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SUBJECT: Responds to NRC 930803 ltr re violations noted in insp rept  
 50-410/93-14. Corrective actions: util initiated plan for  
 restructuring operating procedures by developing special  
 operating procedures category.

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# NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/NINE MILE POINT, P.O. BOX 63, LYCOMING, NY 13093/TELEPHONE (315) 349-2882

B. Ralph Sylvia  
Executive Vice President  
Nuclear

September 3, 1993  
NMP89316

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

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

Gentlemen:

**SUBJECT: REPLY TO NOTICE OF VIOLATION - NRC INSPECTION REPORT  
50-410/93-14**

Enclosed is Niagara Mohawk Power Corporation's reply to the Notice of Violation contained in the subject Inspection Report dated August 3, 1993. The discussion, as requested by the Inspection Report, of Niagara Mohawk's position with respect to compliance with ANSI/ANS 3.2-1982, Section 5.3.9.1 is also enclosed. This letter also provides additional information, as requested, regarding the quality of the Nine Mile Point Unit 2 Operating Procedures.

### Violation Response

We believe that the response to the Notice of Violation (Enclosure 1) appropriately addresses the causes of this violation and presents appropriate corrective actions which will prevent recurrence.

### Off-Normal Procedure Format

Enclosure 2 provides Niagara Mohawk's position with respect to the issue of off-normal procedure format. The Inspection Report indicated that our resolution of the issue regarding procedure format has not been timely. We acknowledge that, until this inspection, we misinterpreted the focus of this issue, believing the concern to be the quality of selected Operating Procedures, which we were addressing by upgrading the Electrical Operating Procedures and enhancing our procedure preparation processes. We discussed our position regarding this issue with the NRC Region Staff during the on-site inspections covered by this report.

Furthermore, as discussed in Enclosure 2, Niagara Mohawk has initiated a plan for a significant restructuring of Unit 2 Operating Procedures (OPs) by developing procedures in a new category, Special Operating Procedures (SOPs). The Unit 2 SOPs will incorporate, as appropriate, the attributes of symptoms, automatic actions, immediate and subsequent operator actions. In an August 6, 1993 letter to the Regional Administrator, Mr. T. Martin, we described this plan and provided our implementation schedule. As discussed in our letter, implementation of this plan will be complete by July 31, 1994 in accordance with a structured schedule which will allow adequate time for verification and training.

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This Inspection Report noted that several events in the potential emergency category were not being addressed by our proposed SOPs. These events were not included in the SOP plan described in our August 6, 1993 letter. Niagara Mohawk has since decided to expand the scope of our SOP development effort to address the events listed in Regulatory Guide 1.33, Appendix A, Section 6, applicable to the Nine Mile Point Unit 2 design except for a very limited number of events which are more appropriately addressed by our symptom based Emergency Operating Procedures or our Emergency Plan Procedures. The events identified in the Inspection Report will be incorporated into the SOPs within the time frame identified in our August 6, 1993 letter. Niagara Mohawk will revise the USAR to clearly describe our procedure hierarchy and our commitments to ANSI/ANS-3.2 1982.

Operating Procedure Quality

The Inspection Report notes that there appears to be a persistent problem with the quality of Unit 2 Operating Procedures (OPs) and expresses concern that our upgrade program may not be effective in dealing with this problem. Our evaluation of the violation indicates a weakness in the implementation of our procedure preparation and review process. We will establish additional management controls as described in Enclosure 1 in order to improve the effectiveness of the Unit 2 Operating Procedure upgrade activities.

Over 2,900 site administrative and technical procedures have been upgraded, however, the majority of the Unit 2 OPs were not included. We are continuing with our longer term effort to upgrade the remaining OPs.

Nine Mile Point Unit 2 experience indicates that continued attention to improvement of the OPs is appropriate. Niagara Mohawk believes, however, that the improvement in recent operating performance demonstrates the operators' ability to effectively use the currently existing procedures.

Summary

Niagara Mohawk believes that the SOP development plan discussed above and the corrective actions discussed in Enclosure 1 will significantly enhance the Unit 2 procedure program.

