February 5, 2001

Mr. John H. Mueller
Chief Nuclear Officer
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
Operations Building, 2nd Floor
P.O. Box 63
Lycoming, NY 13093

SUBJECT: NRC's NINE MILE POINT INSPECTION REPORT 05000220/2000-010, 05000410/2000-010

Dear Mr. Mueller:

On December 30, the NRC completed an inspection of your Nine Mile Point Nuclear Station, Units 1 and 2. The enclosed report presents the results of that inspection. Preliminary results were discussed with Mr. J. Conway and other members of your staff on January 12, 2001.

NRC inspectors examined numerous activities as they related to reactor safety and compliance with the Commission's rules and regulations and with the conditions of your operating license. The inspection consisted of a selected examination of procedures and records, observations of activities, and interviews with personnel.

Based upon the results of this inspection, the inspectors identified two issues of very low safety significance (Green), one of which was determined to involve a violation of NRC requirements. However, because of the very low safety significance and because the violation was entered into your corrective action program, the NRC is treating this issue as a Non-Cited Violation (NCV), consistent with Section VI.A.1 of the NRC's Enforcement Policy, issued on May 1, 2000, (65FR25368). If you contest this NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001: with copies to the Regional Administrator, Region I; the Director, Office of Enforcement; and the NRC Resident Inspector at the Nine Mile Point Nuclear Power Plant.

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Sincerely,

/RA/

Michele G. Evans, Chief
Projects Branch 1
Division of Reactor Projects

Docket Nos.: 05000220, 05000410
License Nos.: DPR-63, NPF-69

Enclosure: NRC's Nine Mile Point Inspection Report 05000220/2000-010, 05000410/2000-010

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U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Docket Nos:	050000220, 050000410
License Nos:	DPR-63, NPF-69
Report No:	050000220/2000-010, 050000410/2000-010
Licensee:	Niagara Mohawk Power Corporation (NMPC)
Facility:	Nine Mile Point, Units 1 and 2
Location:	P. O. Box 63 Lycoming, NY 13093
Dates:	November 12, 2000 - December 30, 2000
Inspectors:	G. Hunegs, Senior Resident Inspector R. Fernandes, Resident Inspector B. Fuller, Resident Inspector P. Frechette, Physical Security Inspector J. Noggle, Senior Health Physicist C. Sisco, Operations Engineer J. Williams, Senior Operations Engineer
Approved by:	Michele G. Evans, Chief Projects Branch 1 Division of Reactor Projects

Summary of Findings

IR 05000220-00-010, 05000410-00-010; on 11/12 - 12/30/2000; Niagara Mohawk Power Corporation; Nine Mile Point, Units 1 & 2; Operability evaluations, post maintenance testing.

This inspection was conducted by the resident inspectors and four region based inspectors. The inspection identified two Green findings. The significance of all findings is indicated by their color (Green, White, Yellow, or Red) and was determined by the "Significance Determination Process" (See Attachment 2). Findings for which the Significance Determination Process (SDP) does not apply are indicated by "No Color."

A. Inspector Identified Findings

Cornerstone: Mitigating Systems

Green. The inspectors determined that the initial technical basis to conclude that the shutdown cooling inside containment isolation check valve, 2RHS*MOV39B, was operable was not adequate. This finding was of very low safety significance, in that, the outside containment isolation valve is normally shut during power operations and a subsequent alternate Appendix J leak rate test determined that the valve would perform its intended containment isolation function. (Section 1R15)

Green. The inspector determined that the high pressure core spray (HPCS) inservice test was not adequately testing the reverse flow safety function of the HPCS pump discharge check valve.

This finding was of very low safety significance due to the very low probability of a loss of offsite power (LOOP) coincident with a small break loss of coolant accident (SBLOCA) which would rely upon the HPCS system independent electrical power and coolant injection design functions. This issue was treated as a Non-Cited Violation of 10CFR50, Appendix B, Criterion XI, "Test Control." (Section 1R22)

B. Licensee Identified Violations

Violations of very low significance, which were identified by the licensee, have been reviewed by the inspector. Corrective actions taken or planned by the licensee appear reasonable. These violations are summarized in Section 4OA7 of this report.

