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 FACIL:50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha      05000410  
 AUTH.NAME      AUTHOR AFFILIATION  
 BOSNIC,D.      Niagara Mohawk Power Corp.  
 PECKHAM,M.F.      Niagara Mohawk Power Corp.  
 RECIP.NAME      RECIPIENT AFFILIATION

SUBJECT: LER 99-016-00:on 990624,TS action statement requirement was not performed for Div 1 & 2 DG.Caused by procedure deficiency.Revised procedure N2-OP-57.With 991004 ltr.

DISTRIBUTION CODE: IE22T      COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 5  
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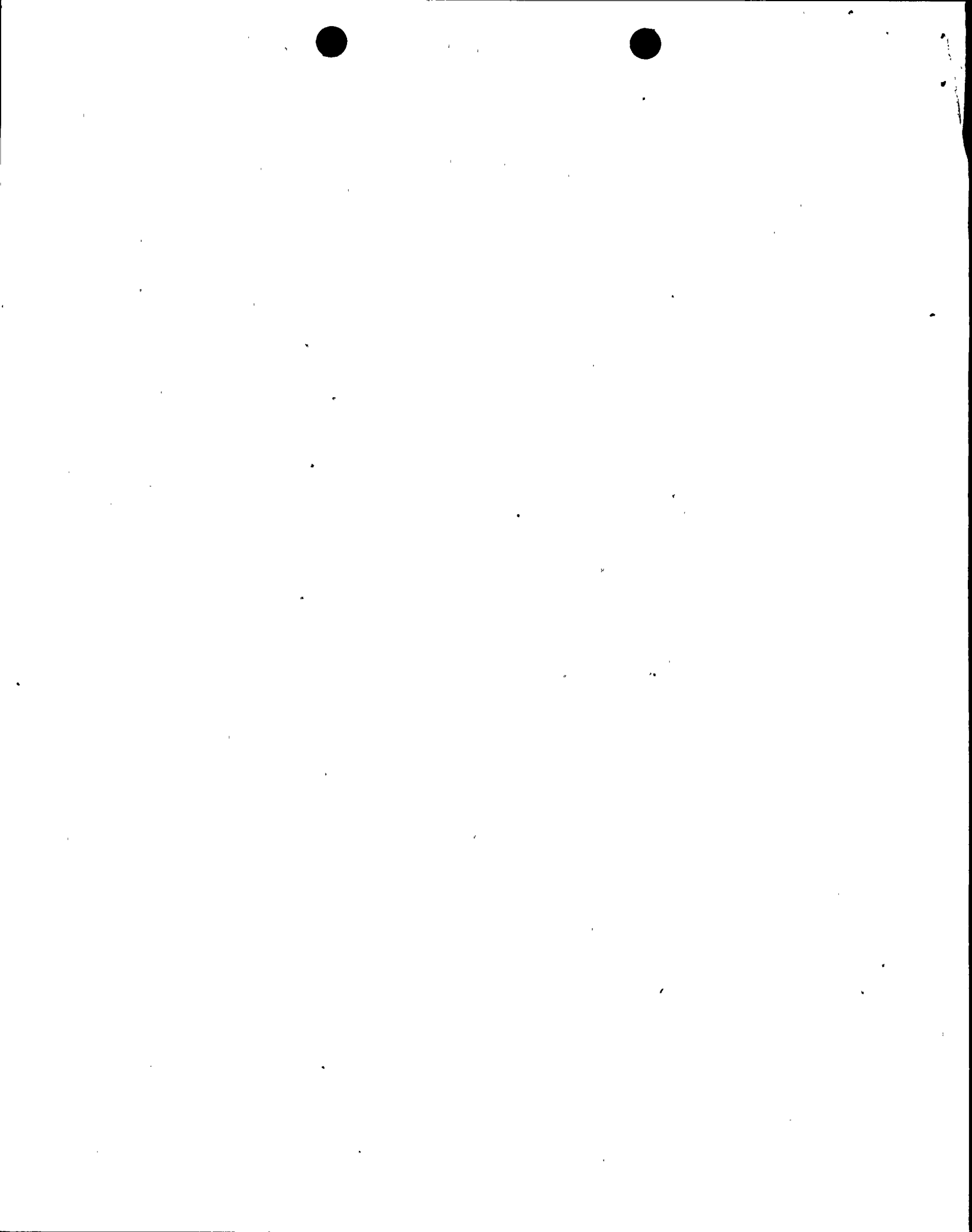
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October 4, 1999  
NMP2L 1903

