

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
 YAEGER, W. Niagara Mohawk Power Corp.
 PALEOLOGOS, N. Niagara Mohawk Power Corp.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 99-007-00: on 990525, determined that sections of piping & pipe supports in HPCS sys from condensate storage tank to pump were improperly exempted. Caused by inadequate mgt oversight. Made organizational changes. With 990624 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
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Niagara Mohawk

June 24, 1999
NMP2L 1875

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

RE: Docket No. 50-410
LER 99-07

Gentlemen:

In accordance with 10CFR50.73(a)(i)(B), we are submitting Licensee Event Report 99-07, "Violation of Technical Specifications Regarding ASME Code Section XI Class 2 Weld Inspection Requirements Due to Improper Use of A Code Exemption."

Very truly yours,



Nick Paleologos
Plant Manager - NMP2

NCP/KLL/mlh
Attachment

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

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PDR ADOCK 05000410
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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.8 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) Nine Mile Point Unit 2	DOCKET NUMBER (2) 05000410	PAGE (3) 01 OF 05
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TITLE (4)
Violation of Technical Specifications Regarding ASME Code Section XI Class 2 Weld Inspection Requirements Due to Improper Use of A Code Exemption

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)
05	25	99	99	07	00	06	24	99	N/A	
									N/A	

-OPERATING MODE (9) | 1 | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 4: (Check one or more of the following) (11)

POWER LEVEL (10) 100%	<input type="checkbox"/> 20.2201(b) <input type="checkbox"/> 20.2203(a)(1) <input type="checkbox"/> 20.2203(a)(2)(i) <input type="checkbox"/> 20.2203(a)(2)(ii) <input type="checkbox"/> 20.2203(a)(2)(iii) <input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 20.2203(a)(2)(v) <input type="checkbox"/> 20.2203(a)(3)(i) <input type="checkbox"/> 20.2203(a)(3)(ii) <input type="checkbox"/> 20.2203(a)(4) <input type="checkbox"/> 50.36(c)(1) <input type="checkbox"/> 50.36(c)(2)	<input checked="" type="checkbox"/> 50.73(a)(2)(i) <input type="checkbox"/> 50.73(a)(2)(ii) <input type="checkbox"/> 50.73(a)(2)(iii) <input type="checkbox"/> 50.73(a)(2)(iv) <input type="checkbox"/> 50.73(a)(2)(v) <input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 50.73(a)(2)(viii) <input type="checkbox"/> 50.73(a)(2)(x) <input type="checkbox"/> 73.71 <input type="checkbox"/> OTHER <i>(Specify in Abstract below and in Text, NRC Form 366A)</i>
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LICENSEE CONTACT FOR THIS LER (12)

NAME Mr. William Yaeger, Manager Engineering Services	TELEPHONE NUMBER 315-349-7834
--	----------------------------------

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPX

SUPPLEMENTAL REPORT EXPECTED (14)	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO				

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

On May 25, 1999, with Nine Mile Point Unit 2 (NMP2) at full power, engineering determined that sections of piping and pipe supports in the high pressure core spray system from the condensate storage tank to the pump were improperly exempted from the First and Second Ten Year Interval Inservice Inspection (ISI) Program Plans. As a result of improperly applying the exemptions, Niagara Mohawk Power Corporation (NMPC) did not comply with Technical Specifications Surveillance Requirement 4.0.5.a during the first ten year interval. This discrepancy was discovered during expanded corrective actions from LER 98-21.

NMPC determined that the cause of the deviation was misinterpretation of the ASME Code Section XI exemption requirement during the development of both the First and Second Ten Year Interval ISI Program Plans. A contributing cause was identified as inadequate management oversight.

As discussed in LER 98-21, NMPC has previously made organizational changes to enhance the oversight and control of the ISI Program. In addition, NMPC has completed an independent detailed review of the Second Ten Year Interval ISI Program Plan.



FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Nine Mile Point Unit 2	05000410	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	02 OF 05
		99	- 07	- 00	

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

I. DESCRIPTION OF EVENT

On May 25, 1999, with Nine Mile Point Unit 2 (NMP2) at full power, engineering determined that sections of piping in the high pressure core spray system from the condensate storage tank to the pump were improperly exempted from the First and Second Ten Year Interval Inservice Inspection (ISI) Program Plans.

Niagara Mohawk Power Corporation (NMPC) engineering performed a comprehensive review of the NMP2 Second Ten Year Interval ISI Program Plan in accordance with the corrective actions of NMPC Deviation/Event Report 2-98-1979 (Deficiencies Found in Partial Review of NMP2 Second Ten Year ISI & IWF Program Plans). During this review, engineering determined that NMPC had incorrectly exempted from examination portions of the NMP2 high pressure core spray system based upon temperature and pressure. The improperly exempted components included 52 circumferential welds and 4 piping supports.