If you have any questions concerning these matters, please contact me.

Very truly yours,



B. Ralph Sylvia  
Exec. Vice President - Nuclear

BRS/AFZ/lmc  
Enclosures

xc: Mr. T. T. Martin, Regional Administrator, Region I  
Mr. W. L. Schmidt, Senior Resident Inspector  
Mr. R. A. Capra, Director, Project Directorate I-1  
Mr. J. E. Menning, Project Manager, NRR  
Records Management



ENCLOSURE 1

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 2

DOCKET NO. 50-410

NPF-69

"REPLY TO NOTICE OF VIOLATION," AS CONTAINED IN  
INSPECTION REPORT 50-410/93-14

VIOLATION 50-410/93-14-01

10 CFR 50 Appendix B, Criterion VI, on document control requires in part that measures shall assure that documents, such as procedures, including changes, are reviewed for adequacy.

Contrary to the above, as of July 8, 1993, an operating procedure change was not reviewed for adequacy in that OP-71D would have permitted both logic trains of the Automatic Depressurization System to be made inoperable during restoration of one power supply train.

This is a Severity Level IV violation (Supplement 1).

1. THE REASONS FOR THE VIOLATION

A limited revision to procedure N2-OP-72 (OP-72) was written in August 1992 to address a loss of power to loads supplied from 2VBA-UPS2B (UPS2B). This procedure was prepared to support a corrective maintenance activity performed in September 1992. The steps for restoring power to the UPS2B loads were extracted from procedure N2-PM-@13, which had been previously demonstrated to be effective for de-energizing and restoring Division II power supplies.

While developing the limited revision to OP-72, the provisions for the use of the Automatic Depressurization System (ADS) inhibit switches was erroneously added as an alternative to opening breaker 2BYS\*PNL201B-10. This error was not identified by the Qualified Technical Reviewer. Subsequently, procedure N2-OP-71D (OP-71D) was developed as part of the Electrical OP upgrade program. The section on restoring power to UPS2B loads was transferred from OP-72 to OP-71D when the upgraded Electrical OPs were implemented. OP-71D received a cross-disciplinary and technical review prior to the addition of the section on restoring power to UPS2B loads. The review by the Qualified Technical Reviewer, after incorporating this section from OP-72, did not identify the error.

The primary cause for the incorrect procedure has been determined to be inadequate managerial methods in that procedure program requirements and management expectations regarding procedure preparation and review activities were not well understood by the individuals involved. In addition, management oversight was less than adequate in identifying that these expectations were not well understood.





The procedure section addressing the restoration of UPS2B loads has never been used. Furthermore, had this procedure been used, the internal inconsistency resulting from the erroneous step would in all likelihood have resulted in an operator decision to stop the procedure and to initiate action to resolve the discrepancy. Additionally, operation of the ADS inhibit switches would have initiated Control Room front panel annunciators, alerting the operating shift of the need to take action to restore ADS operability.

## **2. CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED**

An immediate Procedure Change Evaluation (PCE) was issued in response to the Inspector identified procedure deficiency. This PCE removed the option to use the ADS switches during the performance of this procedure.

Deviation Event Report (DER) #2-93-1611 was issued on July 8, 1993, to document the evaluation of the cause of this procedure deficiency and corrective actions.

A sample of previously revised Operations Department procedures is being reviewed for technical accuracy. The results of that review will be presented to the Site Operations Review Committee (SORC) for consideration in determining whether additional corrective actions are warranted. A sample of one procedure per Qualified Technical Reviewer will be reviewed in the initial sample. At this time eight upgraded Operations Department procedures have been reviewed with no errors in technical content identified. These reviews did identify some editorial errors.

## **3. CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS**

Niagara Mohawk will continue upgrading our Unit 2 OPs on a prioritized basis. Senior Operations Department Supervision (General Supervisor level or higher) will review selected revised procedures prior to publication with the procedure author and Qualified Technical Reviewer to ensure the procedure preparation and review activities were performed in full compliance with program requirements and management expectations.

