

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
WARD,K. Niagara Mohawk Power Corp.
PALEOLOGOS,N. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 99-002-00:on 990304,noted missed TS channel functional test of recirculation flow upscale rod block.Caused by deficiencies in outage planning & implementation process. Corrected applicable SR procedure.With 990405 ltr.

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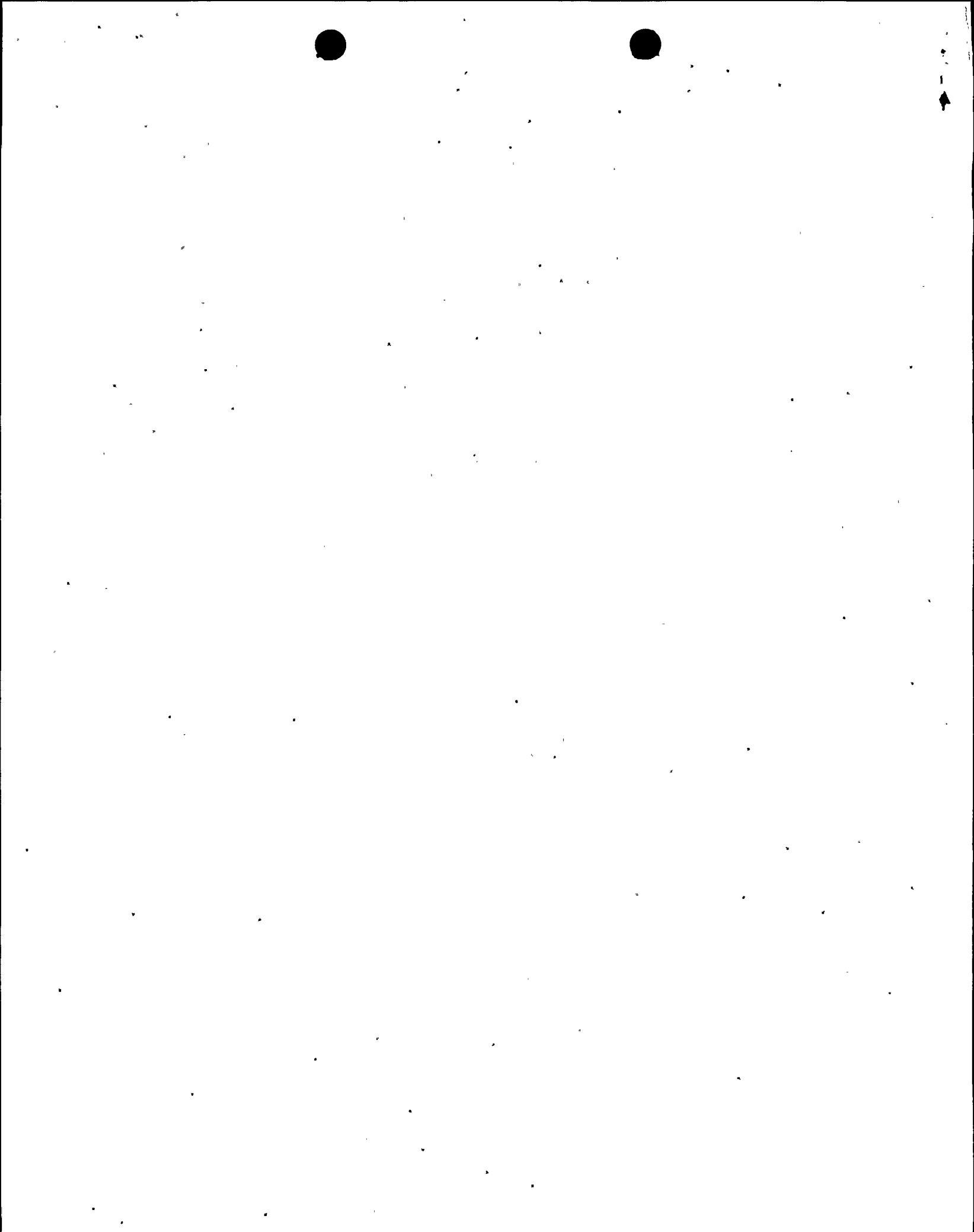
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Niagara  Mohawk

April 5, 1999
NMP2L 1858

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

RE: Docket No. 50-410
LER 99-02

Gentlemen:

In accordance with 10CFR50.73(a)(2)(i)(B), we are submitting LER 99-02, "Missed Technical Specification Channel Functional Test of the Recirculation Flow Upscale Rod Block."

