

## Nine Mile Point 1

### 2Q/2005 Plant Inspection Findings

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## Initiating Events

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## Mitigating Systems

**Significance:**  Jun 30, 2005

Identified By: NRC

Item Type: NCV NonCited Violation

### Multiple Examples of Cable Splices Inside Unit 1 Drywell That Were Not Environmentally Qualified

The inspectors identified a non-cited violation (NCV) for multiple types of cable splices at Unit 1 that were not environmentally qualified. 10 CFR 50.49(f) requires that each item of electric equipment important to safety within the scope of 10 CFR 50.49(b) must be qualified by one of several methods described in that section. As of April 2005, there were 11 Okonite cable splices, 47 Raychem splices and one barrel-type butt splice in the Unit 1 drywell that were not environmentally qualified because these splices did not conform to the qualified configurations described in Procedure N1-EMP-GEN-003, "Insulating Medium and Low Voltage Power Connections Control and Instrumentation Cables." These cable splices were used in the control circuitry of motor-operated valves and solenoid-operated valves that were required for accident mitigation and the circuitry of temperature instruments that were required for accident monitoring. This electric equipment is within the scope of 10 CFR 50.49(b).

The finding is greater than minor because it is associated with the equipment performance attribute of the Mitigating Systems cornerstone and affects the cornerstone objective of equipment reliability. The issue was a qualification deficiency that the licensee had evaluated in accordance with Generic Letter (GL) 91-18, and was determined to be of very low safety significance (Green) because the unqualified cable splices were determined to be either operable (i.e., insignificant leakage currents when subject to accident environment), or in a condition where the function of the inoperable cable splice (reactor vent valve unable to open) could be bypassed by an alternate mitigating method (alternate reactor vent path) as prescribed in an existing emergency operating procedure (EOP) to achieve similar accident mitigation results. The unqualified cable splices were replaced by qualified ones during the April refueling outage. The inspectors identified that a contributing cause of this finding was related to the cross-cutting area of problem identification and resolution. The relevant causal factor was problem identification because the nonconforming splices in the drywell were not identified by the engineering staff in a timely manner.

Inspection Report# : [2005003\(pdf\)](#)

**Significance:**  Mar 31, 2005

Identified By: NRC

Item Type: NCV NonCited Violation

### Failure to Perform a 50.59 Screen During Development of an Emergency Condenser Capacity Test

The inspectors identified a non-cited violation (NCV) of Unit 1 TS 6.4.1.a concerning an inadequate procedure review and approval process related to the development of procedure N1-ST-V19, "Emergency Cooling System - Heat Removal Capability Test at High Power." Specifically, the licensee incorrectly determined that all aspects of the activity were controlled by other processes, thereby negating the requirement for a 10 CFR 50.59 screen. Subsequently it was determined that the procedure also contained changes that affect operation and control of other systems and therefore that a 10 CFR 50.59 screen should have been completed. The performance deficiency associated with this event is a failure to perform a 10 CFR 50.59 screen when one was required.

The finding is greater than minor because it is associated with the Mitigating Systems Cornerstone attribute of procedure quality and affected the associated cornerstone objective of ensuring the capability of the emergency condenser system, a core decay heat removal system, to respond to initiating events to prevent undesirable consequences. The finding was determined to be of very low safety significance in accordance with phase 1 of the SDP because it was not a design or qualification deficiency, did not represent an actual loss of the emergency condenser system safety function, and was not potentially risk significant due to seismic, flood, fire or weather related initiating events.

Inspection Report# : [2005002\(pdf\)](#)

**Significance:**  Mar 31, 2005

Identified By: NRC

Item Type: NCV NonCited Violation

### Failure to Adequately Assess Risk Associated with Maintenance on the Control Room Ventilation System

The inspectors identified a non-cited violation (NCV) of 10 CFR 50.65(a)(4) for the failure to adequately assess the increase in risk that resulted from maintenance on the Unit 1 control room ventilation system. Specifically, no assessment of risk was performed prior to opening doors which served as barriers between the mild environment of the control room and the potential harsh environment of the Turbine Building resulting from a high energy line break (HELB). The performance deficiency associated with this event is failure to adequately assess the

increased risk from a HELB in the Turbine Building with doors in the HELB boundary open to the Control Room.

The finding is more than minor because if left uncorrected, it would become a more significant safety concern in that actions to assess and manage increases in risk may not have been implemented. The finding was determined to be of very low safety significance in accordance with phase 3 of the SDP because it resulted in a change in core damage frequency (CDF) significantly below the green/white risk threshold.

Inspection Report# : [2005002\(pdf\)](#)

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**Significance:** Dec 31, 2004

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure of the Nine Mile Point Unit 1 & 2 Plant-Referenced Simulator to Demonstrate Expected Plant Response to Operator Input and to Transient Conditions**

An NRC identified finding for failure of the NMP Unit 1 and Unit 2 simulators to comply with 10 CFR 55.46(c)(1), "Plant-referenced simulators." The NCV involved two examples of the failure of Nine Mile Point simulators to correctly demonstrate the expected plant response to two separate events, one at each NMP unit.

This finding is more than minor because it affects the human performance (human error) attribute of the Mitigating Systems Cornerstone. The finding is of very low safety significance (Green) because the simulators' uncorrected model discrepancies did not have an adverse impact on operator actions such that safety-related equipment was made inoperable during normal operations or in response to a plant transient.