Report Details

SUMMARY OF PLANT STATUS

Nine Mile Point Unit 1 (Unit 1) began this inspection report period at 100 percent power. With the exception of several planned power reductions for maintenance, Unit 1 remained at 100 percent power through the end of the inspection period.

Nine Mile Point Unit 2 (Unit 2) began this inspection report period at 100 percent power. With the exception of several planned power reductions for maintenance, Unit 2 remained at 100 percent power through the end of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather Protection

a. Inspection Scope

The inspector conducted a review of Unit 2 actions to ensure protection of mitigating systems from adverse weather effects. The inspector verified that the preventive maintenance (PM) for the service water (SW) intake bar rack heaters were current and that the weekly checks were being performed. Procedures reviewed included N2-ESP-SWP-W790, Weekly SW Heater Current Test, and N2-ESP-SWP-R79, Refueling Cycle SW Heater Resistance Test. In addition, the inspector reviewed the preventive maintenance surveillance test data bank for any outstanding PM's on heat trace systems. The inspector reviewed special operating procedures and alarm response procedures for loss of service water to assess the adequacy of licensee actions in the event of an intake icing problem. The inspector reviewed the cold weather preparation check list and selected several items on the list and verified their successful completion.

The inspector performed a walkdown of the Unit 2 service water intake structure, service water pump rooms, and the emergency diesel generator equipment rooms as part of the inspection for adverse weather protection.

b. Issues and Findings

No findings of significance were identified.

1R04 Equipment Alignment

a. Inspection Scope

The inspectors conducted equipment alignment partial walkdowns primarily to evaluate the operability of selected trains or backup systems, while the redundant train or system was inoperable or out of service. Walkdowns were also conducted on equipment recently realigned due to surveillance testing. The walkdowns included, as appropriate, consideration of plant procedures and reviews of documents to determine correct system lineups, and verification of critical components to identify any discrepancies

which could affect operability of the redundant train or backup system. The inspectors performed the following partial system walkdowns:

- The inspectors performed a partial walkdown of the Unit 1 secondary containment after the licensee identified that the reactor building track bay roll-up door was found partially open on November 30, 2000, as documented in deviation/event report (DER) 1-2000-4308. The roll-up door served as the secondary containment boundary during the period that the outer track bay door was out of service for corrective maintenance.

- Division II Control Building Emergency Ventilation and Air Conditioning (Unit 2).

b. Issues and Findings

No findings of significance were identified.

1R05 Fire Protection

a. Inspection Scope

The inspectors conducted walk-downs of fire areas to determine if there was adequate control of transient combustibles and ignition sources. The condition of fire detection devices, the readiness of the sprinkler fire suppression systems and the fire doors were also inspected. In addition, the passive fire protection features were inspected, including the ventilation system fire dampers, structural steel fire proofing, and electrical penetration seals. The following plant areas were inspected:

- 288 foot elevation of the control building, including the relay room, cable tunnels, and air conditioning equipment rooms (Unit 2).

- 306 foot elevation of the control building, including the control room, cable tunnels and air conditioning equipment rooms (Unit 2).

- 600 volt switchgear room, located on the 289 foot elevation of the reactor building (Unit 2).

- General area reactor building (Unit 1).

b. Issues and Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification

a. Inspection Scope

A review was conducted of operating history documentation from a sampling of inspection reports, licensee event reports, licensee DERs, and the NRC plant issues matrix (PIM) from 1999 and 2000. The inspectors selected specific events which indicated possible training deficiencies and verified that they had been appropriately addressed.

The written and operating exams for licensed personnel for the examinations scheduled for the week of December 11, 2000, were reviewed. Content of the examinations was reviewed against the requirements of 10 CFR 55.59 and the NRC Examination Standards. Observations were made of the licensee's practices in administration of the operating tests to four crews (two crews at each unit) and the facility's evaluation of crew and individual operator performance.

The inspectors reviewed the simulator's performance and fidelity to the reference plant during simulator scenarios and job performance measures (JPM) performance. (See Attachment 1)

The results of the annual operating tests and biennial written exams for Units 1 and 2 were reviewed for overall performance.

A review was conducted of training department staff response to feedback by students and management.

