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February 6, 1989

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

Re: Docket No. 50-410
SPECIAL REPORT

Gentlemen:

In accordance with the Nine Mile Point Unit 2 (NMP2) Technical Specification (TS) 3.3.7.2, ACTION statement a., we are submitting the following Special Report concerning the inoperability of the Seismic Monitoring Instrumentation (Specifically - the Triaxial Peak Accelerograph, High Pressure Core Spray Piping).

EXECUTIVE SUMMARY

The Triaxial Peak Accelerograph (located on the High Pressure Core Spray (CSH) Piping) is installed and maintained as required by the NMP2 TS. This unit has indications of high seismic accelerations in its present location due to non-seismic events. Thus, no TS credit is being taken for this unit.

This triaxial peak accelerograph is being mounted in an alternate location designated by Niagara Mohawk Power Corporation (NMPC) Engineering. This unit is expected to function properly and provide information on seismic activity. The selected location is not the location specified in the NMP2 TS. Thus, NMPC is not taking credit for meeting TS requirements with this accelerograph.

NMPC plans to identify an acceptable location for this accelerograph and to make the appropriate hardware and TS changes by the end of the first refueling outage.

EVENT DESCRIPTION

On December 27, 1988 at 1647 hours with the reactor in cold shutdown (Operational Condition 4), reactor coolant at approximately 163 degrees Fahrenheit and atmospheric pressure, the CSH Triaxial Peak Accelerograph (2ERS-PAC2B) was declared inoperable. It was found inoperable during the performance of procedure N2-ISP-ERS-R102 (Operating Cycle Channel Calibration of Seismic Monitoring Triaxial Peak Accelerographs Instrument Channels). The vertical (v), transverse (t), and longitudinal (l) permanent record plates were found to have indications that did not result from seismic activity.

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CAUSE OF THE EVENT

The cause of the indications on the v, t, l record plates is unknown. It is hypothesized that the instrument was struck by personnel installing insulation on the pipe or performing system walkdowns.

ACTIONS TAKEN

A Problem Report (PR) was written on January 12, 1989 for the indications on the v, t, l permanent record plates. The PR was written to have NMPC Engineering consider relocating 2ERS-PAC2B. The PR's Description states that: During performance of TS required surveillances it was discovered that all record plates had two to four gravity accelerations (2 to 4g's) marks scribed on them. This marking is the product of background noise. This noise is of such a magnitude that had there been a design basis earthquake, it would not have been observable on the permanent record plates.

NMPC Engineering determined that CSH has been operated approximately twice during the time that the 2ERS-PAC2B was installed. (Inspection of the record plate etchings of 2ERS-PAC2B also indicate 2 or 3 cycles). Engineering also determined that the recorded 2 to 4g's (during these 2 or 3 cycles) were not the result of CSH operation. This determination is based on the following observations:

CSH piping is filled with water at all times, including portions of the piping downstreams of the check valve 2CSH*AOV108. Analyzed conditions, for all non-seismic transients, show accelerations less than 0.8 g in all directions.

Pre-operation testing and the power ascension vibration program, both produced satisfactory results on the same piping where the instrument is presently located.

A test has been performed in the Instrument & Control (I&C) shop by engineering and I&C. 2ERS-PAC2B was firmly mounted with fresh record plates and lightly tapped in all three directions with a human fist. The results were measurements up to 4 g's in each direction. This demonstrates the consequences had the instrument been accidentally struck by personnel installing insulation on the pipe or performing system walkdowns in the area.

NMPC Engineering will develop a temporary modification to move 2ERS-PAC2B to the CSH line just outside the primary containment penetration and just up stream of the CSH injection valve (2CSH*MOV107) on the 292 foot elevation of the NMP2 Secondary Containment. The I&C technicians will periodically examine the record plates (at 3 months and again at 6 months) to determine if this location has an acceptably low level of background vibration. It is expected to be acceptable. If it turns out to be so, 2ERS-PAC2B will remain at this location and a Technical Specification change will be submitted to the Nuclear Regulatory Commission to change Table 3.3.7.2-1, item 2.b to reflect this new location. If it is not satisfactory, then another new location will be found.

We expect to complete this process of determining the new location, making necessary hardware changes and submitting a TS change before the end of the first refueling outage.

Sincerely,

J. L. Willis
General Superintendent
Nuclear Generation

JLW/AD/cjm
(1598u)

xc: Regional Administrator, Region 1
W. A. Cook, Resident Inspector