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JOHN T. CONWAY
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December 29, 1997
NMP1L 1278

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

*Subject: Reply to Notice of Violation as Contained in NRC Inspection Report
50-220/97-07 and 50-410/97-07*

Gentlemen:

Niagara Mohawk Power Corporation's reply to the subject Notice of Violation is enclosed in the Attachment to this letter. Much of the information provided with respect to violation 97-07-03 was previously provided to the NRC in Nine Mile Point Unit 2 Licensee Event Report 97-07, which was submitted on September 12, 1997. We do not dispute these violations.

Very truly yours,

John T. Conway
Vice President - Nuclear Engineering

JTC/GJG/cmK
Attachment

xc: Mr. H. J. Miller, Regional Administrator, Region I
Mr. A. W. Dromerick, Acting Director, Project Directorate I-1, NRR
Mr. B. S. Norris, Senior Resident Inspector
Mr. D. S. Hood, Senior Project Manager, NRR
Records Management

4201: 1213



ATTACHMENT

**NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT UNIT 1 AND UNIT 2
DOCKET NO. 50-220/50-410
DPR-63/NPF-69**

**"REPLY TO NOTICE OF VIOLATION," AS CONTAINED IN
INSPECTION REPORT 50-220/97-07 AND 50-410/97-07**

A. VIOLATION 50-220/97-07-02

(1) NMP1 Technical Specifications (TS) Surveillance Requirement 4.6.2.a requires sensors and instrument channels to be checked, tested, and calibrated at least as frequently as listed in Tables 4.6.2.a to 4.6.2.1.

NMP1 TS, Table 4.6.2.1, requires an instrument channel calibration to be performed once each operating cycle, not to exceed 24 months, for the control room ventilation radiation monitor.

Contrary to the above, as of August 18, 1997, the control room ventilation radiation (CRVR) monitor channel #11 had not been calibrated within the previous 24 months. The CRVR monitor was last calibrated on August 3, 1995.

I. THE REASON FOR THE VIOLATION

On August 18, 1997, while preparing to perform a quarterly calibration of CRVR monitor #11, the radiation protection technician reviewing the Radiation Protection (RP) Calibration Maintenance History Log (a department record of radiation monitor calibration and maintenance history) discovered that the CRVR monitor #11 channel calibration had been last performed on August 3, 1995. An immediate review of procedure records confirmed the last channel calibration to be greater than 24 months old.

Investigation of this deviation has determined that on April 24, 1996, following corrective maintenance (detector replacement) and channel calibration of CRVR monitor #12, the Preventive Maintenance/Surveillance Test (PM/ST) database was erroneously updated to reflect the CRVR monitor #11 channel calibration having been performed rather than the CRVR monitor #12 channel calibration.

The exact reason for the erroneous PM/ST database update could not be determined, but it is concluded that either the incorrect PM/ST update data sheet was manually generated (containing the incorrect equipment piece number) and completed by the technician and approved by the RP supervisor, or a data entry error was made and not identified by



independent verification when the computer database was updated. Because the update data sheet was not retained in permanent plant files (data sheets generated for other than regularly scheduled surveillances were routinely discarded after being used to update the PM/ST computer database), it is indeterminable as to whether the correct data sheet was generated. In either case, the cause of the deviation, and hence this violation, is personnel error due to inattention to detail and inadequate self checking.

II. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The following corrective actions were taken when NMPC discovered the missed TS Surveillance Requirement:

1. Technical Specification (TS) 3.6.2.a was reviewed for impact on operability of the Control Room Ventilation System. It was determined there was no impact since only one (1) ventilation radiation monitor is required per TS Table 3.6.21, which was fulfilled by CRVR monitor #12 at the time.
2. Channel calibration of CRVR monitor #11 was completed on August 20, 1997.
3. CRVR monitor #12 was verified to have been operable for the period of August 3, 1997 through August 20, 1997, the period of inoperability of CRVR monitor #11.
4. A comparison of Radiation Protection Calibration Surveillance completion dates in PM/ST with completion dates in the Radiation Protection Calibration maintenance history log was completed. There were no other discrepancies identified.