Eleven of approximately one hundred operator medical records were reviewed. Records on training attendance for the two year requalification cycle for each unit, remedial training for four operators/crews, and maintaining an active license were also reviewed.

b. Issues and Findings

Reactivation

An operator was placed on inactive status on March 17, 2000, due to medical considerations. The individual stopped participation in the licensed operator requalification training program at that time. The operator was released by the medical department for return to duty on July 5, 2000. The operator resumed licensed duties on July 12, 2000, without being properly certified by management to have completed the requirements of 10 CFR55.53(f). However, this certification deficiency was identified and corrected on the same day the individual returned to licensed duties (July 12, 2000).

In addition, during a subsequent October 4, 2000 audit, the licensee determined that this same operator had not made-up training scheduled during the January-February 2000 Training Cycle 7. This training involved four tasks (Job Performance Measures) associated with abnormal and/or emergency conditions. The operator was promptly removed from licensed duties until the missed training was completed. This training

was also required to have been completed before returning to licensed duties on July 12, 2000.

The safety significance of this finding is very low due to the low probability of an event requiring these specific operator actions and no evidence that the operator would not have been able to complete the actions addressed by the requalification training sessions missed. However, this program/procedure issue is more than minor and has extenuating circumstances because, if left uncorrected, it has the potential for impacting the NRC's ability to perform its regulatory function. (No Color)

10 CFR55.53(f) states, in part, that before resumption of licensed duties, an authorized representative of the facility licensee shall certify that the qualifications and status of the licensee are current and valid. The issue is being treated as a non-cited violation (NCV) consistent with Section VI.A.1 of the NRC Enforcement Policy, issued on May 1, 2000, (65FR25368). The deficiency is in the licensee's corrective action program as DER-1-2000-3464. (**NCV 05000220/2000-010-01**)

License Renewals

In a separate audit, the licensee identified seven Unit 1 and seventeen Unit 2 licensed operators who missed requalification training between August 1994 and September 2000. Over one-half of these operators had renewed their licenses during this period and the facility had certified that requalification training had been completed.

A number of applicants missed required requalification training and therefore had not satisfactorily completed the requalification program. The missed requalification training was identified as part of action taken on DER-C-2000-2076 and the cause was programmatic and procedural related. Records of recent requalification training program completion, reviewed by the inspectors, indicated no further evidence of a problem in this area. The safety significance of this finding is very low because there is no evidence of poor in-plant performance due to missed training and there is no evidence of a deliberate act. However, this program/procedure issue is more than minor and has extenuating circumstances because, if left uncorrected, it has the potential for impacting the NRC's ability to perform its regulatory function. (No Color)

10 CFR55.57(a)(4) requires the licensee to provide a statement that the applicant for license renewal has satisfactorily completed the requalification program during the effective term of the current license. The issue is being treated as a non-cited violation consistent with Section VI.A.1 of the NRC Enforcement Policy, issued on May 1, 2000, (65FR25368). The deficiency is in the licensee's corrective action program as DER-1-2000-3464. (**NCV 05000220/2000-010-02 and 05000410/2000-010-02**)

If you contest either of the above stated NCVs, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001: with copies to the Regional Administrator, Region I; the Director, Office of Enforcement; and the NRC Resident Inspector at the Nine Mile Point Nuclear Power Plant.

1R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors reviewed performance based problems involving selected in-scope structures, systems, and components (SSCs) to assess the effectiveness of the maintenance program. Reviews focused on: 1) proper maintenance rule scoping, in accordance with 10 CFR 50.65; 2) characterization of failed SSCs; 3) safety significance classifications; 4) 10 CFR 50.65 (a)(1) and (a)(2) classifications; and, 5) the appropriateness of performance criteria for SSCs classified as (a)(2), and goals and corrective actions for SSCs classified as (a)(1). The inspectors reviewed the licensee's system scoping documents and system health reports. The following DERs were reviewed:

- DER 1-2000-3305 Reactor scram when placing reactor water cleanup in service (Unit 1).
- DER 1-2000-3417 Manual reactor scram and Unusual Event due to stuck open electromatic relief valve (ERV) (Unit 1).

