

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9807310026 DOC.DATE: 98/07/23 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.
DALHBERG,K.A. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-021-00:on 980623,determined that ISI exams of reactor vessel category D welds had not been performed IAW GL 88-01. Caused by inadequate change mgt.Revised ISI program & examined subject welds,per GL 88-01 schedule.W/980723 ltr.

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

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NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

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

July 23, 1998
NMP2L 1812

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

RE: Docket No. 50-410
LER 98-21

Gentlemen:

In accordance with 10CFR50.73(a)(2)(i)(B), we are submitting LER 98-21, "Missed Inservice Inspections Required by Technical Specifications Caused by Inadequate Change Management."

Very truly yours,

Kim A. Dahlberg
Plant Manager - NMP2

KAD/TWP/sc
Enclosure

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

9807310026 980723
PDR ADOCK 05000410
S PDR



LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.9 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)

Missed Inservice Inspections Required by Technical Specifications Caused by Inadequate Change Management

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)	
06	23	98	98	021	00	07	23	98	N/A	05000	
									N/A	05000	

OPERATING MODE (9)

4

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	TELEPHONE NUMBER
R.J. Dean, Engineering Manager - NMP2	(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 (Limits to 1400 spaces, i.e., approximately fifteen single space typewritten lines) (16)

On June 23, 1998, Niagara Mohawk Power Corporation (NMPC) personnel determined that the plant had not complied with Technical Specification (TS) Surveillance Requirement 4.0.5.f, regarding the Inservice Inspection (ISI) Program. Specifically, Nine Mile Point Unit 2 (NMP2) had not performed the ISI examinations of reactor vessel Category D welds consistent with the schedule requirements of Generic Letter (GL) 88-01 during the period between Refueling Outage One (RFO1) (in 1990) and RFO4 (in 1995).

The root cause of this event was inadequate change management in that the ISI Program Plan did not reflect the weld examination schedule required by GL 88-01. The examinations should have been performed in RFO3 (based on initial examination in RFO1) to comply with the 100 percent every two refuel cycle examination requirement. Contributing to this event was inadequate management oversight.

The ISI Program Plan was revised following RFO3 to reflect the appropriate GL 88-01 schedule and Category D welds have been examined in accordance with this schedule since RFO4. An independent review will be performed on GL 88-01 commitments to verify that the appropriate requirements were satisfied in the First Interval ISI Program Plan and are included in the Second Interval ISI Program Plan. Organizational changes were previously made to enhance the oversight and control of the ISI Program.



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) Nine Mile Point Unit 2	DOCKET NUMBER (2) 05000410	LER NUMBER (6)			PAGE (3) 02 OF 04
		YEAR 98	SEQUENTIAL NUMBER 21	REVISION NUMBER 00	

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

I. DESCRIPTION OF EVENT

On June 23, 1998, Niagara Mohawk Power Corporation (NMPC) personnel determined that the plant had not complied with Technical Specification (TS) Surveillance Requirement 4.0.5.f, regarding the Inservice Inspection (ISI) Program. Specifically, Nine Mile Point Unit 2 (NMP2) had not performed the ISI examinations of reactor vessel Category D welds consistent with the schedule requirements of Generic Letter (GL) 88-01 during the period between Refueling Outage One (RFO1) (in 1990) and RFO4 (in 1995).

Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," requires that all Category D welds in the plant be inspected every two refueling cycles. During the development of the post-RFO3 ISI Summary Report in early 1994, it was discovered that Category D weld examinations had not been appropriately scheduled. All Category D welds were inspected in RFO1 (Note: In RFO1, these welds were classified as Category A welds) as a result of issues unrelated to GL 88-01. A few welds had been inspected in RFO2 and RFO3, but most of the welds had not been inspected by the completion of RFO3. The Program Plan was revised to reflect the need to examine all reactor vessel Category D welds in RFO4. At the time (February 1994), NMPC believed that the examination schedule was still consistent with its commitments to GL 88-01, provided the remaining welds were examined in RFO4. This schedule was based on not exceeding 48 months (i.e., less than two refueling cycles) between examinations when plant time on line is considered. This position was described in the NMP2 ISI Summary Report following RFO3, dated February 25, 1994.

