

CATEGORY

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9612030198 DOC.DATE: 96/11/22 NOTARIZED: NO DOCKET #
FACIL:50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Powe 05000220
50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
AUTH.NAME AUTHOR AFFILIATION
ABBOTT,R.B. Niagara Mohawk Power Corp.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 961115 ltr re violations noted in insp repts
50-220/96-07 & 50-410/96-07. Corrections to surveillance test
database frequency codes to ensure identified surveillances
were performed during refueling outage.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD1-1 PD	1 1	HOOD,D	1 1
INTERNAL:	ACRS	2 2	AEOD/SPD/RAB	1 1
	AEOD/TTC	1 1	DEDRO	1 1
	<u>FILE CENTER</u>	1 1	NRR/DISP/PIPB	1 1
	NRR/DRCH/HHFB	1 1	NRR/DRPM/PECB	1 1
	NRR/DRPM/PERB	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS3	1 1
	RGN1 FILE 01	1 1		
EXTERNAL:	LITCO BRYCE,J H	1 1	NOAC	1 1
	NRC PDR	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS
OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL
DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 19 ENCL 19

C
A
T
E
G
O
R
Y
I
N
F
O
R
M
A
T
I
O
N





NIAGARA MOHAWK

GENERATION
BUSINESS GROUP

NINE MILE POINT NUCLEAR STATION/LAKE ROAD, P.O. BOX 63, LYCOMING, NEW YORK 13093/TELEPHONE (315) 349-1812
FAX (315) 349-4417

November 22, 1996
NMPIL 1161

RICHARD B. ABBOTT
Vice President and
General Manager - Nuclear

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: *Notice of Violation dated October 8, 1996*
NRC Inspection Report 50-220/96-07 and 50-410/96-07

Gentlemen:

Inspection Report 96-07 requested that Niagara Mohawk Power Corporation (NMPC) provide a status of our program for review of surveillance testing procedures.

Our letter dated November 15, 1996 stated that the status of our program to review Surveillance Testing procedures would be submitted by November 22, 1996. Attachment A contains the status of Nine Mile Point Unit 1 (NMP1) and Nine Mile Point Unit 2 (NMP2) Surveillance Procedure review efforts.

Very truly yours,

R. B. Abbott
Vice President and General Manager - Nuclear

RBA/GJG/lmc
Attachment

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

9612030198 961122
PDR ADOCK 05000220
Q PDR

I



ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION SURVEILLANCE PROCEDURE REVIEW

NRC combined Inspection Report No. 50-220/96-07 and 50-410/96-07 requests that Niagara Mohawk:

"provide a status of your program to review surveillance procedures for adequacy, including the expected completion date, and your assessment of the deficiencies identified to date."

Niagara Mohawk Response

Contained herein is a specific discussion of both Nine Mile Point Unit 1 and Unit 2 actions with regard to surveillance procedures. Additionally, it is worth noting that there are processes in place for the evaluation of procedure deficiencies when they are identified via procedure use or review. When surveillance test deficiencies are identified, NMPC documents the deficiency on Deviation Event Reports (DERs). Following evaluation of the cause for the deviation, corrective actions are developed to ensure that any similar deficiencies are also identified and appropriately corrected. The necessity for and the depth of any additional reviews are based upon whether the cause evaluation indicates a likelihood for additional deficiencies to have existed.

Nine Mile Point Unit 1

Status

LER 95-03, "Technical Specification Surveillance Tests Not Performed on the Required Frequency Because of Cognitive Error" reported three surveillance procedures that had not been performed during a refueling outage as specifically stipulated in the Technical Specifications. The surveillances had been performed on an appropriate frequency (24 months) but had been performed at power rather than during a refueling outage. This was due to a longstanding misinterpretation which effectively rendered the statement "during each refueling outage" as equivalent to "cyclic" performance. Preventive actions resulting from the LER included:

- A review of the Technical Specifications to identify each surveillance that required performance during a refueling outage.
- Corrections to the surveillance test database frequency codes to ensure the identified surveillances were performed during a refueling outage.



- Correction of the associated surveillance procedures to ensure the frequency statements accurately reflected the Technical Specification performance frequency.

In April of 1994 (prior to the events that resulted in LER 95-03), NMPC reported a separate violation of Technical Specification Surveillance requirements under LER 94-03, "Missed Technical Specification Surveillance Caused By Inadequate Change Management." The LER identified that the drywell personnel and emergency airlock surveillances had not been performed on a six-month frequency as required by the Technical Specifications. The event was due to inadequate change management in that personnel failed to update the performance frequency contained in the surveillance test database after the airlock performance frequency was changed from annual to six-months per a Technical Specification amendment of July, 1993. Corrective actions from LER 94-03, which were completed in June 1994, included a comprehensive verification of the Technical Specification performance frequencies. NMPC realizes that this verification failed to identify the conditional frequency which required some surveillances to be performed "during a refueling outage." However, as described earlier in this report, the corrective actions for LER 95-03 resolved this issue. NMPC feels the combination of corrective actions from LER 94-03 and 95-03 are sufficient to assure Technical Specification surveillances are being performed on appropriate frequencies.

