

CATEGORY 1

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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 99-011-00:on 990719, valves were not correctly tested as required by TS 4.0.5.Caused by misclassification of valves due to misapplication of NUREG-1482.Reclassified & tested 26 valves.With 990818 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 6
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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Niagara  Mohawk®

August 18, 1999
NMP2L 1889

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

RE: Docket No. 50-410
LER 99-11

Gentlemen:

In accordance with 10CFR50.73(a)(2)(i), we are submitting Licensee Event Report 99-11,
"Valves Not Correctly Tested As Required by Technical Specification 4.0.5."

Very truly yours,



Nick Paleologos
Plant Manager - NMP2

NCP/CES/kap
Attachment

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

9908270071 990818
PDR ADOCK 05000410
S PDR



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)

01 OF 05

TITLE (4)

Valves Not Correctly Tested as Required by Technical Specification 4.0.5

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)
07	19	99	99	011	00	08	18	99	N/A	
									N/A	

OPERATING MODE (9)

4

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

POWER LEVEL (10) 0%	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(2)(v)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 73.71
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(e)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<i>(Specify in Abstract below and in Text, NRC Form 366A)</i>
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.36(e)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

William Yaeger - Manager Nuclear 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 EPD	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPD

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 July 19, 1999, while Nine Mile Point Unit 2 was shutdown, Niagara Mohawk Power Corporation identified 26 valves in multiple systems that were not being tested as required by Technical Specification 4.0.5. The valves were misclassified as passive valves; therefore, not all required testing was being conducted.

The cause of the incomplete testing of the 26 valves was misclassification of the valves due to a misapplication of NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," Paragraph 2.42, as applied to American Society of Mechanical Engineers Section XI and ASME/ANSI OMa-1988 Addenda (ASME/ANSI OM-1987 Operation and Maintenance of Nuclear Power Plants), Part 10 Codes and Standards.

Corrective actions include: reclassifying and testing the 26 valves, reviewing the Nine Mile Point Unit 1 program for similar discrepancies; communicating management's expectations to individuals who misclassified the 26 valves on the importance of considering all design/license bases requirements and maintaining consistency between design/license bases and Inservice Testing Programs, and reviewing all valves that are presently exempt, passive, or had testing requirements reduced in the Second Ten-Year Interval Inservice Testing Program Plan to validate the valves' classification and testing requirements.

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)	DOCKET NUMBER (2)	LER NUMBER (6)				PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Nine Mile Point Unit 2	05000410	99	- 011	- 00	02 OF 05	

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

I. DESCRIPTION OF EVENT

On July 19, 1999, at approximately 7:00 p.m., while Nine Mile Point Unit 2 was shutdown, Niagara Mohawk Power Corporation (NMPC) identified 26 valves in multiple systems that were not being tested as required by Technical Specification 4.0.5. NMPC misclassified the valves as passive instead of active; therefore, NMPC had not been performing all of the required testing.

During the development of the Second Ten-Year Interval Inservice Testing Program Plan which became effective in April 1998, NMPC reclassified the valves from active to passive based on a misapplication of NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," and NRC Public Workshops on Inservice Inspections (1997), Questions and Answers, as applied to American Society of Mechanical Engineers (ASME) Section XI and ASME/ANSI OMa-1988 Addenda (ASME/ANSI OM-1987 Operation and Maintenance of Nuclear Power Plants), Part 10 Codes and Standards. This inappropriate classification occurred due to the misapplication of Paragraph 2.4.2 of NUREG-1482 which suggested that a valve need not be considered active if the valve is only temporarily removed from service or from its safety position for a short period of time. This resulted in the classification of the 26 valves in the Second Ten-Year Interval Inservice Testing Program Plan contrary to the design/license bases requirements.

In June 1999, the Independent Safety Engineering Group identified that three valves on the active valve list in the Updated Safety Analysis Report were not classified as active valves in the Second Ten-Year Interval Inservice Testing Program Plan. The ASME Section XI Programs Group's position regarding classification was that the inservice testing program and the active valve table had different requirements; therefore, there may be differences between the active valve table and the approved Inservice Testing Program Plan, as long as the differences were clearly described. The Independent Safety Engineering Group did not accept that position, and after further management review on July 19, 1999, it was concluded that the valves had in fact been misclassified in the Inservice Testing Program Plan. To determine the extent of condition, NMPC reviewed all passive valves in the Second Ten-Year Interval Inservice Testing Program Plan against the valves listed on the active valve table in the Updated Safety Analysis Report and valves whose testing requirements had been reduced in the Second Ten-Year Interval Inservice Testing Program Plan. From these reviews, NMPC determined that the following 26 valves had been classified from active to passive in error:

- High Pressure Core Spray Valve 2CSH*MOV110
- High Pressure Core Spray Valve 2CSH*MOV112
- Reactor Core Isolation Cooling Valve 2ICS*MOV124
- Residual Heat Removal Valve 2RHS*MOV142
- Residual Heat Removal Valve 2RHS*MOV22A
- Residual Heat Removal Valve 2RHS*MOV23A
- Residual Heat Removal Valve 2RHS*MOV32A
- Residual Heat Removal Valve 2RHS*MOV37A
- Residual Heat Removal Valve 2RHS*MOV80A
- Residual Heat Removal Valve 2RHS*MOV9A



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-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.

