

U.S. NUCLEAR REGULATORY COMMISSION

Region I

Report No. 82-14
Docket No. 50-220
License No. DPR-63 Priority -- Category C

Licensee: Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Facility Name: Nine Mile Point Nuclear Station, Unit 1

Inspection at: Scriba, New York

Inspection conducted: August 1-31, 1982

Inspectors: S. D. Hudson 9/14/82
S. D. Hudson, Senior Resident Inspector date signed

_____ date signed

_____ date signed

Approved by: H. B. Kister 9/17/82
H. B. Kister, Chief, Reactor Projects date signed
Section 1C

Inspection Summary:

Inspection on August 1-31, 1982 (Report No. 50-220/82-14)

Areas Inspected: Routine, onsite regular and backshift inspections by the resident inspector (86 hours). Areas inspected included: licensee action on previous inspection findings, plant tours, observation of physical security, plant maintenance, respiratory protection equipment usage, general employee training, containment vent and purge valve operation, review of LER's and review of periodic reports.

Results: No violations were identified in eight of the areas inspected. One violation was identified in the radiation protection area. (Failure to follow RWP requirements)

8210070350 820922
PDR ADDCK 05000220
G PDR

DETAILS

1. Persons Contacted

J. Aldrich, Supervisor, Operations
K. Dahlberg, Site Maintenance Superintendent
W. Drews, Technical Superintendent
J. Duell, Supervisor, Chemistry and Radiation Protection
G. Gresock, Safe End Project Manager
F. Hawksley, Supervisor, Mech. Maintenance
E. Leach, Superintendent of Chemistry and Radiation Management
T. Perkins, General Superintendent, Nuclear Generation
T. Roman, Station Superintendent

The inspector also interviewed other licensee personnel during the course of the inspection including shift supervisors, administrative, operations, health physics, security, instrument and control, and contractor personnel.

2. Licensee Action on Previous Inspection Findings

(Closed) VIOLATION (81-04-01): Failure to follow procedures for use of Radiation Work Permits. The inspector reviewed the licensee's response dated May 21, 1982 and attended the general employee training sessions. This annual training addresses the proper use of Radiation Work Permits.

(Closed) VIOLATION (81-04-03): Failure to perform radiological surveys. The general employee training discusses the need for radiological surveys. Through discussions with station personnel, the inspector determined that radiation protection technicians are available 24 hours a day to perform any needed surveys.

(Closed) VIOLATION (82-04-01): Failure to follow calibration procedure. The inspector reviewed Laboratory Instrument Procedure No. IV.A.20, "Operation of the L&N Model 4866 Conductivity," Revision 2, dated May 11, 1982 and verified that the procedure had been revised to specify the resistor sizes currently used for calibration checks. The inspector also reviewed the data sheets for June, July and August 1982 to verify that the supervisory review was completed in a timely manner.

(Closed) VIOLATION (79-20-02): Failure to instruct workers as required by 10 CFR 19. The inspector attended the training course presented to all radiation workers. The course meets the requirements of 10 CFR 19.

3. Plant Tours

(1) During the inspection period, the inspector made multiple tours of plant areas to make an independent assessment of equipment conditions, radiological conditions, safety and adherence to regulatory requirements. The following areas were among those inspected:

- Control Room
- Turbine Building

- Auxiliary Control Room
- Vital Switchgear Rooms
- Yard Areas
- Radwaste Area
- Diesel Generator Rooms
- Screen House
- Reactor Building
- Drywell

(2) The following items were observed or verified:

(a) Radiation Protection:

- Personnel monitoring was properly conducted.
- Randomly selected radiation protection instruments were calibrated and operable. On August 26, the inspector noticed an inoperable portable area radiation monitor in the drywell near #14 recirc system suction nozzle. Licensee personnel promptly replaced it with an operable one.
- Area surveys were properly conducted and the Radiation Work Permits were appropriate for the as-found conditions.
- Radiation Work Permit requirements were being followed. On August 26, 1982, the inspector reviewed Radiation Work Permit (RWP) #1166 for work inside the drywell and the Reactor Building elevation 237'. The RWP specified different protective clothing requirements for various types of work being performed. The inspector determined that ten individuals were required to wear full face respirators and therefore, perform a qualitative fit test prior to their use. At the time of the inspection, only one individual had indicated on the RWP that the fit test had been performed. Radiation Protection Procedure RP-2, "Radiation Work Permit Procedure," Revision 1, dated February 13, 1979 requires in Section 5.6 that if a qualitative fit test is specified on the RWP, indication of having passed the test must be indicated by a "✓" in the "Passed Fit Test," column when signing in. The failure to meet the requirements of RP-2 is a violation of Technical Specification 6.11. (50-220/82-14-01)

