

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
 AUTH. NAME AUTHOR AFFILIATION
 WAAD, K.D. Niagara Mohawk Power Corp.,
 PALEOLOGOS, N.C. Niagara Mohawk Power Corp.
 RECIPIENT NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-024-00: on 980831, air removal pump trip circuitry was not in LSFT of MSL high radiation trip. Caused by personnel misinterpreting TS Table 3.3.2-1 Note (e). LSFT required trip of air removal pumps was completed. With 980930 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

September 30, 1998
NMP2L 1824

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

RE: Docket No. 50-410
LER 98-24

Gentlemen:

In accordance with 10CFR50.73(a)(2)(i)(B), we are submitting LER 98-24, "Air Removal Pump Trip Circuitry Not In Logic System Functional Test (LSFT) of Main Steam Line High Radiation Trip."

Very truly yours,

Nick Paleologos
Nick C. Paleologos
Plant Manager - NMP2

NCP/GJG/sc

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

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PDR ADDCK 05000410
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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)

Air Removal Pump Trip Circuitry Not in Logic System Functional Test (LSFT) of Main Steam Line High Radiation Trip

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)	
08	31	98	98	024	00	09	30	98	N/A		
									N/A		

OPERATING MODE (9)

1

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

POWER LEVEL (10)

100

- 20.2201(b)
- 20.2203(a)(1)
- 20.2203(a)(2)(i)
- 20.2203(a)(2)(ii)
- 20.2203(a)(2)(iii)
- 20.2203(a)(2)(iv)

- 20.2203(a)(2)(v)
- 20.2203(a)(3)(i)
- 20.2203(a)(3)(ii)
- 20.2203(a)(4)
- 50.36(e)(1)
- 50.36(e)(2)

- 50.73(a)(2)(i)
- 50.73(a)(2)(ii)
- 50.73(a)(2)(iii)
- 50.73(a)(2)(iv)
- 50.73(a)(2)(v)
- 50.73(a)(2)(vi)

- 50.73(a)(2)(viii)
- 50.73(a)(2)(x)
- 73.71
- OTHER
(Specify in Abstract below and in Text, NRC Form 366A)

LICENSEE CONTACT FOR THIS LER (12)

NAME

K.D. Ward, Manager Technical Support

TELEPHONE NUMBER

(315) 349-1043

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

On August 31, 1998, during the review to prepare the Nine Mile Point Unit 2 (NMP2) Improved Technical Specifications (ITS), it was determined that tripping of the air removal pumps was not being demonstrated as required by Note (e) of Technical Specification (TS) Table 3.3.2-1.

The cause of the event was that NMPC personnel misinterpreted TS Table 3.3.2-1 Note (e). The NMP2 TS Table 3.3.2-1 Note (e), as written, was interpreted as informational rather than as a requirement. A missed opportunity to correct this misinterpretation occurred when events from other licensees were not evaluated in the Niagara Mohawk Power Corporation (NMPC) Operating Experience (OE) program.

Corrective actions include satisfactory completion of the LSFT required trip/isolation of the air removal pumps, a future revision to the LSFT procedure, and a future review of the NMP2 TS to assure that other similar misinterpretations have not been made.

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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATIONESTIMATED 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
(0150-0104), 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	- 24	- 00	02 OF 04

TEXT (If more space is required, use additional NRC Form 366A's) (7)

I. DESCRIPTION OF EVENT

On August 31, 1998, during the review to prepare the Nine Mile Point Unit 2 (NMP2) Improved Technical Specifications (ITS), it was determined that tripping of the air removal pumps was not being demonstrated as required by Note (e) of Technical Specification (TS) Table 3.3.2-1.

The ITS team evaluated removal of the Main Steam Line Radiation Monitor (MSLRM) trip which had been evaluated in NEDO-31400, "Safety Evaluation for Eliminating the Boiling Water Reactor Main Steam Line Isolation Valve Closure Function and Scram Function of the Main Steam Line Radiation Monitor." The ITS team identified the control rod drop accident as the limiting accident to evaluate MSLRM trip removal. During that evaluation TS Table 3.3.2-1 Note (e) was reviewed and recognized as a TS Surveillance Requirement (SR) which was not being met.