Note that corrective actions for LER 95-03 and 94-03 did not involve a review of the adequacy of test methods (such as logic or channel testing/calibration methods). However, Unit 1 has committed to such a review in our response to Generic Letter 96-01, "Testing of Safety-Related Logic Circuits." The GL 96-01 commitment involves the review of the surveillance procedures for RPS, Diesel Generator load shedding, and ESF actuation logic to ensure full compliance with the Technical Specifications. This effort is currently scheduled for completion in March 1999.

Expected Completion Date

- GL 96-01, completion date March 1999.

Assessment of Discrepancies Identified to Date

The scheduling type discrepancies identified to date have been the events described in LER 94-03, LER 95-03, and Supplement 1 to LER 95-03. The identification of the deviation described in Supplement 1 to LER 95-03 resulted from corrective actions for the original LER 95-03. Therefore, NMPC believes that the corrective actions have been effective in identifying the type of discrepancy addressed in LER 95-03. In addition, discrepancies have been identified (LER 96-01, "Technical Specification Caused by Improper Recirculation Flow Calibration Procedure" and LER 96-03, "Power to Flow Technical Specification Violation Due to Ineffective Change Management") and 94-01, "Violation of Technical Specification Surveillance Requirement Caused by Cognitive Personnel Error."

In the last four years, Unit 1 submitted 28 LERs, two of which involved Technical Specifications surveillance procedure inadequacies. LER 96-03 was unique in that the normal



operating procedure, plant operating configuration, and an error introduced in an operating procedure resulted in the violation. The remaining two issues, LER 94-01 and LER 96-01, have been identified in the normal procedure review process. As a result, we would expect that the procedures review process may continue to identify such errors. As mentioned above, NMPC has committed to review procedures in our response to GL 96-01. This review will be completed between 1997 and March 1999, and will finalize our procedure review process.



Nine Mile Point Unit 2

Status

A comprehensive review of Technical Specification required surveillance testing was performed from August 1994 to January 1995 at Nine Mile Point Unit 2. This project utilized the services of Vectra Technologies and was performed at the direction of station management in response to the continued occasional identification of surveillance testing discrepancies at the station. The scope of this review included Technical Specification Surveillance Requirements, the technical adequacy of the procedures which implement those requirements, a review of the surveillance test frequencies of those required procedures, and the associated scheduling database. This review encompassed the Technical Specification Surveillance Testing Requirements (excluding 10CFR50 Appendix J and ASME Section XI required testing). The level of detail of the review was substantial and resulted in numerous enhancements to the surveillance testing program procedures and tracking system. No violations of Technical Specification requirements were identified. The entire process involved the expenditure of approximately 3400 manhours of effort.

Currently, Nine Mile Point Unit 2 is preparing Technical Specification amendments to convert from the existing Technical Specifications to the Improved Standard Technical Specifications. Concurrent with Improved Technical Specifications, NMPC will implement our commitment to GL 96-01, "Testing of Safety Related Logic Circuits," as outlined in our August 14, 1996, letter to the NRC.

Expected Completion Date

1. Improved Technical Specifications program, September 1997 (for amendment submittal).
2. GL 96-01, prior to startup from RFO6 (spring 1998).

Assessment of Discrepancies Identified to Date

There are four recent LERs which identified problems with Nine Mile Point Unit 2 procedures. These are LER 96-01, "Technical Specification Violation Caused by Inadequate APRM Setdown Channel Functional Test," LER 96-02, "Technical Specification Violations Caused by Inadequate Surveillance Scheduling," LER 96-07, "Technical Specification Violation Due to Inadequate Work Organization/Planning," and LER 96-08, "Technical Specification Violations Caused by Inadequate Procedure." Based upon these LERs, NMPC has evaluated the adequacy of the independent reviews performed on our Technical Specification Surveillance Requirements. Following are the conclusions of our evaluation of these events:

We consider the condition described in LER 96-01 to be unique in that it involved reactor mode switch contacts that do not have specific surveillance requirements identified in the Technical Specifications but which were committed to be tested during APRM channel



functional tests as described in the initial FSAR questions and responses. Additionally, these contacts cannot be tested in operational condition 1.

LERs 96-02, 96-07, and 96-08 involved the timing of testing activities relative to changes in operational conditions. They did not involve technically deficient testing procedures. The completion of corrective actions for LER 96-02 and 96-08 should prevent any similar occurrences in the future. These Corrective Actions included: 1) reviewing NMP2 Surveillances for possible violation of TS SR 4.0.4; 2) reviewing applicable fuel handling and I&C surveillance procedures to ensure consistency with TS requirements; and 3) training personnel involved with preparing and scheduling surveillance tests to enhance the awareness of the requirements of TS 3.0 and 4.0 and the impact on changing operating conditions.

