August 18, 1998

Mr. John H. Mueller Chief Nuclear Officer Niagara Mohawk Power Corporation Nine Mile Point Nuclear Station Operations Building, 2nd Floor P.O. Box 63 Lycoming, NY 13093

SUBJECT: ANNOUNCEMENT OF TEMPORARY INSTRUCTION 2515/137 INSPECTION

Dear Mr. Mueller:

This is to inform you that the NRC will perform a medium-voltage and low-voltage breaker inspection at your Nine Mile Point Nuclear Station, Unit 2. This inspection will be conducted in accordance with Temporary Instruction 2515/137, Revision 1, "Inspection of Medium-Voltage and Low-Voltage Power Circuit Breakers." The onsite activities of the inspection are scheduled for the week of September 21, 1998. The details of this inspection were discussed during a telephone call between Mr. Greg Gresock of your staff and Mr. Leonard Cheung of the NRC on August 17, 1998.

The inspection will assess safety-related medium-voltage and low-voltage switchgear maintenance activities, refurbishment and lubrication methods, programs to address NRC generic communications and manufacturers' generic communications as well as lessons learned from the industry, dedication of commercial-grade procured components for safety-related breakers, and your treatment of low-voltage and medium-voltage breakers under 10 CFR 50.65, "The Maintenance Rule." In addition, this review will assess breaker maintenance history information and breaker reliability.

We request that you arrange a short presentation (about one-hour duration) following the entrance meeting on September 21, 1998, regarding the maintenance and refurbishment programs, maintenance history and material condition of the low and medium voltage power circuit breakers installed at Nine Mile Point Unit 2.

Enclosed is a request for information. We would appreciate that the required information is provided to us by September 11, 1998, so that the team could prepare for the inspection.

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If you have any questions regarding the information on the enclosure, or on the inspection itself, please contact Leonard Cheung at (610) 337-5296.

Sincerely,

ORIGINAL SIGNED BY:

William H. Ruland, Chief Electrical Engineering Branch Division of Reactor Safety

Docket No. 50-410 License No. NPF-69

Enclosure: As stated

cc w/enclosure:

G. Wilson, Senior Attorney

M. Wetterhahn, Winston and Strawn

J. Rettberg, New York State Electric and Gas Corporation

P. Eddy, Electric Division, Department of Public Service, State of New York

C. Donaldson, Esquire, Assistant Attorney General, New York Department of Law

J. Vinguist, MATS, Inc.

F. Valentino, President, New York State Energy Research and Development Authority

J. Spath, Program Director, New York State Energy Research and Development Authority

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Distribution w/encl: Region I Docket Room (with concurrences) PUBLIC Nuclear Safety Information Center (NSIC) NRC Resident Inspector L. Doerflein, DRP W. Cook, DRP R. Junod, DRP J. Wiggins, DRS L. Nicholson, DRS W. Ruland, DRS L. Cheung, DRS C. Miskey, DRS

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ENCLOSURE

Information Request for Temporary Instruction 2515/137, Rev. 1 Inspection

- A. Documents to be sent to NRC Region I, Attention: Leonard Cheung
- A1. A listing of all safety-related medium-voltage and low-voltage metal-enclosed circuit breakers along with the following information for each breaker:

Original Equipment Manufacturer

Type/Model Number

Serial Number, if assigned (unique identifier, not just shop order number)

Cubicle Identification Number where currently installed

Original Equipment Supplier (if different from manufacturer)

Current Equipment Supplier (if different from original)

In-Service date

Date Most Recent Preventive Maintenance was performed

Date of Most Recent Complete Overhaul or Refurbishment

Breaker Functional Failures, whether in service or during testing in last five years, if any. Give root cause(s) and corrective action(s)

Any Other corrective maintenance in last five years (i.e., to correct unsat conditions discovered before failure in service)

Updates, Upgrades, or Modifications.

- A2. Plant procedures for general or corrective maintenance on the breaker.
- A3. Procedures governing your program for trending breaker performance, if any, and the name of the responsible person(s) to contact for further information. Examples of trending for two medium-voltage breakers and two low-voltage breakers will be reviewed on site if any exist.
- A4. Procedures governing how you handle equipment failures in terms of documenting the problem and performing root cause analysis (including inspection and testing).
- A5. An explanation of your participation (including meeting attendance, working group and tutorial activities, etc.) in one or more of the medium-voltage and low-voltage power circuit breakers users groups sponsored by the Nuclear Maintenance Applications Center (NMAC) of the Electrical Power Research Institute (EPRI) and by the Nuclear Energy Institute (NEI). Indicate any significant contribution to or use of EPRI/MAC technical information and the name(s) of your breaker user group(s) representative(s).