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

RE: Docket No. 50-410  
LER 99-16

Gentlemen:

In accordance with 10CFR50.73(a)(2)(i)(B), we are submitting LER 99-16, "Technical Specification Action Statement Requirement Not Performed for the Division 1 and 2 Diesel Generators Due to a Procedure Deficiency."

Very truly yours,

A handwritten signature in black ink, appearing to read "M. F. Peckham".

Michael F. Peckham  
Plant Manager - NMP2

MFP/CES/kap  
Attachment

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

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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 04

TITLE (4)

Technical Specification Action Statement Requirement Not Performed for the Division 1 and 2 Diesel Generators Due to a Procedure Deficiency

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)	
06	24	99	99	016	00	10	04	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  
Don Bosnic - Manager Operations

TELEPHONE NUMBER

(315) 349-7952

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 September 2, 1999, Niagara Mohawk Power Corporation identified that on June 24, 1999, the Division 1 and 2 Diesel Generators were inoperable and the action statement requirement for Technical Specification 3.8.1.1.i was not performed while the plant was at 100 percent power.

The cause was inadequate technical review of design drawings prior to the implementation of a 1987 procedure change to Procedure N2-OP-57, "Diesel Generator Building Ventilation System," that permitted manual operation of the emergency exhaust fans to cool the diesel generator rooms when the diesel generators are not running.

Procedure N2-OP-57 was revised and a night order communicated this procedure change to all operating crews. This event will be reviewed with operations personnel responsible for procedure review, and training will revise licensed operator lesson plans to address proper emergency exhaust fan operation.



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	- 16	- 00	02 OF 04

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

## I. DESCRIPTION OF EVENT

On September 2, 1999, during the disposition of Deviation/Event Report 2-1999-2181, Niagara Mohawk Power Corporation identified that on June 24, 1999, the action statement requirement for Technical Specification 3.8.1.1.i was not performed when the Division 1 and 2 Diesel Generators were inoperable. The action statement for Technical Specification 3.8.1.1.i requires, in part, that within one hour, the breaker alignment is verified to be correct and electrical power is available to the operable electrical sources.

