

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9807090335 DOC.DATE: 98/06/30 NOTARIZED: NO DOCKET #  
 FACIL:50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410  
 AUTH.NAME AUTHOR AFFILIATION  
 BOSNIC,D.P. Niagara Mohawk Power Corp.  
 DAHLBERG,K.A. Niagara Mohawk Power Corp.  
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-015-00: on 980530, past missed TS SR for Division I & II EDG were noted. Caused by required verification not being adequately performed. No specific corrective actions dealing w/event, W/980630 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 LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR 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/HICB	1 1
	NRR/DRCH/HOHB	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 LIST:  
 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: LTR 24 ENCL 24





NIAGARA MOHAWK

GENERATION  
BUSINESS GROUP

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

June 30, 1998  
NMP2L 1797

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

RE: . Docket No. 50-410  
LER 98-15

Gentlemen:

In accordance with 10CFR50.73 (a)(2)(i)(B), we are submitting LER 98-15, "Past Missed Technical Specification Surveillance Requirements for Division I and II Emergency Diesel Generators."

Very truly yours,

Kim A. Dahlberg  
Plant Manager - Unit 2

KAD/GJG/kap  
Attachment

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

9807090335 980630  
PDR ADOCK 05000410  
S PDR



## 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 2

DOCKET NUMBER (2)

05000410

PAGE (3)

1 OF 4

TITLE (4)

Past Missed Technical Specification Surveillance Requirements for Division I and II Emergency Diesel Generators

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)
05	30	98	98	015	00	06	30	98	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) 000	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(2)(v)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 73.71
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<i>(Specify in Abstract below and in Text, NRC Form 366A)</i>
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

D. P. Bosnic, Operations Manager - NMP2

TELEPHONE NUMBER

(315) 349-7952

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

EXPECTED SUBMISSION DATE (15)

MONTH

DAY

YEAR

 YES (If yes, complete EXPECTED SUBMISSION DATE) NO

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

On May 30, 1998, while shutdown for refueling, Niagara Mohawk power Corporation (NMPC) determined that Nine Mile Point Unit 2 (NMP2) Technical Specification Surveillance Requirement (TSSR) 4.8.1.1.2.e.7 for the Division I and II Emergency Diesel Generators (EDG) had not been met from October 31, 1986 (issuance of startup license) through February 15, 1989. The TSSR requires "Verifying that all automatic diesel generator trips are automatically bypassed upon loss of voltage on the emergency bus concurrent with an ECCS actuation signal except engine overspeed trip and generator differential trip." This TSSR is required to be demonstrated every 18 months while shutdown.

The root cause of this event has been determined to be that the required verification was not adequately performed by the initial surveillance procedure developers and subsequent reviewers. The depth of the research to determine if the TSSR was fully met was not sufficient to detect the error.

There are no specific corrective actions dealing with this event. The event is historical and the personnel who developed the procedures in 1986 are no longer employed with NMPC.



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 (3)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Nine Mile Point Unit 2	05000410	98	- .15	- 00	02 OF 04

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

## I. DESCRIPTION OF EVENT

On May 30, 1998, while shutdown for refueling, Niagara Mohawk Power Corporation (NMPC) determined that Nine Mile Point Unit 2 (NMP2) Technical Specification Surveillance Requirement (TSSR) 4.8.1.1.2.e.7 for the Division I and II Emergency Diesel Generators (EDG) had not been met from October 31, 1986 (issuance of startup license) through February 15, 1989. The TSSR requires "Verifying that all automatic diesel generator trips are automatically bypassed upon loss of voltage on the emergency bus concurrent with an ECCS actuation signal except engine overspeed trip and generator differential trip." This TSSR is required to be demonstrated every 18 months while shutdown.

