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SUBJECT: Special rept:on 981016,main stack effluent monitoring instrumentation of gaseous effluent monitoring sys (GEMS) inoperable in excess of 72 hours,was identified.Caused by impact not adequately assessed.Suspended testing.

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FA2

Niagara Mohawk

November 13, 1998
NMP2L 1833

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

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Subject: ***Special Report - Supplement to Special Report NMP2L 1826***

Gentlemen:

On October 16, 1998, Niagara Mohawk Power Corporation (NMPC) submitted a Special Report (NMP2L 1826) in accordance with Nine Mile Point Unit 2 (NMP2) Technical Specification (TS) Table 3.3.7.10-1, "Radioactive Gaseous Effluent Monitoring Instrumentation," Action Statement 139b, concerning the inoperability of the Gaseous Effluent Monitoring System, (GEMS). From September 29, 1998 until October 8, 1998, the Main Stack Effluent Monitoring Instrumentation portion of GEMS had been inoperable in excess of 72 hours. At the time of that submittal, the Root Cause had not been determined. Therefore, NMPC committed to supplementing that Special Report by November 15, 1998. This submittal contains the Root Cause and additional Corrective Actions.

Event Description

On October 6, 1998 at 1630 hours, with the reactor mode switch in the "RUN" position at approximately 90 percent reactor power, Radiation Protection personnel identified during surveillance testing, that the Main Stack Effluent Monitoring Instrumentation portion of GEMS would not operate when post accident loads were added to the system's temporary power supply.

On September 29, 1998, maintenance personnel installed a temporary power supply to GEMS per maintenance procedure N2-EPM-GEN-3Y624 to facilitate battery replacement on the local uninterruptible power supply 2VBB-UPS1H while maintaining GEMS operable. Concurrent with the maintenance on 2VBB-UPS1H, a scheduled channel functional test was performed on GEMS. During that functional test, the supply breaker feeding GEMS from the temporary power supply tripped when the dilution pumps were started. This was the second time that the alternate power source to GEMS, during maintenance, had been implemented. During

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performance of the 10 year preventive maintenance procedure N2-EPM-GEN-10Y638 on September 19, 1997, GEMS had been powered temporarily utilizing the same configuration.

An investigation revealed that the temporary power supply has a capacity of 20 amps, and the normal power supply for GEMS is rated at 45 amps to support all system loads post accident. The normal operating GEMS load is 13.5 amps during non-accident mode conditions. When the dilution pumps were started during the channel functional test, the GEMS load exceeded the temporary breaker capacity.

The Station Shift Supervisor determined that the Main Stack Effluent Monitoring Instrumentation portion of GEMS, including the noble gas and flow measuring instrumentation was inoperable from the date that the temporary power supply was installed. The temporary power supply was installed on September 29, 1998 at 0830 hours. As a result, the period of GEMS inoperability exceeded 72 hours, requiring submittal of this Special Report, as specified by TS Action Statement 139b.

It should be noted that Section 12.3.1.3, Postaccident Access and Shield Design Review, of the NMP2 Updated Safety Analysis Report (USAR) contains an evaluation of access for sampling, if GEMS is inoperable. The results of the evaluation are that the doses are within acceptable limits. Therefore, even with GEMS being inoperable, post-accident sampling could have been performed to assess releases.

Cause of Event

The cause of the event has been determined to be that the impact of the temporary alteration to the GEMS System was not adequately assessed. A System Engineer proposed the temporary alteration as a way of making GEMS operable when 2VBB-UPS1H was removed from service. When Maintenance personnel prepared and reviewed the procedure, which included the temporary alteration, they failed to evaluate the GEMS System loads and the impact of connecting to a 20 amp breaker. Additionally, the cross-disciplinary review was performed by the System Engineer who had proposed the change, rather than being an independent person.

An opportunity to have prevented this event was missed when an Applicability Review (AR) was performed. An AR is an NMPC screening tool to determine if a 10CFR50.59 Safety Evaluation is required. The System Engineer, who proposed the temporary alteration, prepared an AR to determine whether a 10CFR50.59 Safety Evaluation was required. The System Engineer's intention was to return GEMS to functional status via the temporary alteration in order to eliminate the need for backup sampling. While the AR reviewer knew that the post-accident loads exceeded 40 amps, neither the AR reviewer nor the System Engineer recognized that in order to eliminate the need for backup sampling, the monitor would have to be fully operable, including all requirements of the post-accident condition.

Actions Taken

Immediate Actions

1. Surveillance testing was suspended until an adequate power supply was available to support system loads.

2. The System was returned to operable status on October 8, 1998 at 1721 hours.

3. Maintenance and Technical Support Branch Managers will review the responsibilities for procedure development and review with members of their staff who prepare and review procedures by January 30, 1999. This will include management expectations regarding cross-disciplinary reviews.

4. Maintenance and Technical Support personnel who prepare and review procedures will receive reinforcement on the basic requirements of Generic Letter 91-18 by January 30, 1999. This will include the definition of TS operability and the rigor of technical review required to develop an acceptable procedure.

Very truly yours,

Nicholas Paleologos

Nicholas Paleologos
Plant Manager - NMP2

NCP/GJG/kap

xc: Mr. H. J. Miller, Regional Administrator, Region I
Mr. G. K. Hunegs, Senior Resident Inspector
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