b. Issues and Findings

No findings of significance were identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed operability evaluations affecting risk significant mitigating systems, to assess: (1) the technical adequacy of the evaluation; (2) whether continued system operability evaluations were warranted; (3) whether other existing degraded systems adversely impacted the affected system or compensatory measures; (4) where compensatory measures were used, whether the measures were appropriate and properly controlled; and (5) the degraded system's impact on technical specifications (TS) limiting condition for operations. The following DERs were reviewed:

- DER 1-2000-4171 Minimum drywell temperatures (Unit 1).
- DER 2-2000-4543 Failure of the test circuitry associated with the turbine stop valves (Unit 2).
- DER 2-2000-4159 Repetitive banging noise noted in 2RHS*MOV40B room which was subsequently determined to be from 2RHS*AOV39B, shutdown cooling inboard isolation check valve (Unit 2).

b. Issues and Findings

The inspectors concluded that the initial technical basis for operability of the shutdown cooling inside containment isolation check valve, 2RHS*MOV39B, was not adequate to demonstrate valve operability. Using acoustic monitoring techniques, NMPC determined that the mechanical noise emanating from the 2RHS*MOV40B (outside containment isolation valve) room was valve chatter from 2RHS*MOV39B. The initial technical analysis considered the observed mechanical noise (check valve chatter) as a normal flow induced valve noise signature and credited previous satisfactory leak rate testing results for valve operability. The inspectors noted that there was no consideration given to the potential long-term effect of disc chatter on the check valve's leak tight (reverse flow and containment isolation) functions. This issue was considered more than minor because the failure of the check valve to function could potentially result in the inability to maintain containment integrity. This concern was discussed with the responsible engineering staff.

NMPC engineering subsequently performed an engineering support analysis (ESA) and likewise concluded that the check valve's disc chatter could eventually adversely impact the valve's leak-tight integrity. The licensee consequently declared the valve inoperable pending confirmatory leak testing. An alternate leak rate test was performed on 2RHS-MOV39B and it was found to have no leakage. The valve was subsequently returned to an operable status.

The initial inadequate operability determination for the shutdown cooling inside containment isolation check valve was evaluated using the Significance Determination Process (SDP). This finding was of very low significance (Green), in that, the outside containment isolation valve is shut during normal plant operation and a subsequent alternate leak rate test determined that valve 2RHS-MOV39B would perform its intended safety function. The licensee tracked this inspector identified issue in their corrective action program under DER 2-2000-4159.

1R16 Operator Workarounds

a. Inspection Scope

The inspector reviewed operator workarounds at Unit 2 to determine if any had a potential adverse effect on the functionality of mitigating systems. Included in this review were the cumulative effects of operator workarounds on: (1) the reliability, availability, and potential for mis-operation of a system; (2) the potential increase in initiating event frequency that could affect multiple mitigating systems; and (3) the ability of operators to respond in a correct and timely manner to plant transients and accidents.

b. Issues and Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing

a. Inspection Scope

The inspectors reviewed post-maintenance testing (PMT) procedures and associated testing activities for selected risk significant mitigating systems to assess whether: (1) the effect of testing on the plant had been adequately addressed by control room and engineering personnel; (2) testing was adequate for the maintenance Work Order (WO) performed; (3) acceptance criteria were clear and adequately demonstrated operational readiness, consistent with the design and licensing basis documents; (4) test instrumentation had current calibrations, range, and accuracy for the application; (5) tests were performed, as written, with applicable prerequisites satisfied; (6) jumpers installed or leads lifted were properly controlled; (7) test equipment was removed following testing; and (8) equipment was returned to the status required to perform its safety function.

- WO 00-19607-00 — Control relay replacement for the "A" service water pump discharge isolation valve, 2SWP*MOV74A (Unit 2).
- Action Request (ACR) 00-00948 — Testing of fire damper 2HVR-DMPF22 following resetting of the actuation linkage (Unit 2).

b. Issues and Findings

No findings of significance were identified.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors witnessed performance of surveillance test procedures and reviewed test data of selected risk significant structure, system, and components (SSCs) to assess whether the SSCs satisfied Technical Specifications, Updated Final Safety Analysis Report (UFSAR), and licensee procedure requirements; and to determine if the testing appropriately demonstrated that the SSCs were operationally ready and capable of performing their intended safety functions. The following tests were witnessed:

- N1-ISP-040-001 Rev 1, Core Spray Header Differential Pressure Instrument Channel Test/Calibration (Unit 1).
- N1-ST-Q6B Rev 06, Containment Spray System Loop 121 Quarterly Operability Test (Unit 1).

