

# Niagara Mohawk

November 24, 1999  
NMP2L 1910

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: Docket No. 50-410  
LER 99-09, Supplement 1

Gentlemen:

In accordance with 10 CFR 50.73 (a)(2)(i)(B), we are submitting Licensee Event Report 99-09, Supplement 1, "Nonconformance with Technical Specification Regarding ASME Section XI Class 2 Check Valve Reverse Flow Testing." This report changes a corrective action. Corrective Action 3 now states that a licensing document change request has been written to incorporate correct design information into the next revision of the Updated Safety Analysis Report, to be submitted in accordance with 10 CFR 50.71(e).

Very truly yours,



Michael F. Peckham  
Plant Manager - NMP2

MFP/CES/jb  
Attachment

xc: Mr. H. J. Miller, Regional Administrator, Region I  
Mr. G. K. Hunegs, NRC Senior Resident Inspector  
Records Management

IE22

## LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 30.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)

Nine Mile Point Unit 2

DOCKET NUMBER (2)

05000410

PAGE (3)

01 OF 04

TITLE (4)

Nonconformance with Technical Specification Regarding ASME Section XI Class 2 Check Valve Reverse Flow Testing

EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)	
05	26	99	99	009	01						

OPERATING MODE (9)

1

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

POWER LEVEL (10) 100%	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(2)(v)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 73.71
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<i>(Specify in Abstract below and in Text, NRC Form 366A)</i>
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

S. Geier, Manager Engineering

TELEPHONE NUMBER

315-349-7887

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

 YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH

DAY

YEAR

ABSTRACT (Limits to 1400 spaces, i.e., approximately fifteen single space typewritten lines) (16)

On May 26, 1999, Engineering Services personnel identified that high pressure core spray (CSH) valve 2CSH\*V59 had not been reverse-exercise tested during the second ten year interval as required by American Society of Mechanical Engineers (ASME) Code Section XI. The valve had been appropriately tested during the first ten year interval, but inappropriately exempted from the second ten year plan. This was discovered as a result of the investigation into LER 99-07, "Violation of Technical Specifications Regarding ASME Code Section XI Class 2 Weld Inspection Requirements Due to Improper Use of a Code Exemption," and LER 99-08, "Inadequate Surveillance of Reactor Core Isolation Cooling Check Valve."

The cause of the event has been determined to be that the level of rigor expected of technical evaluations was not communicated to our engineering organization prior to the development of the Second Ten Year Interval IST [Inservice testing] Program Plan. In addition, the design information contained in General Electric Specification #22A1483 regarding the safety function of 2CSH\*V59 had not been incorporated into the valve design specification or the Updated Safety Analysis Report.

Valve 2CSH\*V59 was leak-tested and the valve checked properly. Engineering and licensing documentation will be revised to reflect the requisite function of 2CSH\*V59. Finally, management expectations will be reinforced with engineering personnel.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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FACILITY NAME (1)  Nine Mile Point Unit 2	DOCKET NUMBER (2)  05000410	LER NUMBER (6)			PAGE (3)  02 OF 04
		YEAR  99	SEQUENTIAL NUMBER  09	REVISION NUMBER  01	

TEXT (If more space is required, use additional NRC Form 366A's) (17)

## I. DESCRIPTION OF EVENT

Nine Mile Point Unit 2 (NMP2) Technical Specifications Surveillance Requirement 4.0.5.a requires that inservice testing (IST) of American Society of Mechanical Engineers (ASME) Code Class 2 valves be conducted in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda. On May 26, 1999, with NMP2 at full power operations, Engineering Services personnel determined that 2CSH\*V59 had not been classified as an active valve. Based on the misclassification, Niagara Mohawk Power Corporation (NMPC) had omitted 2CSH\*V59 from the Second Ten Year Interval IST Program Plan, and had not reverse-exercise tested 2CSH\*V59 during cold shutdowns since November 1997.

