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SUBJECT: Responds to NRC 910329 ltr re violations noted in Insp Rept 50-410/91-80 on 910128-0201. Corrective actions: Procedure N2-EOP-5 re production & control of util EOP revs will be rewritten to provide more specific guidance:

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B. Ralph Sylvia
Executive Vice President
Nuclear

May 3, 1991
NMP2L 1298

**U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555**

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

Gentlemen:

Attached is Niagara Mohawk Power Corporation's (NMPC's) response as requested in Inspection Report Number 50-410/91-80, dated March 29, 1991.

Sincerely,

B. Ralph Sylvia
B. Ralph Sylvia

Exec. Vice President - Nuclear

/bwr
NMP

pc: Regional Administrator, Region I
Mr. W. A. Cook, Sr. Resident Inspector
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A special safety inspection was conducted by the NRC Emergency Operating Procedure Inspection Team from January 28 to February 1, 1991 at the Nine Mile Point Nuclear Station, Unit 2 (NMP2). The results of the inspection were provided as Emergency Operating Procedures Inspection and Initial Examination-Report No. 50-410/91-80.

In this report, the inspection team concluded that the NMP2 Emergency Operating Procedures (EOPs) are technically correct, can be physically carried out in the plant, and can be implemented by the plant staff. The report also identified some technical and human factors problems. Niagara Mohawk was requested to respond, in writing, identifying the action taken or planned to address: (1) The adequacy of the justification for not including main steam tunnel temperature as an entry condition to EOPs; (2) The access restriction in the Reactor Water Clean Up (RWCU) precoat filter room that could hinder implementation of emergency procedures for alternate boron injection; (3) The weaknesses in the Verification and Validation (V&V) program that resulted in deficiencies in the EOP support procedures.

The requested information is provided below:

1. Adequacy of the Justification for Not Including Main Steam Tunnel Temperature as an Entry Condition to EOPs

Main steam tunnel temperature is not included as an entry condition to N2-EOP-SC, "Secondary Containment Control", since the main steam tunnel is not part of secondary containment. The NRC staff questioned this because one of the purposes of Secondary Containment Control is to limit the reactivity release from secondary containment, and a steam line break in the main steam tunnel would bypass secondary containment and could result in a radioactive release. The NRC concluded that elevated main steam tunnel temperatures are indicative of a problem that should be addressed by an EOP.

Actions Taken:

The need to add the main steam tunnel temperature as an entry condition to N2-EOP-SC or N2-EOP-RR, "Radioactivity Release Control", was reviewed by Operations Department management. A walk-through of the secondary containment EOP using main steam line tunnel high temperature as an entry condition, has demonstrated that its inclusion makes the procedure cumbersome, primarily because the steam tunnel is not a part of secondary containment, and therefore, the majority of the actions do not apply.



Under the current EOPs, should the high temperature condition or any other steam line break indications (e.g., high flow, low pressure, high delta temperature) be the result of a steam line break or rupture, procedure N2-EOP-RR will be entered when the stack Gaseous Effluent Monitor (GEM) reaches its alarm point. This procedure provides appropriate guidance regarding control of offsite releases.

The current Reactor Pressure Vessel (RPV) control EOP (N2-EOP-RPV) will also be entered for steam line breaks if RPV level reaches the scram setpoint. This procedure, as well as alarm response procedures, provides guidance on verifying main steam isolation valve (MSIV) and main steam line drain isolation.

For these reasons, NMPC has concluded that it is not appropriate to add this symptom as an entry condition to NMP2 EOPs.

2. Access Restriction in the RWCU Precoat Filter Room That Could Hinder Implementation of Emergency Procedures for Alternate Boron Injection

During a walkdown of N2-EOP-6 Attachment 19, "RWCU Boron Injection", the inspection team noted that access to the RWCU precoat room is severely restricted by tanks, pipes, and valves. Approximately half of this equipment is no longer used. A modification had been developed to remove the obsolete equipment, and NMPC agreed to consider upgrading the modification for earlier implementation.

Actions Taken:

NMPC has reviewed the priority of this modification and concluded that its priority level, based upon the merit rating system, is appropriate.

The modification had previously been designated as a Priority 3 utilizing Nuclear Division Procedure NDP-34.00, "Integrated Priority System". Based on this priority, the work is not part of the 1991 work schedule. NMP2 management reviewed this priority classification and determined it to be appropriate, noting that plant operators have demonstrated the ability to perform alternate boron injection in the RWCU Room. In accordance with our priority system procedure, Priority 3 work is periodically reviewed for concurrence with the assigned priority.



3. Weaknesses in the V&V Program that Resulted in Deficiencies in the EOP Support Procedures

The inspection team identified a number of deficiencies in the EOP support procedures that indicated a weakness in the Verification and Validation (V&V) program.

Actions Taken:

Procedure N2-EOP-6, "NMP2 EOP Support Procedure", consists of a series of attachments referred to as the EOP Support Procedures. Those specifically identified deficiencies in N2-EOP-6 which could be readily addressed in the short term (e.g., typos, moving of notes, rewording, correcting technical deficiencies, adding jumper numbers, adding jumper use locations, and adding restoration steps) have been corrected. The remaining specific deficiencies are being tracked to completion on the NMPC Nuclear Commitment Tracking System.

Actions Planned:

Procedure N2-EOP-5, "Production and Control of NMP2 EOP Revisions", contains the EOP Writers Guide, and the Verification and Validation Programs. The longer-term planned action is to rewrite N2-EOP-5; with specific emphasis on the EOP support procedure section. This section will include more specific guidance regarding the following:

- * structure and content for text procedures
- * requirements regarding consistency with plant labeling
- * standardization of component identification
- * standardization and scope of restoration steps
- * requirements regarding inclusion of component location
- * format for notes and cautions
- * use of references to normal operating procedures
- * methods to identify required tools

A verification checklist will be developed for support procedures and the existing validation checklist reworked to meet the requirements of the rewritten N2-EOP-5 section.

When N2-EOP-5 is revised, N2-EOP-6 will then be rewritten, verified, and validated. These actions are scheduled to be completed by the end of the second refueling outage.

