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SUBJECT: Responds to NRC 970116 ltr re violations noted in insp repts 50-220/96-12 & 50-410/96-12.Corrective actions:NMP2 welds involved in violation were examined prior to startup from refueling outage during which deficiency was identified.

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February 18, 1997
NMP1L 1183

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 a Notice of Violation Dated January 16, 1997***

Gentlemen:

This letter responds to the Notice of Violation dated January 16, 1997 regarding the failure to inspect certain welds at both Nine Mile Point Unit 1 (NMP1) and Unit 2 (NMP2). The attachment to this letter addresses the specific items required by the Notice of Violation. Much of the information provided in the attachment is a summary of information already provided to the NRC in the NMP1 License Event Report (LER) 96-08, Supplement 1, and the NMP2 LER 96-12, Supplement 1; both of which were submitted on January 17, 1997.

Sincerely,

B. Ralph Sylvia
Chief Nuclear Officer

BRS/AFZ/kap
Attachments

250135

xc: Mr. H. J. Miller, Regional Administrator, Region I
Mr. B. S. Norris, Senior Resident Inspector
Mr. S. S. Bajwa, Acting Director, Project Directorate I-1, NRR
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ATTACHMENT A

Niagara Mohawk Power Corporation
Nine Mile Point Units 1 and Unit 2
Docket Nos. 50-220 and 50-410
DPR-63/NPF-69

REPLY TO NOTICE OF VIOLATION DATED JANUARY 16, 1997 AS CONTAINED IN INSPECTION REPORT 50-220/96-13 AND 50-410/96-13

STATEMENT OF VIOLATION

During an NRC inspection conducted from October 20 through November 30, 1996, a violation of NRC requirements was identified. In accordance with the NRC "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600, the violation is listed below:

> The Unit 1 Technical Specification, Section 4.2.6.a.2, requires inservice inspection (ISI) of piping identified in Generic Letter 88-01.
>
> The Unit 2 Technical Specification, Section 4.0.5.f., requires, that the inservice inspection program for piping identified in Generic Letter 88-01 be performed in accordance with the staff position on schedules, methods, personnel and sample expansion.
>
> Generic Letter 88-01, "NRC Position on IGSCC [Intergranular Stress Corrosion Cracking] in BWR [Boiling Water Reactor] Austenitic Stainless Steel Piping." Table 1, "Summary of Inspection Schedules for BWR Piping Weldments," states that Category D welds are to be inspected every two refueling cycles. In addition, the NRC safety evaluation, dated June 24, 1991, for NMPC's response to Generic Letter 88-01, states that Unit 1 had an augmented ISI program to inspect six of the thirty welds between the pumps or valves and the recirculation system piping each refueling outage.
>
> Contrary to the above, NMPC failed to adequately implement the Unit 1 and Unit 2 ISI program for piping identified in Generic Letter 88-01, as evidenced by the following:
>
> On or before November 5, 1996, Unit 1 failed to perform required inspections of five Category D core spray (CS) system welds at the required frequency. One CS weld was not inspected during refueling outages (RFO) 11 and RFO12, and four CS welds were not inspected during either RFO12 or RFO13. In addition, on or before November 5, 1996, Unit 1 failed to perform required inspections of either reactor recirculation system (RCS) welds at the required frequency. One RCS weld was not inspected during RFO11, four RCS welds were not inspected during RFO12, and three RCS welds were not inspected during RFO13.

On or before October 30, 1996, Unit 2 failed to perform required inspections on sixteen Category D welds in the reactor water cleanup (RWCU) system. None of the sixteen welds were inspected during either RFO2 or RFO3, and only four of the sixteen welds were inspected during RFO4.

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

I. The Reason for the Violation

Niagara Mohawk admits to the violation. For Unit 1, the specific welds and scheduling requirements were updated as described in Licensee Event Report (LER) 96-08, Supplement 1, and they are slightly different than those identified in the Notice of Violation. The cause of the violation was determined to be inadequate change management. Specifically, for Nine Mile Point Unit 1 (NMP1), welds requiring augmented inspection for Intergranular Stress Corrosion Cracking (IGSCC), as originally submitted to the NRC in the Generic Letter 88-01 response, were not properly identified in the Inservice Inspection (ISI) Program. For Nine Mile Point Unit 2 (NMP2) pertinent information was not transmitted to the ISI Program Manager, and as a result, welds requiring augmented inspection for IGSCC were not properly identified in the ISI Program.

The NMP1 root cause investigation determined that, prior to 1992, the Generic Letter 88-01 commitments were maintained in a database separate from the ISI Program Plan. In 1992, this data was manually transferred into the ISI Program Plan. During this transfer some welds were not identified as requiring Generic Letter 88-01 inspections and/or were not scheduled for inspection.

The NMP2 root cause investigation determined that in a letter to the NRC on February 13, 1992, Niagara Mohawk indicated that the ISI program had already been revised to change the category of 16 welds from A to D. This letter was incorrect in that the changes had not yet been incorporated, because pertinent information was not transmitted to the ISI Program Manager.

Contributing to the event at both units was inadequate managerial methods and oversight.

In as much as Niagara Mohawk identified these deficiencies at Unit 1 on 9/26/96 and at Unit 2 on 10/30/96, Licensee Event Reports (LERs) 96-08 and 96-12 were submitted for each unit, respectively. The original LERs were submitted on 10/25/96 and 12/2/96, and supplemental reports were submitted for each unit on January 17, 1997. More detailed information related to the circumstances and causes are provided in these documents.

II. Corrective Actions Taken and Results Achieved

The corrective actions taken at both units included completion of the required weld examinations. Specifically, at NMP1 the welds involved in this violation were examined during a forced outage in November 1996. At NMP2 the welds involved in this violation were

examined prior to startup from the refueling outage (RFO5) during which the deficiency was identified. These examinations did not identify any reportable or rejectable indication in any of the welds.

More information related to the circumstances of the violation and the corrective actions taken are provided in NMP1 Licensee Event Report (LER) 96-08 Supplement 1 and NMP2 LER 96-12 Supplement 1.

III. Actions Taken To Prevent Recurrence

The actions being taken to prevent recurrence include updating and correcting the ISI Programs for both units. These actions are currently underway, and at NMP1 some additional program discrepancies have been identified, none of which, to date, represent non-compliance with regulatory requirements although actions may be required to ensure implementing documentation is consistent. In addition, the current ISI Program management methods and level of oversight will be evaluated relative to task requirements, and appropriate changes will be made, as required. The unitized management of the ISI programs is being reconsidered along with staffing size of the ISI program group. The Engineering Branch Managers have been assigned this task which is scheduled for completion on May 15, 1997.

Furthermore, since the period when the cause of the violation occurred, the commitment management and correspondence review processes have been enhanced to clarify the responsibilities and requirements for identifying correspondence reviewers and regulatory commitments.

More information related to the circumstances of the violation and the corrective actions taken to prevent recurrence are provided in NMP1 Licensee Event Report (LER) 96-08 Supplement 1 and NMP2 LER 96-12 Supplement 1.

IV. Date When Full Compliance Will Be Achieved

Full compliance at both units was achieved when the required welds were volumetrically examined. For Unit 1, this was achieved on November 12, 1996. For Unit 2 this was achieved on October 31, 1996.