Very truly yours,



Nick Paleologos
Plant Manager - NMP2

NCP/KLL/kap
Attachment

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

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JE22

9904130250 990405
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LICENSEE EVENT REPORT (LER)

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

PAGE (3)

01 OF 04

TITLE (4)

Missed Technical Specification Channel Functional Test of the Recirculation Flow Upscale Rod Block

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)
03	04	99	99	02	00	04	05	99	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(c)(1)
 50.36(c)(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)(vii)

- 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

Mr. Keith 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 EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

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 March 4, 1999, with Nine Mile Point Unit 2 in full power operation, maintenance support personnel discovered that the Technical Specification Surveillance Requirement 4.3.6, Table 4.3.6-1, Trip Function 5.a, channel functional test requirement for the recirculation flow upscale rod block function, had not been met.

The cause of the missed Surveillance Requirement was that the accuracy of the applicable Surveillance Requirement procedure change was not properly verified due to deficiencies in the outage planning and implementation process, and inadequate self-checking.

Corrective actions included correcting the applicable Surveillance Requirement procedure and performing the missed Surveillance Requirement test with satisfactory results. Additional corrective actions included enhancing the outage planning and implementation process, addressing the self-checking failure with the individuals involved, and reviewing the remaining refueling outage 6 modifications for similar problems.



NRC FORM 366A	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED OMB NO. 3150-0104 EXPIRES:
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	SEQUENTIAL NUMBER	REVISION NUMBER	
		99	02	00	

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

I. DESCRIPTION OF EVENT

On March 4, 1999, with Nine Mile Point Unit 2 (NMP2) in full power operation, maintenance support personnel discovered that the Technical Specifications (TS) Surveillance Requirement (SR) 4.3.6, Table 4.3.6-1, Trip Function 5.a, channel functional test requirement for the Recirculation Flow Upscale rod block function, had been omitted from instrument surveillance procedure N2-ISP-NMS-SA001 (LPRM/APRM Channel Functional Test). As a result, the recirculation flow upscale rod block function of the semi-annual SR 4.3.6, Table 4.3.6-1, Trip Function 5.a, was not met.

NMP2 completed a modification to the Power Range Neutron Monitor (PRNM) system during the Refueling Outage 6 (RFO6). Instrument and Controls (I&C) personnel completed writing surveillance procedures to accommodate the changes to the Local Power Range Monitors (LPRMs) and Average Power Range Monitors (APRMs) in March 1988, as part of the implementation of the modification. However, the I&C procedure writer inadvertently omitted the recirculation flow upscale rod block surveillance requirement from procedure N2-ISP-NMS-R001, which was used as a template for preparing the remaining refueling cycle and semi-annual surveillance procedures. The technical reviewer also did not identify the omission.

During a review for reactor protection Logic System Functional Test compliance in April 1998, a system engineer identified the absence of the recirculation flow upscale rod block surveillance requirement, which was outside the defined scope of the engineer's review. I&C personnel then revised N2-ISP-NMS-R001 and the other refueling cycle procedures to include the requirement, but did not revise N2-ISP-NMS-SA001. The I&C personnel who revised the procedures did not include the original procedure author, and these procedure writers were unaware that N2-ISP-NMS-R001 was the template for N2-ISP-NMS-SA001. This was a missed opportunity to correct procedure N2-ISP-NMS-SA001.