(b) Fire Protection:

- Randomly selected fire extinguishers were accessible and inspected on schedule.
- Fire doors were unobstructed and in their proper position.
- Ignition sources and combustible materials were controlled in accordance with the licensee's approved procedures.
- Fire watches were posted during periods when smoke detection equipment was out of service.

(c) Equipment Controls:

- Jumpers and equipment tagouts did not conflict with Technical Specification requirements.
- The inspector independently verified that the following tagouts had been properly conducted by observing the position of breaks and/or valves:

BMU #68670 on the Diesel Fire Pump

BMU #68676 on the Fire Detection System

- The inspector independently verified that BMU #68671 had been properly cleared and the Fire Detection System returned to its normal standby condition.

(d) Radioactive Waste System Controls:

- The inspector witnessed the survey of radioactive waste shipment #0882-147L prior to its departure from the site to verify that applicable Federal limits were not exceeded. The shipment consisted of 44.5 curies of dewatered powdex resins. The inspector reviewed the Radioactive Shipment Record and the isotopic analysis and determined that they were properly completed. The inspector examined the shipment to verify that it was properly labelled and discussed with the truck driver his duties and responsibilities.

(e) Review of Logs and Operating Records:

The inspector reviewed the following logs and instructions for the period August 1, 1982 through August 31, 1982:

- Control Room Log Book
- Station Shift Supervisor's Log Book
- Station Shift Supervisor's Instructions
- Safe End Project Log

The logs and instructions were reviewed to:

- Obtain information on plant problems and operation;
- Detect changes and trends in performance;
- Detect possible conflicts with technical specifications or regulatory requirements;
- Determine that records are being maintained and reviewed as required, and
- Determine that the reporting requirements of technical specifications are met.

No violations were identified.

4. Observation of Physical Security

The inspector made observations and verified during regular and off-shift hours that selected aspects of the plants physical security system were in accordance with regulatory requirements, physical security plan and approved procedures. The following observations relating to the physical security plan were made:

- The security force on both regular and off-shifts were properly manned and appeared capable of performing their assigned functions.
- Protected area barriers were intact - gates and doors closed and locked if not attended.
- Isolation zones were free of visual obstructions and objects that could aid an intruder in penetrating the protected area.
- Persons and packages were checked prior to entry into the protected area.
- Vehicles were properly authorized, searched and escorted or controlled within the protected area.
- Compensatory measures were implemented during periods of equipment failure.
- Persons within the protected area displayed photo-identification badges, persons in vital areas were properly authorized, and persons requiring an escort were properly escorted.

No violations were identified.

5. Plant Maintenance

The inspector examined portions of various safety related maintenance activities. Through direct observation and review of records, he determined that:

- These activities did not violate the limiting conditions for operation.
- Required administrative approvals and tagouts were obtained prior to initiating the work.
- Approved procedures were used or the activity was within the "skills of the trade."
- Appropriate radiological controls were properly implemented.
- Equipment was properly tested prior to returning it to service.
- Quality Control hold points were observed.
- Ignition/fire prevention controls are appropriate.

During this inspection period, the following maintenance activities were examined:

- Welding #13 and 14 recirculation suction safe end to the reactor vessel.
- Installation of shielding in #15 discharge nozzle.
- Weld crown grinding #13 suction nozzle safe end.
- Repair of the Shutdown Cooling return check valve #38-12. Post repair testing of this valve was not completed at this time because three replacement studs are on order.

No violations were identified.