Operations Line Management will reinforce, with procedure authors and Qualified Technical Reviewers, the expectations and requirements for proper procedure preparation and Technical Review activities.

The Operations Branch Manager will meet with all Operations Department personnel to reinforce Nuclear Division Standards of Performance and expectations regarding the emphasis on safety and quality of work having priority above schedule adherence as well as reinforcing management expectations on procedure preparation and review activities.

Training to emphasize the roles and responsibilities of Technical Reviewers will be included in the Technical Staff and Reactor Operator continued training programs.

Augmented Quality Assurance surveillance activities will be utilized to monitor the effectiveness of future Operations Department procedure revision activities. These surveillance activity results will be fed back to Operations Department Management to gauge the effectiveness of the corrective actions taken.



4. *DATE WHEN FULL COMPLIANCE WAS ACHIEVED*

Full compliance was achieved on July 8, 1993, when an immediate PCE was issued to remove the option to use the ADS switch during the performance of this procedure.



## ENCLOSURE 2

### NIAGARA MOHAWK POWER CORPORATION

#### NINE MILE POINT UNIT 2

DOCKET NO. 50-410

NPF-69

### NIAGARA MOHAWK POSITION ON FORMAT OF OFF-NORMAL PROCEDURES

#### INTRODUCTION

Based upon the comments in Inspection Report 93-14, it appears that Niagara Mohawk and the NRC Staff have different positions regarding the required format for "off-normal" procedures.

This Enclosure discusses Niagara Mohawk's position on this issue.

#### LICENSING BASIS

Niagara Mohawk believes that the current Unit 2 procedure program is in compliance with ANS 3.2-1982. In Section 13.5 of the USAR, Niagara Mohawk commits to follow Section 5.3 of ANS 3.2-1982. In subsequent subsections, however, we note that our EOPs will follow Rev. 4 of the BWROG format for symptom based EOPs. This position is consistent with footnote 13 to Section 5.3.9.1 of ANS 3.2.

ANS 3.2 Section 5.3.9.2, which requires procedures to respond to potential emergencies, does not specify a particular format. At the time the Unit 2 OPs were initially prepared, they followed the general format, style and content then being used by the existing Unit 1 procedures. Furthermore, Niagara Mohawk specifically decided to incorporate off-normal actions within the OPs to minimize the number of procedures that operators would need to reference. The potential emergencies discussed in Section 5.3.9.2 and Appendix A10 of ANS 3.2 are covered by the off-normal section of our OPs or by other approved site procedures.

Subsequent experience, however, has demonstrated the desirability of having stand alone procedures for responding to selected operating events. As discussed below, we have developed a comprehensive plan to develop these stand alone procedures and provided this information to the NRC in our August 6, 1993, letter to the Region I Administrator.

#### OFF-NORMAL PROCEDURE PLAN AND STATUS

Niagara Mohawk's plan is to develop a new set of Unit 2 procedures called Special Operating Procedures, SOPs, which will cover events of potential emergency. As these SOPs are prepared, the appropriate off-normal sections of our current OPs will be modified.

We are developing a writer's guide for SOPs and the Operations Staff is developing the format best suited for SOPs. In some cases, this may result in the use of flow-chart type procedures,



similar to the EOPs. Regardless of the format, the attributes of symptoms, automatic actions, immediate and subsequent operator actions, will be incorporated in the individual procedures. Incorporating these attributes may not necessarily involve specific procedure sections with the above headings. For example, automatic actions may be incorporated as a verification step at the appropriate time within the immediate or subsequent operator action sections. The USAR will be revised to reflect the revised procedure program.

**SUMMARY**

Niagara Mohawk believes that the existing Unit 2 procedure program is in compliance with the licensing basis, however, Niagara Mohawk will revise the USAR to more clearly and specifically describe our procedure program and commitment to ANS 3.2. We have also concluded that a set of Special Operating Procedures would be an enhancement to our program and have developed a plan to implement that approach.