Following installation of the LPRM/APRM modification, I&C personnel satisfactorily completed N2-ISP-NMS-R001 and the other refuel cycle surveillance procedures, which also satisfied semi-annual surveillance requirements of SR 4.3.6, Table 4.3.6-1, Trip Function 5.a.

On March 4, 1999, maintenance personnel identified the missed SR, initiated Deviation/Event Report 2-99-0656, revised the procedure, and tested the Recirculation Flow Upscale rod block function satisfactorily.

With the extension allowed by TS 4.0.2, the semi-annual SR 4.3.6, Table 4.3.6-1, Trip Function 5.a, was due by January 12, 1999, but was not completed by that date due to the omission of the requirement from N2-ISP-NMS-SA001.

II. CAUSE OF EVENT

The root cause of the event was that the accuracy of the procedure change was not properly verified. This was due to deficiencies in the process of planning, implementation, and management of these changes. Process deficiencies led to a late issue of the final design, performance of multiple concurrent activities, and inadequate resource distribution at different points of the project.

A contributing cause was that the original I&C procedure writer failed to properly implement self-checking.



11-1-2

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
(3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)				PAGE (7)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Nine Mile Point Unit 2	05000410	99	- 02	- 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." The semi-annual functional test requirement of the recirculation flow upscale rod block function (NMP2 SR 4.3.6, Table 4.3.6-1, Trip Function 5.a) was not met within the required TS time interval.

On March 4, 1999, I&C personnel satisfactorily updated procedure N2-ISP-NMS-SA001 and determined that the recirculation flow upscale rod block function remained functional. In addition, engineering services personnel reviewed this event and determined that failure to meet the semi-annual recirculation flow upscale rod block function was not risk significant with regard to Core Damage Frequency (CDF) because the function is not credited in any NMP2 design basis accident or transient analysis. Therefore, the failure to meet the semi-annual recirculation flow upscale rod block channel functional test requirement had no effect on CDF, and Niagara Mohawk Power Corporation has determined that this event had no adverse effect on the health and safety of the public or site workers.

IV. CORRECTIVE ACTIONS

- I&C personnel revised procedure N2-ISP-NMS-SA001 and satisfactorily tested the Recirculation Flow Upscale rod block function on March 4, 1999.
- The behaviors of the personnel involved in this missed surveillance have been addressed.
- Technical support, operations, maintenance, chemistry, radiation protection, and licensing personnel will review all RFO6 modifications to ensure all surveillance requirements have been or will be satisfied by established surveillance procedures, on or before October 15, 1999.
- Based on the RFO6 post-outage critique, NMP has enhanced outage preparation. The enhancements are effective, as evidenced by the RFO7 outage plan schedule adherence. As a result of lessons learned to date, additional emphasis is being placed on the need for management to control the workload of individuals involved in procedure development, and for workers to raise workload concerns before these issues affect the quality of procedures.

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 (5)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Nine Mile Point Unit 2	05000410	99	02	00	04 OF 04

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

V. ADDITIONAL INFORMATION

A. Failed components: none.

B. Previous similar events:

Technical support personnel initiated Deviation/Event Report 2-98-0122 to address a trend in missed NMP2 TS surveillance requirements due to procedure inadequacies (12 previous LERs from 1996 through 1997). The event reported in this LER occurred during the same time frame as the processing of DER 2-98-0122. Therefore, corrective actions from that DER would not have prevented this event.

In the disposition to DER 2-98-0122, NMPC identified that a majority of the deviations reported in the LERs required in-depth review and interpretation of technical criteria before dedicated reviewers with detailed knowledge were able to determine that a deficiency existed. The remaining LERs involved confusion over the interpretation of TS 4.0.4. This event involved requirements that had been identified prior to development of the procedure, but were inadvertently omitted. In this regard, this event was dissimilar from those identified in DER 2-98-0122.

C. Identification of components referred to in this LER:

COMPONENT	IEEE 803 FUNCTION	IEEE 805 SYSTEM ID
APRM/LPRM/PRNM	MON	IG