NMPC removed 2CSH\*V59 from the IST program in April 1998 based upon the valve design specification, the Updated Safety Analysis Report (USAR), and a safety classification determination. According to these documents, the function of the valve was passive. However, General Electric Specification #22A1483, paragraph 4.2.3.11, describes the function of the valve, along with valve 2CSH\*MOV101, as being the prevention of reverse flow of suppression pool water to the condensate storage tank. The General Electric specification and the First Ten Year Interval IST Program Plan were not properly reviewed prior to removing 2CSH\*V59 from the Second Ten Year Interval IST Program Plan.

During the first ten year interval, 2CSH\*V59 was in the IST program, and NMPC correctly reverse-exercise tested the valve during cold shutdowns. However, the subsequent failure to reverse-exercise test 2CSH\*V59 in accordance with the ASME Section XI requirements is a nonconformance with Technical Specification Surveillance Requirement 4.0.5.a. This discrepancy was found as a result of the investigation into LER 99-07, "Violation of Technical Specifications Regarding ASME Code Section XI Class 2 Weld Inspection Requirements Due to Improper Use of a Code Exemption," and LER 99-08, "Inadequate Surveillance of Reactor Core Isolation Cooling [RCIC] Check Valve."

## II. CAUSE OF EVENT

NMPC determined the root cause for this event was that expectations regarding the level of rigor in evaluations were not communicated to our engineering organization at the time the safety classification determination was developed. During development of the Second Ten Year Interval IST Program Plan, efforts to improve the rigor of evaluations were in progress as the result of previous identified engineering program weaknesses, but the improvements had not been completed. As a result, the information contained in General Electric Specification #22A1483 regarding the safety function of 2CSH\*V59 was not utilized in the preparation of the safety classification determination, nor was the information incorporated into the changes made to the Second Ten Year Interval IST Program Plan.

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

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Nine Mile Point Unit 2	05000410	99	- 09	- 01	03 OF 04

TEXT (if more space is required, use additional NRC Form 366A's) (17)

**II. CAUSE OF EVENT (Cont'd)**

NMPC identified a contributing cause as the omission of relevant technical information. The design information contained in General Electric Specification #22A1483 regarding the safety function of 2CSH\*V59 has not been incorporated into the valve design specification or the USAR.

**III. ANALYSIS OF EVENT**

NMPC is reporting this event in accordance with 10CFR50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications." The valve is required to be tested in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda. NMPC has not reverse-exercise tested 2CSH\*V59 since November 1997, even though the plant has been in cold shutdown. Therefore, NMPC did not meet the requirements of NMP2 Technical Specification Surveillance Requirement 4.0.5.a for ASME Class 2 valves.

NMPC leak-tested 2CSH\*V59. From the satisfactory leak test results, NMPC concluded that the valve checked properly and would be able to perform its safety function. Therefore, there was no adverse affect on the health and safety of the public or plant operators.

**IV. CORRECTIVE ACTIONS**

1. 2CSH\*V59 will be incorporated into the Second Ten Year Interval IST Program Plan by July 31, 1999.
2. The safety classification determination for 2CSH\*V59 and other design information will be revised by July 31, 1999.
3. Licensing Document Change Request 2-99-UFS-07300 has been generated to incorporate this change in the next update of the Updated Safety Analysis Report.
4. Engineering Management will reinforce expectations on use of design documents and licensing correspondence with emphasis on General Electric system specifications with appropriate design groups by July 30, 1999.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

## V. ADDITIONAL INFORMATION

A. Failed components: none.

B. Previous similar events:

- LER 99-08, describes NMPC's failure to test RCIC Check Valve 2ICS\*V249. This LER [99-09] was identified during the investigation into LER 99-07 and LER 99-08.
- LER 96-07, "Technical Specification Violation Due to Inadequate Work Organization/Planning." This event involved the failure to perform required testing due to improperly grouping multiple surveillance requirements. Since this root cause was administrative in nature and did not involve an inadequate testing methodology, it would not be reasonable to expect that those corrective actions would have prevented the current event.

C. Identification of components referred to in this LER:

Components	IEEE 803A Function	IEEE 805 System ID
High Pressure Core Spray System	N/A	BG
Check Valve	V	BG