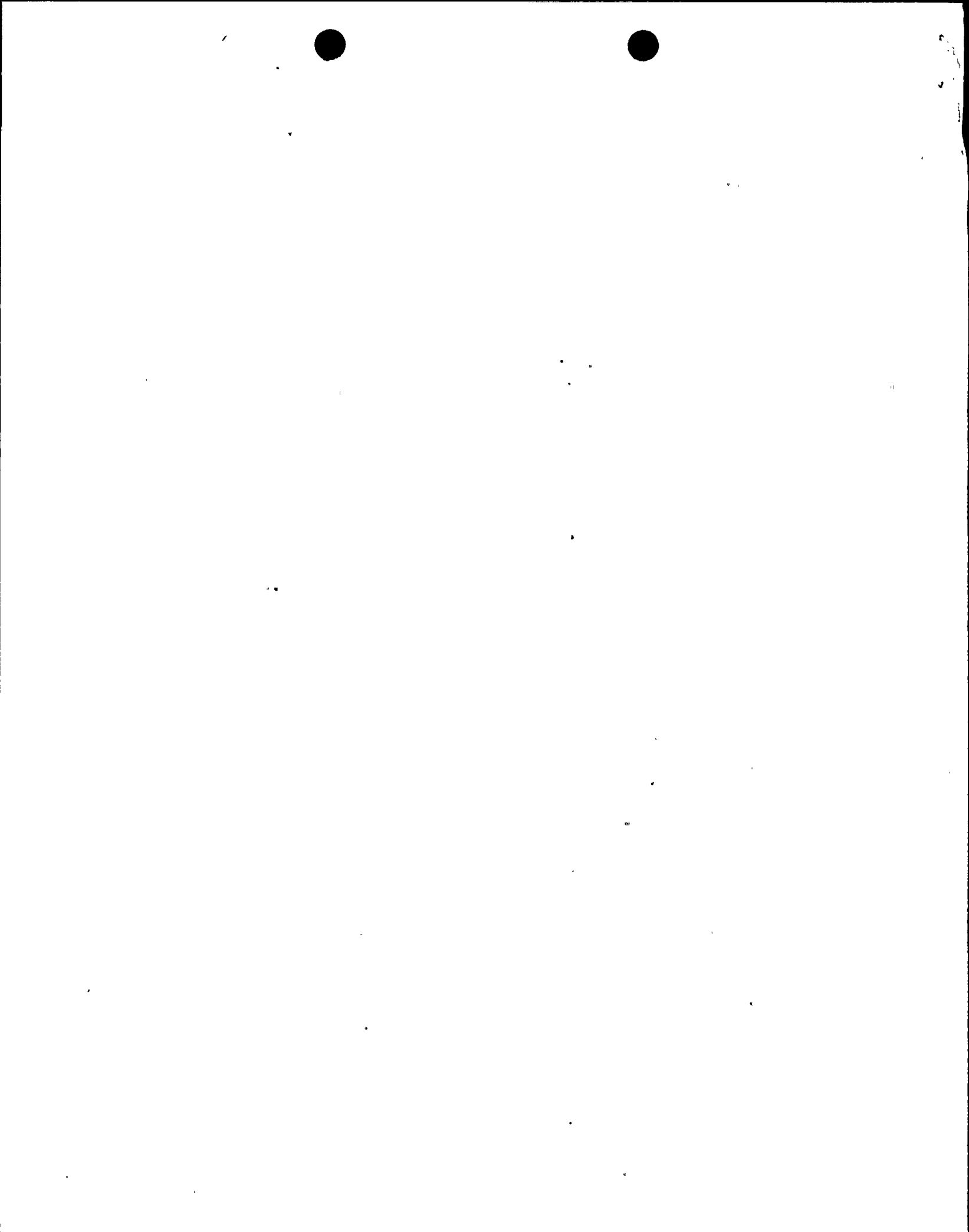
On June 23, 1999, one emergency exhaust fan was started in each of the Division 1 and 2 Diesel Generator rooms to lower room temperature when the diesel generators were not running as allowed by Operating Procedure N2-OP-57, "Diesel Generator Building Ventilation System." On June 24, 1999, with emergency exhaust fans still in service, the Nine Mile Point Unit 2 reactor scrammed and a loss of offsite electrical power from Line 5 occurred (Licensee Event Report 99-10). Following the loss of electrical power, the Division 1 Diesel Generator automatically started and re-energized the associated electrical bus. A technical support engineer identified that one emergency exhaust fan was running but the other fan, started on June 23 to lower room temperature, was not running.

Deviation/Event Report 2-1999-2181 was written to determine why the emergency exhaust fan was not running. During the deviation/event report disposition, a review of the associated design drawings revealed that these fans only automatically start if their control switches are in the Normal-After-Stop position. This design prevents the restart of a fan that had been previously running prior to the diesel generator start.

NMP2 calculation HVP-8, Revision 2, "Diesel Generator Rooms Ventilation," concluded that the maximum outdoor air temperature which requires only one exhaust fan to maintain the rooms within the maximum design condition is 78.3°F. As a result, procedure N2-OP-57 Step D.4.0, states that for the Division 1 and 2 Diesel Generators, one emergency fan is adequate to maintain diesel generator operability at outside air temperatures less than 77 degrees Fahrenheit, but both fans are required when outside air temperature is above 77 degrees Fahrenheit. Therefore, both the Division 1 and 2 Diesel Generators were inoperable on June 24, from 10:30 a.m., when the outside air temperature exceeded 77 degrees Fahrenheit until the fan was restarted for Division 1 and the temperature dropped below 77 degrees for Division 2 on June 24.