III. ACTIONS TAKEN TO PREVENT RECURRENCE

The following actions have been taken to prevent recurrence:

1. Following the determination of the possible causes of this event, the Radiation Protection Manager discussed the importance of self checking with the department supervisors when reviewing work. Additionally, the Radiation Protection Calibration Supervisor discussed this event with the equipment technicians and clerical staff, and reinforced the importance of attention to detail and self checking when completing PM/ST data sheets and inputting the data into the computer database.
2. The Manager, Work Control/Outage Management briefed the PM/ST scheduling specialist on the importance of attention to detail when reviewing PM/ST data sheets and database entries.



3. This event will be reviewed with all departments at Nine Mile Point Units 1 & 2 that have surveillance program responsibilities. This action will be completed by February 28, 1998.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on August 20, 1997 when CRVR monitor #11 was successfully calibrated and restored to service.



B. VIOLATION 50-410/97-07-03

(2) NMP2 TS Surveillance Requirement 4.6.6.1.b.1 requires the calibration of all hydrogen recombiner system instrumentation at least once every 18 months.

Contrary to the above, as of August 13, 1997, eight hydrogen recombiner system instruments had not been calibrated since the initial operation of NMP2 in July 1987.

I. THE REASON FOR THE VIOLATION

During a review of electrical schematic drawings and corresponding TS Surveillance Requirements (SR), NMPC determined that eight instruments (four instruments in each division) had not been calibrated as required by TS. A review of test procedure development history revealed that the control portions of the instrument loops were calibrated during initial construction in 1986 as part of the original loop calibration reports, which were used to establish the "as-built" data. When the corresponding calibration procedure was written and later issued in 1986, it did not include provisions to calibrate the control portions of these instrument loops. The subsequent two full revisions of the procedure (1987 and 1992) did not identify the missing test requirements. These full revisions should have identified the inadequate procedure.

The root cause of the event was inadequate written communications when the procedure was initially developed in that the control portions of these instrument loops were omitted. A contributing cause was poor work practices in that the deficiency was not identified during the subsequent full revisions of the procedure.

II. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

1. Both divisions of the Hydrogen Recombiner System (HCS) were declared inoperable. TS Limiting Condition for Operation (LCO) 3.0.3 was entered but actions were delayed based on TS SR 4.0.3, which allows delaying the Action requirements for up to 24 hours to permit the completion of the surveillance.
2. The surveillance procedure was revised to incorporate calibration of the control portions of instrument loops 2HCS*TE20A and 20B. Testing was completed and verified that all circuits were within their required tolerances and were capable of performing their intended design functions.



III. ACTIONS TAKEN TO PREVENT RECURRENCE

NMP2 is currently reviewing logic circuits based on the commitments made in our April 18, 1996 and August 14, 1996 letters to the NRC in response to GL 96-01. One of the actions is to compare electrical schematic drawings and logic diagrams to plant surveillance procedures to ensure that TS requirements are met. It was via these ongoing review activities that this deficiency was identified.

Similar reportable deficiencies in the technical content of surveillance procedures have been previously identified. Preventive actions implemented previously that address this type of discrepancy were described in LER 94-003. These actions included specific program upgrades and included the following procedurally controlled programs:

- NIP-SEV-01, Applicability Reviews and Safety Evaluations
- NIP-PRO-03, Preparation and Review of Technical Procedures
- PWM-PRO-0105, Technical Procedure Verification and Validation

These procedural enhancements, as well as general management emphasis regarding the level of detail of these reviews, provide added assurance that procedures are technically accurate and adequate.

Another activity that is pertinent to this violation is the "Back to Basics" training that was held with various site departments in 1995 and 1996. Although this training was not directly related to this violation, the aspects of compliance with the design and licensing basis, the need for heightened awareness and attention to detail during work activities, and the importance of a questioning attitude were addressed and will also provide added assurance of procedure accuracy. Therefore, no further corrective or preventative actions are required at this time.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on August 14, 1997, after both divisions of HCS were successfully tested and declared operable.

