practices. The initial procedure writers did not perform an adequate review to ensure that all the appropriate contacts were tested. The writers missed the significance of identifying the specific offsite feeder breakers that were being used for the tests.

During the review of this event, technical inaccuracies were identified in color coded LSFT drawings that are used for the review of procedures involving LSFT requirements. The missed contacts were not color coded to indicate which procedure tested these contacts. This lack of color coding would provide misleading information with respect to the LSFT requirements. NMPC had performed two previous LSFT reviews (in 1989 and 1995) that were independent of the review for GL 96-01. Neither of these previous reviews identified these deficiencies. The drawing inaccuracies may have influenced the results of the LSFT reviews. However, personnel involved in these reviews were knowledgeable of TS SR and LSFT requirements and should have identified these deficiencies.

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."

Loss of voltage or degraded voltage conditions are monitored to ensure adequate capability exists to supply power to start and operate emergency loads. If adequate power is not available from the offsite power sources (normal or alternate feed), the EDGs provide power to the respective switchgear. The emergency loads would then automatically sequence onto the bus. If an ECCS actuation signal occurs when the EDG is running in the Test Mode (i.e., in parallel with offsite power via the normal or alternate feed), the EDG breaker will trip and the EDG will continue to run unloaded. The emergency loads would be powered from offsite power and would automatically sequence onto the bus. When the associated alternate feeder breaker contacts for Divisions I and III were tested, all contacts operated correctly, and therefore, all actions that would have been required would have occurred. It is reasonable to believe that the applicable contacts in Division II will also operate correctly. Since the Division I and III circuitry was demonstrated to be functional and it is expected that the Division II circuitry will be functional, this event had no adverse consequences on the health and safety of the public or plant personnel.



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATIONESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION
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Nine Mile Point Unit 2	05000410	98	- 11	- 00	04 OF 05

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

IV. CORRECTIVE ACTIONS

1. The applicable procedures were revised to incorporate the appropriate testing requirements.
2. The applicable contacts for Divisions I and III were tested during refueling outage six (RFO6). The applicable contacts for Division II will be tested prior to startup from RFO6. Holdout tags will be maintained until testing is performed.
3. The objective of the GL 96-01 review was to ensure that all LSFT components are adequately tested from the sensor through and including the actuated device. The rigor and level of detail of the GL 96-01 review and reviews of other TS requirements have identified missed surveillance testing requirements. The missed TS requirements discussed in this LER were self-identified and demonstrate the acceptability of current work practices. Long-term enhancements and controls for LSFT will be developed based on conclusions drawn from the GL 96-01 review. One determination that has been made is that the color-coded LSFT drawings will be considered historical documentation. The GL 96-01 review is scheduled for completion prior to startup from RFO6.

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.

LERs 98-04 and 98-07 also involved a missed LSFT. The cause of LER 98-04 was poor work practices, which led to an incorrect determination of what component served as the actuated device. LER 98-07 was similar to this LER and also involved poor work practices from previous LSFT reviews. The rigor and level of detail of the GL 96-01 review identified the missed LSFT described in LER 98-07 and the missed surveillance testing described in this LER, and therefore, should prevent further occurrence.



**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		98	11	00	

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

V. ADDITIONAL INFORMATION (Cont'd)

C. Identification of components referred to in this LER:

COMPONENT	IEEE 803 FUNCTION	IEEE 805 SYSTEM ID
Class 1E Switchgear	SWGR	EB
Emergency Diesel Generators	DG	EK
Circuit Breakers, AC	52	EB
Bus	BU	EB