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- B. Documents to be sent to NRC Headquarter, Attention: Amar PaL, MS 7E4, OWFN
- B1. One copy of Item A1.
- B2 The procedure(s) used to perform routine periodic preventive maintenance (including routine periodic inspection, adjustments, cleaning, lubrication, electrical tests and diagnostic or predictive testing (e.g., timing or reduced control voltage testing if done) for safety-related breakers. If not specified in these procedures, please provide the plant-specified periodicity for preventive maintenance and the document that specifies it or an explanation of how it is specified. If not specified in these procedures, please state any required post maintenance restoration checks (e.g., post installation functional check in connect position) and what requires them.
- B3. The procedure or specification(s) used for breaker refurbishment, the frequency at which this refurbishment is performed, the document or explanation of what specifies the frequency or the conditions requiring refurbishment. Before arrival on site, we will select refurbishment from the list in Item A1 for detailed review during the inspection week, and will request that associated documentation (e.g., for procurement and dedication of services, procurement of parts used in house, work instructions, and records, etc.) be retrieved and made ready for review upon our arrival. We will call your Mr. Greg Gresock to inform you of our selection during the week of September 14, 1998. We would prefer to review original records and will request copies as required unless records are archived and must be printed from microfilm or microfiche.

For the purposes of this inspection by refurbishment (or overhaul or remanufacture) we mean major maintenance that includes most or all of the following: complete pre-disassembly inspection and testing (documenting all as-found results); complete disassembly of the breaker; inspection of all parts for damage and wear, inspection of lubricant for presence, proper type, condition (including hardening, dirt or evidence other contaminants) and documenting all as-found conditions; replacement of all worn (out-of-tolerance) or damaged parts (documenting parts replaced including dedication and traceability); cleaning, relubrication, represervation, reassembly, adjustment, final inspection and testing including obtaining baseline data for trending key operating parameters such as timing, forces, dimensions and adjustments, reduced control voltage tests, pole or contact resistance, insulation resistance (including both main poles and control components, etc.) Also, various modifications or upgrades desired by the licensee and/or recommended by the manufacturer may be accomplished.

B4. Procedures governing your programs for obtaining, reviewing, disseminating and using operational and industry experience information, including NRC, INPO, other licensees and the name(s) of the responsible person(s) to contact for further information.

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- B5. Procedures governing your program for obtaining, reviewing, disseminating, using and tracking disposition of technical information (including vendor manuals) from your NSSS vendor, and vendor(s) or manufacturer(s) of your non-NSSS scope of supply (balance of plant), but safety related equipment, i.e., your vendor interface program and the name(s) of responsible person(s) to contact for additional information.
- B6. Procedures governing procurement of repair and/or refurbishment services (including dedication of commercial-grade services or qualification of both commercial and Appendix B contractors, procedures governing dedication of spare and replacement parts for breakers used at your facility and the name(s) of the responsible person(s) to contact for further information.
- B7. A listing of medium-voltage and low-voltage metal-enclosed circuit breakers NOT included within the scope of 10 CFR 50.65, the Maintenance Rule.
- B8. A listing of medium-voltage and low-voltage metal-enclosed circuit breakers included within the scope of 10 CFR 50.65 with the following information:
 - a. For any in-scope, but non 1E breakers, state your scoping basis (e.g., functions important to safety and/or failure modes and effects adverse to safety considered).
 - b. Describe which breakers under the Maintenance Rule are treated as components of the functional plant system whose components the breakers directly supply power to (e.g., load breakers for service water pump motors, battery chargers, etc.).
 - c. Describe which breakers are treated as part of the medium-voltage, lowvoltage AC, or low-voltage DC electrical distribution systems (e.g., bus' feeders, bus ties, transformer feeder, load center switchboard or motor control center feeders, etc.).
 - d. Describe which breakers, if any, for which there are maintenance or performance issues, are treated as a separate class of components across train, system, or unit boundaries (i.e., common-mode breaker-related problems affecting more than one train, system or unit).
 - e. From breaker maintenance history, list any instances which breaker functional failures or breaker-related, train or system functional failures, or plant failures (e.g., scrams/trips/ unplanned shutdowns) were deemed maintenance preventable functional failures.
 - f. List any functional failures attributable to design, manufacturing, or deficient vendor technical documentation and explain any follow-up with the vendor.

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C. Documents to be provided on site ready for our review during the week of onsite inspection (September 21-25, 1998)

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C1. Documents listed on A and B above, with only one set of Item A1.

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C2. Your files relating to NRC Generic Letters 83-28 and 90-03 and its Supplement 1 and the name(s) of the responsible person(s) to contact for more information.

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