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Nine Mile Point Unit 2	05000410	99	011	00	03 OF 05

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

I. DESCRIPTION OF EVENT (Cont'd)

- Residual Heat Removal Valve 2RHS*SOV35A
- Residual Heat Removal Valve 2RHS*SOV36A
- Residual Heat Removal Valve 2RHS*SOV70A
- Residual Heat Removal Valve 2RHS*SOV71A
- Residual Heat Removal Valve 2RHS*MOV12A
- Residual Heat Removal Valve 2RHS*MOV149
- Residual Heat Removal Valve 2RHS*MOV22B
- Residual Heat Removal Valve 2RHS*MOV23B
- Residual Heat Removal Valve 2RHS*MOV32B
- Residual Heat Removal Valve 2RHS*MOV37B
- Residual Heat Removal Valve 2RHS*MOV80B
- Residual Heat Removal Valve 2RHS*MOV9B
- Residual Heat Removal Valve 2RHS*SOV35B
- Residual Heat Removal Valve 2RHS*SOV36B
- Residual Heat Removal Valve 2RHS*SOV70B
- Residual Heat Removal Valve 2RHS*SOV71B

II. CAUSE OF EVENT

The cause of the incomplete testing of 26 valves was misclassification of the valves due to a misapplication of NUREG-1482, Paragraph 2.4.2 and NRC Public Workshop on Inservice Testing (1997), Questions and Answers, as applied to American Society of Mechanical Engineers Section XI and ASME/ANSI OMa-1988 Addenda (ASME/ANSI OM-1987 Operation and Maintenance of Nuclear Power Plants), Part 10 Codes and Standards. These valves were incorrectly reclassified as passive based on the NUREG guidance that a valve need not be considered active if the valve is only temporarily removed from service or from its safety position for a short period of time. The classification of the 26 valves was made contrary to the design/license bases requirements.

III. ANALYSIS OF EVENT

This event is considered reportable under 10 CFR 50.73(a)(2)(i)(B), which requires a report for any operation or condition prohibited by the plant's Technical Specifications. NMPC identified 26 valves that are required to be tested in accordance with Technical Specification Surveillance Requirement 4.0.5 and were not correctly tested. Technical Specification Surveillance Requirement 4.0.5 requires inservice testing of all ASME Code Class 1, 2, and 3 components in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda.



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 (3)
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Nine Mile Point Unit 2	05000410	99	011	00	04 OF 05

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

III. ANALYSIS OF EVENT (Cont'd)

The reclassification of the valves to active in the Second Ten-Year Interval Inservice Testing Program Plan, results in a quarterly full-stroke exercise and stroke-time requirement. The 26 valves were full-stroke exercised quarterly or every refueling outage, but were not stroke-time tested since the valves were classified as passive (April 1998). All 26 valves successfully passed their stroke-time surveillance testing, which demonstrated that the valves would have been able to perform their safety function. Therefore, there was no adverse effect to the health and safety of the general public or plant personnel.

IV. CORRECTIVE ACTIONS

1. The valves were reclassified as active valves in the Second Ten-Year Inservice Testing Program Plan and were tested satisfactorily.
2. NMPC reviewed the current Nine Mile Point Unit 1 Ten-Year Interval Inservice Testing Program Plan for similar discrepancies. While Nine Mile Point Unit 1 does not have an active valve table in the Updated Final Safety Analysis Report, the Nine Mile Point Unit 1 valves that have similar functions to the 26 valves being reported were reviewed, and no classification errors were identified.
3. NMPC Management communicated expectations to individuals who misclassified 26 valves from the Second Ten-Year Interval Inservice Testing Program Plan on the importance of considering all design and license basis requirements and of maintaining consistency between the design/license bases and the Inservice Testing Program Plan.
4. NMPC will review for testing adequacy the approximately 150 valves in the Inservice Testing Program that are exempt from testing. In addition, NMPC will update the documentation for the approximately 150 valves previously reviewed that are classified as passive or had testing requirements reduced. These actions will be complete by November 30, 1999.

V. ADDITIONAL INFORMATION

- A. Failed components: None.



LICENSEE EVENT REPORT (LER)
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COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT
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FACILITY NAME (1) Nine Mile Point Unit 2	DOCKET NUMBER (2) 05000410	LER NUMBER (6)			PAGE (3) 05 OF 05
		YEAR 99	SEQUENTIAL NUMBER 011	REVISION NUMBER 00	

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

V. ADDITIONAL INFORMATION (Cont'd)

B. Previous similar events:

Licensee Event Report 99-08, "Inadequate Surveillance of Reactor Core Isolation Cooling Check Valve," required corrective actions that included the review of ASME Boiler and Pressure Vessel Code Section XI check valves to verify test method adequacy. This review identified a check valve that was previously in the First Ten-Year Interval Inservice Testing Program Plan, but was later inappropriately exempted from the Second Ten-Year Interval Inservice Testing Program Plan. This issue was reported in Licensee Event Report 99-09, "Nonconformance with Technical Specification Regarding ASME Section XI Class 2 Check Valve Reverse Flow Testing." The scope of the issue was assumed to include check valves only; therefore, the corrective actions from the Licensee Event Reports focused on check valves only.

C. Identification of components referred to in this licensee event report:

Components	IEEE 803A Function	IEEE 805 System ID
High Pressure Core Spray System	N/A	BG
Reactor Core Isolation Cooling System	N/A	BN
Residual Heat Removal System	N/A	BO
Motor Operated Valves	V	BG, BN, and BO
Solenoid Operated Valves	V	BO