The Division I and II EDGs have protective systems designed to initiate EDG trouble alarms and shutdown sequences to prevent damage to the EDG should a malfunction occur during the emergency or test mode of operation. The NMP2 Updated Safety Analysis Report (USAR) Section 8.3.1.1.2 describes the EDG Protection System. The EDG has test mode trips which protect the EDG during testing. The test mode trips are bypassed in the emergency mode. The intent of TSSR 4.8.1.1.2.e.7 is to demonstrate that the automatic test mode trips do not prevent EDG operation in the emergency mode.

On September 4, 1986, Operations Surveillance Procedure N2-OSP-EGS-R004, Operating Cycle Diesel Generator Simulated Loss of Offsite Power with ECCS Division I and II, Revision 0 was issued. This procedure satisfied several TSSRs including 4.8.1.1.2.e.7, which required that jumpers be installed to simulate signals to trip circuits which are bypassed in the emergency mode.

During NMPC's review of procedures for Generic Letter (GL) 96-01, it was determined that N2-OSP-EGS-R004, Revision 4 adequately demonstrated TSSR 4.8.1.1.2.e.7 but the documented methodology was incorrect. The procedure credits placement of jumpers to simulate the test mode automatic trips, however, the method of inserting the ECCS actuation and loss of emergency bus voltage signals rendered the jumpers ineffective. When N2-OSP-EGS-R004 is performed, it is done with the secondary start circuit to the EDG de-energized. When the circuit is de-energized, an automatic test trip is generated. Therefore, when the EDG starts and operates, bypass of the automatic trips in the emergency mode is demonstrated.

An investigation determined that the procedure revision which required de-energization of the secondary start circuit in N2-OSP-EGS-R004 was implemented on February 15, 1989 (for reasons not associated with this TSSR). Since that time, TSSR 4.8.1.1.2.e.7 was satisfied. However, from the issuance of the initial startup license until testing was completed on February 15, 1989, with the secondary start circuit de-energized, the TSSR was not satisfied. The Division III EDG surveillances were reviewed and a similar deviation did not exist.





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	15	00	03 OF 04

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

## II. CAUSE OF EVENT

The root cause of this event has been determined to be that the required verification was not adequately performed by the initial surveillance procedure developers and subsequent reviewers. The depth of the research to determine if the TSSR was fully met was not sufficient to detect the error.

## 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," for the period between October 31, 1986 and February 15, 1989.

The testing since 1989 has demonstrated that the required automatic trip circuits are bypassed when the EDGs are operated in the emergency mode. Since the circuit configuration has not changed, it is concluded that prior to 1989, the required trips would have been bypassed. Therefore, this event did not pose a threat to health and safety of the general public.

## IV. CORRECTIVE ACTIONS

There are no specific corrective actions dealing with this event. The event is historical and the personnel who developed the procedures in 1986 are no longer employed with NMPC. The procedure was recently revised to clarify the action which demonstrates compliance with the TSSR.

The reviews performed by the GL 96-01 team have demonstrated an acceptable level of detail regarding identification of problems associated with surveillance test procedures. The missed TS requirements discussed in this LER are a result of that review. Long-term enhancements for development and review of TSSR procedures will be based on an evaluation of the GL 96-01 review and previously noted deficiencies in this area.

## V. ADDITIONAL INFORMATION

A. Failed components: none.



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			
		98	- 15	- 00	04 OF 04		
Nine Mile Point Unit 2	05000410						

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

V. ADDITIONAL INFORMATION (Cont'd)

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, 98-07, 98-11, and 98-12 involved missed LSFT requirements. The cause of LER 98-04 was poor work practices, which led to an incorrect determination of what component served as the actuated device. LERs 98-07, 98-11, and 98-12 were similar to this LER and also involved poor work practices from previous LSFT and TS reviews. The rigor and level of detail of the GL 96-01 review has identified missed LSFT and TS requirements described in LERs 98-04, 98-07, 98-11, 98-12 and the missed TSSR described in this LER, and therefore, should prevent further occurrence.

C.. Identification of components referred to in this LER:

COMPONENT	IEEE 803 FUNCTION	IEEE 805 SYSTEM ID
Emergency Diesel Generator	DG	EK