To determine the extent of condition, operations reviewed the start circuits of selected components in several systems. The systems were selected because they are periodically run during normal plant operation and are required to restart to support emergency operation. No similar start circuit problems were found during this review.

Operation of the emergency exhaust fans for room cooling has been a common practice since the procedural allowance was implemented in 1987. Based on the common practice of manually starting these fans for room cooling, Niagara Mohawk Power Corporation concluded that the associated Technical Specification requirements may not have been met in the past.





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-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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Nine Mile Point Unit 2	05000410	99	- 16	- 00	03 OF 04

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

**II. CAUSE OF EVENT**

The cause was inadequate technical review of design drawings prior to the implementation of a 1987 procedure change to Procedure N2-OP-57 that permitted manual operation of the emergency exhaust fans for room temperature adjustments.

**III. ANALYSIS OF EVENT**

This event is considered reportable under 10CFR50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

Each diesel generator room has an emergency ventilation system, designed to automatically maintain room temperature below the maximum design temperature of 125 degrees Fahrenheit when a diesel generator is running. The diesel generator is designed to provide onsite electrical power for the electrical loads necessary to safely shutdown the plant following a loss of coolant accident and loss of offsite power.

Procedure N2-APR-01, "Control Room Alarm Response Procedure," contains operator actions that would be taken for an alarm on high temperature (greater than 110 degrees Fahrenheit) in the diesel generator rooms. One of these operator actions is to verify proper operation of the emergency exhaust fans. The emergency exhaust fans could have been restarted from the control room, and thus prevented the diesel generator rooms from reaching the maximum design temperature.

The Technical Specification Surveillance Requirement 4.8.1.1.1 was performed at 5:04 a.m. and 4:45 p.m. on June 24, for other reasons and no discrepancies in the breaker lineup were identified.

Based on the facts listed above, the failure to perform the Technical Specification surveillance requirement within the time interval did not adversely affect the health and safety of the general public or plant personnel.

**IV. CORRECTIVE ACTIONS**

1. Procedure N2-OP-57 was revised to inform the operators that the diesel generators would be inoperable any time the emergency exhaust fan control switches are not in Normal-After-Stop position and the outside air temperature exceeds 77 degrees Fahrenheit.
2. A night order addressing proper emergency exhaust fan operation was provided to all operating shifts on September 14, 1999.
3. This licensee event report will be reviewed with all operations personnel responsible for procedure review by October 29, 1999.
4. Training will revise licensed operator lesson plans to describe the emergency exhaust fan control circuit with emphasis on the impact of leaving the control switch in the Normal-After-Start position on the operability of the associated diesel generator with elevated outside air temperatures by October 29, 1999.



LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATIONESTIMATED 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  
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Nine Mile Point Unit 2	05000410	99	- 16	- 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:

LER 99-15, "Inadvertent Start of Division I Diesel Generator Due to Personnel Error," involved actions by individuals without fully considering the impact on the plant. This event occurred after the procedure change that caused the LER 99-16 event. The corrective actions focused on individual behaviors, and therefore, would not have identified this procedure deficiency.

LER 98-13, "Engineered Safety Actuation Due to Personnel Error," involved re-energizing circuits without fully considering the impact on the plant. This event occurred after the procedure change that caused the LER 99-16 event. The corrective actions focused on tagout issues and abnormal circumstances, and therefore, would not have identified this procedure deficiency.

LER 97-11, "Technical Specification Violation of APRM Testing Requirements," involved inadequate testing due to individuals not recognizing the unique design of the affected circuits. This event occurred after the procedure change that caused the LER 99-16 event. The corrective actions focused on instrumentation and testing, and therefore, would not have identified this procedure deficiency.

C. Identification of components referred to in this Licensee Event Report:

Components	IEEE 803A Function	IEEE 805 System ID
Diesel Generator	DG	EK
Breaker	BKR	FK
Electrical Bus	BU	EA
Diesel Generator Ventilation System	N/A	VJ
Exhaust Fans	FAN	VJ
Control Switch	33	VJ
Diesel Generator Room	N/A	NB
Alarm	ALM	IB