Inspection Report# : [2004005\(pdf\)](#)

G

**Significance:** Sep 30, 2004

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Promptly Identify and Correct Deficient (unqualified) Okonite Cable Splices**

The inspectors identified a violation of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," for failure to promptly identify and correct seven deficient Okonite cable splices at Unit 1 that were required to be environmentally qualified (EQ). The cable splices were repaired and EQ program deficiencies were addressed by the corrective action program. The finding is greater than minor because it was associated with the equipment performance attribute of the Mitigating Systems Cornerstone and affected the cornerstone objective of equipment reliability. The finding is of very low safety significance because the unqualified cable splices had been determined to be operable per Generic Letter 91-18.

The failure to promptly identify and correct deficient Okonite cable splices is an example of a cross-cutting issue in problem identification and resolution.

Inspection Report# : [2004004\(pdf\)](#)

G

**Significance:** Sep 03, 2004

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Maintain a Controlled Document Current Resulted in a Surveillance Test Being Erroneously Considered Satisfactory**

The inspectors identified a Non-Cited Violation of the NMP1 Technical Specifications (TS), Section 6.4, "Procedures," regarding a May 2004 surveillance test of the NMP1 High Pressure Coolant Injection (HPCI) system that was incorrectly evaluated as satisfactory due to a controlled document not being maintained current for a TS and risk-significant system.

The performance deficiency was that NMP1 did not ensure that the most recent revision of a controlled document was used during a TS surveillance test of the HPCI system. The finding is more than minor since it is associated with the maintenance and testing procedures attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). The issue was determined to be of very low safety significance (Green) because it was not a design or qualification deficiency that resulted in a loss of function per Generic Letter 91-18.

Inspection Report# : [2004007\(pdf\)](#)

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**Significance:** Sep 03, 2004

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Maintain the NMP1 EOP Technical Basis Document Current**

The inspectors identified a Green Non-Cited Violation of 10CFR50, Appendix B, Criterion V, "Instruction, Procedures, and Drawings," for NMP1's failure to maintain current the Technical Basis Document for the Unit 1 Emergency Operating Procedures (EOPs). Specifically, the basis for the Anticipated Transient Without a Scram (ATWS) EOP did not discuss the "Fuel Zone" reactor water level indication, and the use of the associated correction table.

The performance deficiency was that NMP1 did not maintain the EOP Technical Basis Document (a controlled procedure) consistent with the plant's EOPs. The finding is more than minor because it affects the procedure quality attribute of the Mitigating Systems cornerstone objective to ensure that availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core

damage). The finding was determined to be of very low safety significance (Green), because the EOP technical basis document did not represent a design or qualification deficiency that resulted in a loss of function per Generic Letter 91-18.

Inspection Report# : [2004007\(pdf\)](#)

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## Barrier Integrity

**Significance:**  Sep 30, 2004

Identified By: NRC

Item Type: NCV NonCited Violation

### **Procedural Noncompliance Resulted in Failure to Shutdown Cooling Isolation Valve IV-38-02 Motor Operator**

A self-revealing non-cited violation (NCV) of Unit 1 Technical Specification 6.4.1 was identified, in that the motor operator for shutdown cooling (SDC) system supply isolation valve was jogged open, contrary to precautions given in the system operating procedure. The performance deficiency associated with this finding is procedural non-compliance which led to failure of the valve's motor operator and resultant loss of remote isolation capability. The finding is greater than minor because it is associated with the Barrier Integrity Cornerstone attribute of containment barrier performance and affects the cornerstone objective of providing reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. The finding is of very low safety significance because it did not represent a degradation of the radiological barrier function provided for the control room, spent fuel pool, or standby gas treatment system, did not represent a degradation of the barrier function of the control room against smoke or a toxic atmosphere, and did not represent an actual open pathway in the physical integrity of reactor containment or involve an actual reduction in defense-in-depth for the atmospheric pressure control or hydrogen control functions of the reactor containment. The procedure violation involving operation of the SDC system supply isolation valve is an example of a cross-cutting issue in human performance.

Inspection Report# : [2004004\(pdf\)](#)

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## Emergency Preparedness

**Significance:**  Sep 30, 2004

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Maintain the Emergency Power Supply to the Technical Support Center**

The inspectors identified a non-cited violation (NCV) of 10 CFR 50.47, "Emergency Plans," in that the emergency power supply to the Technical Support Center (TSC) was taken out of service for 16 months. The performance deficiency associated with this finding is that the licensee failed to take compensatory measures to provide for the continued operability of the TSC in the event of a loss of the normal power supply. The finding is greater than minor because it is associated with the facilities and equipment attribute of the Emergency Preparedness cornerstone and affects the cornerstone objective planning standard of 10 CFR 50.47(b)(8). The finding is of very low safety significance because the performance deficiency was failure to comply with a non-risk significant planning standard and no loss of planning standard function occurred. The failure to maintain TSC emergency electrical power is an example of a cross-cutting issue in problem identification and resolution.

Inspection Report# : [2004004\(pdf\)](#)

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## Occupational Radiation Safety

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## Public Radiation Safety

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## Physical Protection

[Physical Protection](#) information not publicly available.

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## Miscellaneous

Last modified : August 24, 2005