During the development and subsequent review of the Logic System Functional Test (LSFT), there are three distinct reasons why Niagara Mohawk Power Corporation (NMPC) personnel interpreted TS Table 3.3.2-1 Note (e) as informational only. These reasons are:

1. TS Table 3.3.2-1 as written, "Also trips and isolates the air removal pumps," did not connote a requirement.
2. Note (e) only appeared in Table 3.3.2-1 of the TS Limiting Condition for Operation section for Primary Containment Isolation Signals, which also lead to confusion as to whether it was a SR. TSSR 4.3.2.2 and its associated Table 4.3.2.1-1 contained no similar notation.
3. The air removal pumps were not listed in the NMP2 Updated Safety Analysis Report (USAR) Table 15.0-5, which listed Non-Safety Grade Systems/Components assumed in the USAR transient analysis.

Additionally, NMPC did not effectively use industry operating experience (OE) information to identify this deficiency in the LSFT. For example, in 1993, Washington Nuclear Plant - Unit II submitted LER 93-010, Rev. 7, and in 1996, Clinton Power Station submitted LER 96-001, which reported similar events. Had either of these events been recognized and correctly evaluated for NMP2, this issue could have been identified and addressed earlier.

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-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20535, AND TO THE PAPERWORK REDUCTION PROJECT 0150-0104, OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LEX NUMBER (6)				PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Nine Mile Point Unit 2	05000410	98	-	24	-	00	03 OF 04

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

II. CAUSE OF EVENT

The cause of this event has been determined to be that NMPC personnel misinterpreted TS Table 3.3.2-1 Note (e) when the LSFT procedure was developed. Contributing to this was the lack of clarity in the NMP2 TS, USAR, and design basis information. Preparers of the LSFT procedure believed that TS Table 3.3.2-1 Note (e) was for information only, and that the trip function of the air removal pumps was not intended to be included in the LSFT procedure.

A missed opportunity to have identified this event sooner occurred when events from other licensed facilities were not properly evaluated for applicability for NMP2 in the NMPC OE program.

III. ANALYSIS OF EVENT

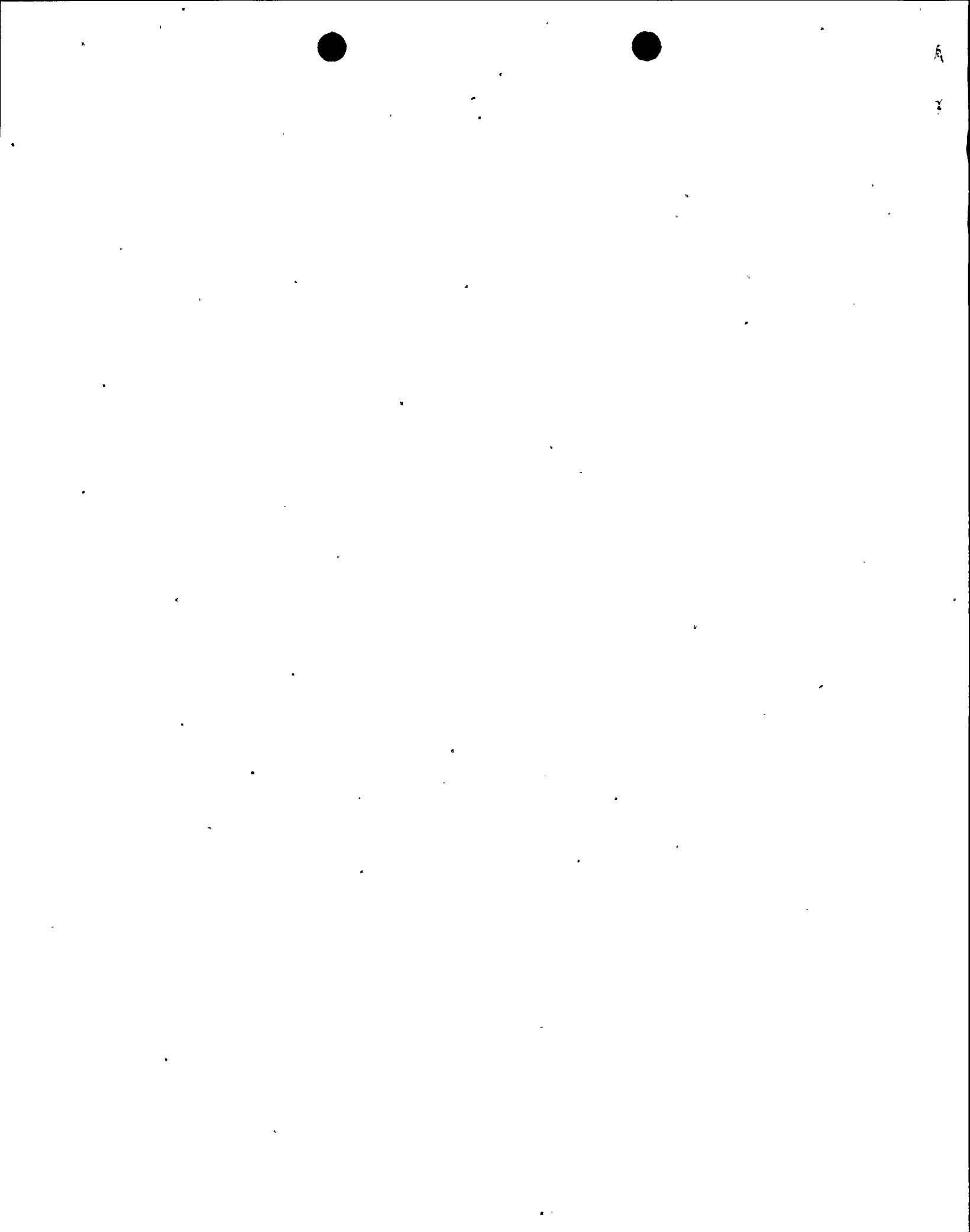
This event is reportable in accordance with 10CFR50.73(a)(2)(i)(B) "Any operation or condition prohibited by the plant's Technical Specifications."