NMP2 Technical Specification Surveillance Requirement 4.0.5.a requires that inservice inspections of American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda. ASME Section XI, 1989 Edition, sub-paragraph IWC-1221 defines the exemption criterion for ASME Class 2 components in the residual heat removal, emergency core cooling, and containment heat removal systems (or portions of the systems). NMPC improperly applied the exemption based on paragraph IWC-1222, which allows pressure and temperature exemptions only for systems other than residual heat removal, emergency core cooling, and containment heat removal.

ASME Code Section XI, Table IWC-2500-1, Category C-F-1, requires examination of 7.5 percent of the available ASME Section XI Class 2 welds. As a result of improperly applying the exemptions during the first ten year interval, NMPC did not examine the required percentage of the high pressure core spray system ASME Code Section XI Class 2 welds. To meet ASME Code Section XI requirements NMPC should have inspected four additional welds by volumetric and surface examination methods in that system, but did not. Subsequent review determined that the ASME Code Section XI requirements had been met for pipe supports since the total population of supports examined far exceeded the 15 percent required by the code.

NMP2 is presently in the second ten year interval. The required inspections will be added to the Second Ten Year Interval ISI Program Plan and will be performed prior to the end of the interval. Therefore, this deviation constitutes a non-compliance of NMP2 Technical Specifications Surveillance Requirements 4.0.5.a with regard to the first ten year interval only.



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 20535, AND TO THE PAPERWORK REDUCTION PROJECT
(3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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Nine Mile Point Unit 2	05000410	99	07	00	03 OF 05	

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

II. CAUSE OF EVENT

NMPC determined that the cause of the deviation was a misinterpretation of the ASME Code Section XI exemption requirement during the development of both the First and Second Ten Year Interval ISI Program Plans. NMPC applied a pressure and temperature exemption that could only be utilized for systems other than emergency core cooling, residual heat removal, and containment heat removal systems.

A contributing cause to this event was inadequate management oversight of the program in that improper use of the exemption was not corrected during development of the second ten year interval. This contributing cause was previously addressed in LER 98-21.

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." NMPC did not meet the requirements of Technical Specification 4.0.5.a, which requires that ASME Code Class 2 components be inspected according to Section XI of the ASME Boiler and Pressure Vessel Code and applicable agenda. Specifically, NMPC did not perform the required percentage of Class 2 weld inspections for the first ten year Interval.

NMPC examined four of the improperly exempted welds (i.e., 7.5 percent of the improperly exempted welds) on May 26, 1999, thereby performing the required percentage of Code Class 2 weld inspections required by ASME Code Section XI criteria. NMPC found those welds to be acceptable. Therefore, the application of the improper exemptions would not have prevented the high pressure core spray system from performing its safety function. The health and safety of the public and plant operators was not adversely affected by this event.

IV. CORRECTIVE ACTIONS

1. NMPC examined four of the improperly exempted ASME Code Class 2 welds to verify operability of the high pressure core spray system.
2. As described in LER 98-21, corrective action 3, organization changes were made to enhance the oversight and control of the ISI Program. These changes provided an engineering group staffed to ensure that ISI Program Plan development and administration are performed by a sufficient number of properly qualified personnel with appropriate oversight.



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.