6. Respiratory Protection Equipment Usage

On June 24, 1982, the licensee issued Radiation Protection Procedure RP-10, "Use of Respiratory Equipment," Revision 0. This procedure requires that a Respiratory Qualification Report be maintained which shows the status of all requirements necessary to qualify for the use of a particular respirator. This computerized report includes the date of the current physical examination, training, whole body count, and fit test for each individual who is a radiation worker. A Respiratory Equipment Usage Authorization signed by the Respiratory Protection Coordinator or designate may be used to allow an individual to use respiratory equipment if the Respiratory Qualification Report is not current.

On June 23, an individual was issued Respiratory Equipment Usage Authorization because he had recently passed the qualitative fit test. During the month of July, this individual who had failed the written examination on the use of respiratory equipment on June 3, 1982 and the physical examination on June 1, 1982, made ten entries into the drywell. This area requires the use of appropriate respiratory equipment. The respiratory equipment was obtained by presenting the same Authorization that was issued on June 23.

When informed of the unauthorized use of respiratory equipment by the resident inspector, the licensee took prompt action to strengthen its management controls in this area. "Failure" data as well as "pass" data is now entered on the computerized Respiratory Qualification Report. This will preclude an individual from being indicated as qualified when in fact he has failed his most recent physical or test. For the event addressed in this report, the inputting of "failure" data would have prevented the unauthorized usage. The individual's last physical and training were shown as valid until July 6 and July 2, 1982 respectively on the June 23 Respiratory Qualification Report when in fact the individual had failed both the physical and the training in early June 1982.

Additionally, the licensee issued an instruction to ensure that the respiratory issue room is locked when not manned. The technicians manning the cage are instructed to check each person's qualifications at least daily when issuing a respirator. Respiratory Equipment Usage Authorizations will be collected by the technicians when presented for issue of the equipment. The form will be revised to include an expiration date of the authorization.

The inspector reviewed the current Respiratory Qualification Report dated August 31, 1982 and determined that the individual involved was correctly listed as not qualified to use respiratory equipment. He also determined that the Authorization issued June 23 had been revoked.

7. Review of Licensee Event Reports (LER's)

LER's submitted to NRC, Region I were reviewed to verify that the details were clearly reported, including accuracy of the description of the cause and adequacy of the corrective action. The inspector determined whether further information was required from the licensee, whether generic implications were indicated, and whether the event warranted onsite followup. The following LER's were reviewed:

<u>LER No.</u>	<u>Event Date</u>	<u>Subject</u>
82-09, Revision 1	March 23, 1982	Ultrasonic indications in recirc piping

The possible generic implications are under review by the NRC.

82-11	August 2, 1982	Oil leak on diesel fire pump
-------	----------------	------------------------------

No violations were identified.

8. General Employee Training

The inspector attended the general employee training to determine that the requirements of Administrative Procedure APN-10D, "General Employee Training," are met. The training consists of radiation protection, emergency procedures, security, administrative procedures and quality control indoctrination. Each

individual granted unescorted access to the restricted area of the station is required to pass a written examination on the radiation protection requirements. They must also demonstrate the proper use of protective clothing and the step-off pad procedure. A separate written examination is required for those individuals who may be required to wear respirators. The training and examinations are repeated annually (\pm 3 months). The inspector reviewed the training records of selected individuals to verify that the specified frequency was met.

No violations were identified.

9. Containment Vent and Purge Valve Operation

In a letter to the NRC dated December 17, 1979, the licensee stated that the containment venting and purging operations would be kept to as low as reasonably achievable. This was estimated to be about 90 hours per year. The inspector reviewed Operating Procedure OP-9, "Nitrogen Inerting and H₂ - O₂ Monitoring Systems for the Primary Containment and Pressure Suppression System," Revision 8, dated May 28, 1982 and determined that the drywell (D.W.) and torus air vent and purge isolation valves and the D.W. and torus nitrogen vent and purge isolation valves are required to be normally closed. The inspector reviewed selected station logs to determine during 1981 that these valves were open for approximately 17 hours. They were opened to allow normal inerting and venting of the primary containment.

No unacceptable conditions were identified.

10. Review of Periodic Reports

The following report was reviewed to determine that the reporting requirements of Technical Specifications are being met and that plant operations are accurately reported:

-- Monthly Operating Report for July 1982.

No violations were identified.

11. Exit Interview

At periodic intervals during the course of the inspection, meetings were held with senior facility management to discuss the inspection scope and findings.