On August 31, 1998, all Main Steam Line Radiation Monitors were declared inoperable, and TSSR 4.0.3 was entered, which allowed TS Actions to be delayed for up to 24 hours to complete the required surveillances. The test was completed and the circuitry performed as designed. Therefore, NMPC concluded that the trip function for the Main Steam Line Radiation Monitor was operable.

NMPC has evaluated a control rod drop accident without the air removal pumps tripping and the MSIV's failure to close, and concluded that 10CFR Part 100 limits would not have been exceeded. Based upon this conclusion, this event did not pose a threat to the health and safety of the general public.

IV. CORRECTIVE ACTIONS

1. Functionality of the air removal pump trip function was demonstrated on September 1, 1998.
2. The LSFT procedure will be revised to incorporate the testing of the air removal pump trip function by June 30, 1999 prior to its next use (scheduled January 2000).
3. A preliminary review of the NMP2 TS Tables, to determine if any other notes contained SR which were not met, has been completed. No obvious deficiencies were observed. A more thorough review of the NMP2 TS Tables will be completed to assure that there are no notes which are a TSSR and are not being tested. This will be completed by December 1, 1998.
4. Discussion of this event and the requirement of TS Table 3.3.2-1 Note (e) will be provided to Operations personnel and other applicable personnel. The purpose of this discussion will be to



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-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) 04 OF 04
		YEAR 98	SEQUENTIAL NUMBER 24	REVISION NUMBER 00	

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

IV. CORRECTIVE ACTIONS (Cont'd)

explain the event and to raise sensitivity with regard to TS requirements. This will be completed by November 30, 1998.

5. NMPC will evaluate the OE program to determine if the scope is appropriate and if the evaluations are being sufficiently performed. Corrective actions will be implemented by April 30, 1999, as appropriate.
6. Corrective actions from a DER which evaluated the adverse trend in missed TSSR are applicable to this event. The corrective actions include development of a key reference guide, enhanced training for writers and reviewers, and the development of tools for procedure reviews. These actions will provide enhanced barriers to prevent this type of event. These corrective actions are scheduled for completion in conjunction with implementation of the conversion to Improved Technical Specifications.

V. ADDITIONAL INFORMATION

- A. Failed components: none
- B. Previous similar events:

Over the past several years, 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 on January 20, 1998 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. The planned actions are as discussed in corrective action 6 above.

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

COMPONENT	IEEE 803 FUNCTION	IEEE 805 SYSTEM ID
MSIV Radiation Monitor	45	SB
Air Removal Pumps	P	SH