As a result of the examinations performed during RFO6 (completed June 1998), it was necessary to expand the examination scope to other Category D welds. It was during the review of the ISI Program requirements that the failure to comply with TS was identified. Based upon this review, it was determined that the previous understanding in 1994 was incorrect. The use of future expectations for 24 month refueling cycles was inconsistent with the given cycle lengths at that time (approximately 18 months). Although this position was described in the ISI Summary Report noted above, NMPC did not adequately evaluate this position against then current cycle lengths. As a result, NMP2 did not meet the GL 88-01 schedule commitments and was not in compliance with TS 4.0.5.f during the period between RFO1 and RFO4.

II. CAUSE OF EVENT

The root cause of this event was inadequate change management in that the ISI Program Plan did not reflect the weld examination schedule required by GL 88-01. The weld examinations should have been scheduled in RFO3 (based on initial examination in RFO1) to comply with the 100 percent every two refuel cycle examination requirement. Contributing to this event was inadequate management oversight during the period when GL 88-01 requirements were being incorporated into the ISI Program Plan.

The decision to not report this in 1994 was based on the belief that NMPC commitments to GL 88-01 were still met and thus were in compliance with the TS. This understanding was incorrect based on the refueling cycle lengths at the time and GL 88-01 schedule requirements of 100 percent examination of Category D welds every two refuel cycles.



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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-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)	DOCKET NUMBER (2)	LER NUMBER (6)				PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Nine Mile Point Unit 2	05000410	98	21	00	03 OF 04	

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

III. ANALYSIS OF EVENT

This event is being reported in accordance with 10CFR50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications." NMP2 did not meet its schedule commitments for Category D weld examination and therefore was not in compliance with TS 4.0.5.f.

Since RFO4 (when 100 percent of the subject welds were examined), NMP2 has remained in compliance with GL 88-01 and TS for Category D reactor vessel welds. Approximately 50 percent of the required welds were examined during each successive refuel outage (RFO5 and RFO6). All Category D welds were therefore examined by the completion of the two refuel cycle periods.

Examination results from all three RFOs have either been accepted as a direct result of satisfactory UT Exam results that met the ASME Section XI Code requirements or were accepted by engineering evaluation. Therefore, the integrity of the subject welds is assured. As a result, this event had no adverse affect on any safety system, nor the operators' ability to maintain safe reactor plant conditions. Therefore, this event posed no threat to the health and safety of the general public or plant personnel.

IV. CORRECTIVE ACTIONS

1. The ISI Program Plan was revised following RFO3 to reflect the appropriate GL 88-01 schedule and Category D welds have been examined in accordance with this schedule since RFO4.
2. An independent review will be performed of GL 88-01 commitments (excluding those already reviewed in this LER and LER 96-12) to verify that the appropriate requirements were satisfied in the First Interval ISI Program Plan and are included in the Second Interval ISI Program Plan. This will be completed by December 15, 1998.
3. As a result of an assessment completed in 1997, organizational changes were previously made to enhance the oversight and control of the ISI Program.

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-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)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Nine Mile Point Unit 2	05000410	98	- 21	- 00	04 OF 04

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

V. ADDITIONAL INFORMATION (Cont'd)

B. Previous similar events:

LER 96-12, Supplement 1, "Technical Specification Violation Involving Missed Augmented Inspections Caused by Inadequate Change Management," described a previous failure to examine 16 welds in the Reactor Water Cleanup System at the required frequency. This was caused by failure to transmit the appropriate information to the ISI Program Manager regarding reclassification of these welds from Category A to Category D welds. The event described in this LER did not involve reclassification of welds. The examination schedule in the ISI Program Plan in effect in 1996 was appropriate for Category D welds. It was the result of the need for expanded sampling during RFO6 that prompted the ISI Program review that identified this event.

C. Identification of components referred to in this LER: none



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