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

IV. CORRECTIVE ACTIONS (Cont'd)

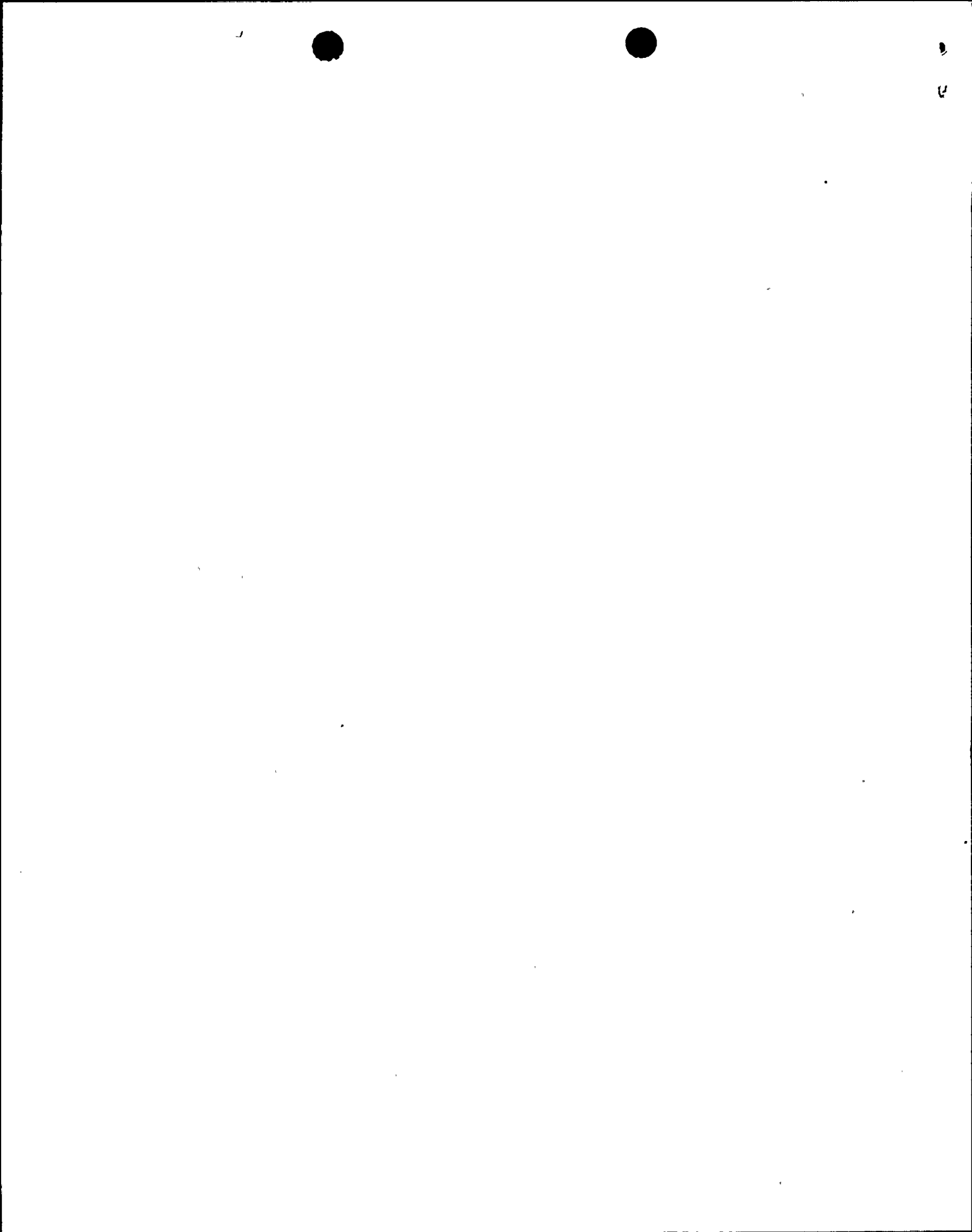
3. NMPC has completed an independent detailed review of the Second Ten Year Interval ISI Program Plan, as initiated by LER 98-21, and will revise the plan to correct any errors and omissions by July 31, 1999.

V. ADDITIONAL INFORMATION

A. Failed components: none.

B. Previous Similar Events

- LER 98-21 described a previous deficiency in the ISI program involving a noncompliance with Technical Specification 4.0.5.f. NMP2 did not examine reactor vessel Category D welds consistent with the schedule requirements of Generic Letter 88-01 during the period between Refueling Outage 1 and Refueling Outage 4. In LER 98-21, NMPC committed to completing an independent review of the program to ensure all Generic Letter 88-01 commitments were included in the Second Ten Year Interval ISI Program Plan. NMPC expanded this review to include a detailed independent and thorough review of the Second Ten Year Interval ISI Program Plan. This expanded detailed review lead to identifying the discrepancies identified in this LER.
- LER 96-12 (and 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. The cause of that event was that pertinent information concerning reclassification of welds from Category A to Category D was not transmitted to the ISI program manager. NMPC had corresponded with the NRC indicating that the subject welds would be incorporated into the program. However, that reclassification of these welds was not made in the ISI Program Plan, due to failure to follow NMPC's change processes governing commitments made to the NRC. The corrective actions from LER 96-12 included the correction of the classification of welds in the program, and an evaluation of management methods and ISI program oversight. These corrective actions were focused on fixing communications and defining responsibilities of personnel involved in the ISI program. The LER 96-12 event involved an NRC commitment that was not properly incorporated into the ISI program. Therefore, the corrective actions for LER 96-12 would not have prevented the event identified in this LER.



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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V. **ADDITIONAL INFORMATION** (Cont'd)

C. Identification of components referred to in this LER:

Components	IEEE 803A Function	IEEE 805 System ID
High Pressure Core Spray System	N/A	BG

