

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9907120148    DOC. DATE: 99/06/29    NOTARIZED: NO    DOCKET #  
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha    05000410  
 AUTH. NAME    AUTHOR AFFILIATION  
 LOCHBAUM, D.A.    Union of Concerned Scientists  
 RECIP. NAME    RECIPIENT AFFILIATION  
 MILLER, H.J.    Region 1 (Post 820201)

SUBJECT: Submits questions as followup on safety hazard caused by inadequate corrective action.

DISTRIBUTION CODE: IE01D    COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 5  
 TITLE: General (50 Dkt) - Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
	LPD1-1 PD	1	HOOD, D	1
INTERNAL:	ACRS	2	AEOD/TTC	1
	DEDRO	1	<u>FILE CENTER</u>	1
	NRR/DIPM/IIPB	1	NRR/DIPM/OLHP	1
	NRR/DRIP/REXB	1	NUDOCS-ABSTRACT	1
	OE	1	OGC/RP	1
	RGN1 FILE 01	1		
EXTERNAL:	LIMITCO MARSHALL	1	NOAC	1
	NRC PDR	1	NUDOCS FULLTEXT	1

NOTE TO ALL "RIDS" RECIPIENTS:  
 PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS  
 OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL  
 DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTR 18 ENCL 2

*ACRS*

C  
A  
T  
E  
G  
O  
R  
Y  
  
1  
  
D  
O  
C  
U  
M  
E  
N  
T



**UNION OF  
CONCERNED  
SCIENTISTS**

June 29, 1999

Mr. Hubert J. Miller, Regional Administrator  
United States Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406-1415

**SUBJECT: FOLLOWUP ON SAFETY HAZARD AT NINE MILE POINT UNIT 2 CAUSED BY  
INADEQUATE CORRECTIVE ACTIONS**

Dear Mr. Miller:

By letters dated June 25 and June 28, 1999, I expressed concern about reduced safety levels at the Nine Mile Point Unit 2 (NMP-2) plant resulting from degraded performance of the reactor core isolation cooling (RCIC) system. I appreciate the telephone calls from yourself, Ms. Michele G. Evans, and Mr. Richard V. Crlenjak regarding this matter. My June 28, 1999, letter stated that I had escalated the matter to your attention following an apparent lack of interest in the RCIC problems by a member of your staff. Based on the telephone discussions, I recognize that other members on your staff were interested in RCIC system problems at NMP-2 prior to the June 24, 1999, event and that this interest was heightened by the recent problem.

Ms. Evans told me that the NRC inspection report issued June 21, 1999, covered the RCIC system problems during the April 24, 1999, event at NMP-2. I have reviewed that inspection report. According to Section M2.1 of that report:

During the reactor scram, reactor low water level was reached and the RCIC system received an automatic start signal. The RCIC injection valve opened and the trip throttle valve indicated that it was open. ... Subsequent troubleshooting showed that the RCIC system has received a valid initiation signal and that the steam admission and outboard injection valves had opened. Data recorder confirmed that the RCIC turbine speed that increased to 200 rpm, at which point the turbine trip valve was tripped. ... NMPC determined that the set-up of the overspeed trip linkage and associated valve components was not correct. The inspectors determined that the RCIC turbine trip throttle valve had been disassembled and rebuilt during the 1998 outage. ... Licensee review determined that the overspeed trip linkage tolerances were not described in the work package and consequently the linkage was re-assembled with incorrect tolerances.

I also reviewed the applicable portions of the Individual Plant Examination (IPE) for NMP-2 (NRC Ascension No. 9208050183).

9907120148 990629  
PDR ADOCK 05000410  
H PDR

Washington Office: 1616 P Street NW Suite 310 • Washington DC 20036-1495 • 202-332-0900 • FAX: 202-332-0905  
Cambridge Headquarters: Two Brattle Square • Cambridge MA 02238-9105 • 617-547-5552 • FAX: 617-864-9405  
California Office: 2397 Shattuck Avenue Suite 203 • Berkeley CA 94704-1567 • 510-843-1872 • FAX: 510-843-3785

1/10  
Iccol



From my review of the available information on the April 24, 1999, and June 24, 1999, RCIC failure events, I have the following questions:

1. According to page 3.2.1.2-7 of the NMP-2 IPE: "Failure of RCIC turbine protective devices are not modeled. The frequency of protective device demand and failure is small in comparison to existing failure modes that are modeled."

**Q – Based on the April 24, 1999, event in which the RCIC system failed due to malfunction of the overspeed trip linkage, was NMPC's decision not to model the RCIC turbine protective devices proper?**

2. According to page 3.2.1.2-1 of the NMP-2 IPE: "RCIC is also included in the station blackout (SBO) event tree model," "RCIC operates for the first two hours of the [SBO] scenario," "RCIC continues operating from hour 2 to hour 8 into the [SBO] scenario," and "RCIC continues operating from hour 8 to hour."

**Q – Given the RCIC system's failure upon demand in the April 24, 1999, event and its failure within 6 hours following demand in the June 24, 1999, event, how would NMP-2 have coped with a station blackout event?**

**Q – Are the RCIC system reliability numbers contained in Section 3.3.5 of the NMP-2 IPE significantly non-conservative based on actual plant experience over the past two years?**

3. The NRC inspection report stated that the April 24, 1999, RCIC failure was attributed to improper maintenance during the 1998 outage.

**Q – Why did the RCIC system testing performed following the 1998 outage fail to detect the overspeed trip linkage tolerance problems?**

While I do not expect a formal response to these questions prior to the NRC permitting NMP-2 to restart, I respectfully request that the NRC consider these issues as it audits the licensee's repair efforts and decides if the RCIC system has been restored to acceptable safety levels. I would like a formal response to these questions after the plant restarts.

Sincerely,



David A. Lochbaum  
Nuclear Safety Engineer