- N2-OSP-CSH-Q@002, High Pressure Core Spray (HPCS) Pump and Valve Operability and System Integrity Test (Unit 2).
- N2-ISP-CSH-R101, Operating Cycle Calibration of HPCS Suction Transfer on High Suppression Pool Level Instrument Channels (Unit 2).

b. Issues and Findings

The inspector determined that N2-OSP-CSH-Q@002 was not adequately testing the reverse flow safety function of the HPCS pump discharge check valve (2CSH*V9). Following a discussion and review with the NMPC engineering staff, it was determined that the valve's safety function included keeping the discharge piping full of water following the loss of power to the keep-fill system. Ensuring the discharge piping is kept full and performing a periodic test to appropriately ensure that the piping is full is significant to minimizing the potential for damage from water hammer and ensuring timely injection of water to the core in an accident scenario.

This inspector identified inadequate test method was evaluated using the SDP. Due to the very low probability of a loss of offsite power (LOOP) coincident with a small break loss of coolant accident (SBLOCA), this issue was determined to be of very low safety significance. (Green)

The failure to properly test the reverse flow safety function of the HPCS pump discharge check valve constitutes a violation of 10CFR50, Appendix B, Criterion XI, “Test Control.” However, because of the low safety significance of this issue and because the licensee has included this issue in their corrective action program, this test control violation is being treated as a Non-Cited Violation, consistent with Section VI.A.1 of the NRC Enforcement Policy, issued on May 1, 2000, (65FR25368). **(NCV 05000410/2000-010-03)** NMPC entered this finding into their corrective action program as DER-2-2000-4622.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS1 Access Control of Radiologically Significant Areas

a. Inspection Scope

Plant walkdowns and independent surveys were conducted during full power operating conditions in all exposure significant locations of Nine Mile Point Units 1 and 2 turbine buildings, radwaste buildings, and reactor buildings. All high radiation areas were reviewed for appropriate postings and control barriers. Administrative controls of locked high radiation areas and very high radiation areas were reviewed to include a procedure review and a physical key inventory at the Unit 1 and 2 radiologically controlled area (RCA) access points and the Unit 1 and 2 control rooms.

Access controls associated with highly activated and contaminated components in the Unit 2 spent fuel pool were observed.

Review of access control into the Unit 1 outer Transverse In-Core Probe (TIP) room during electrical equipment upgrade work was observed.

Briefing of radiological conditions to workers was observed at both Unit 1 and Unit 2 RCA access points.

Approximately fourteen Deviation/Event Reports (DERs) associated with high radiation area access controls were reviewed.

b. Issues and Findings

No findings of significance were identified.

2OS3 Radiation Monitoring Instrumentation

a. Inspection Scope

The inspector reviewed calibration methods and documentation of current calibrations of the following sources used for the calibration of radiation monitoring instrumentation:

Shepherd 89 calibrator, Shepherd 28-5 open air calibrator, Shepherd 142-10 panoramic calibrator, Eberline 1000B multi-source calibrator, high and low well calibrators, and Tech Ops Area Radiation Monitor (ARM) portable calibrator.

The below listed radiation monitoring instrument calibrations were conducted and observed during the inspection to verify conformance with industry standards and procedural requirements. These instruments were selected based on their impact on protection of occupational workers in the plant.

- Unit 2 reactor building basement area radiation monitor No. 102.
- Unit 1 high radiation reactor building exhaust ventilation duct radiation monitor channel Nos. 11 and 12
- Unit 2 Post-Accident Sampling Station (PASS) radiation monitors

Portable health physics survey instrument calibration methods and selected in-use instrument calibration documents were reviewed for the following radiation survey instruments, contamination survey instruments, personnel electronic dosimeters, and air sample counting instruments: Eberline 6112B teletectors; Eberline RO-2/2A ion chambers; Eberline AMS-3 continuous air monitors; NNC Friskall personnel contamination monitors; Small Article Monitors; Digidose 100 electronic dosimeters; Eberline BC-4 beta counters; Eberline SAC-4 alpha counters; and high purity germanium gamma counters.

Emergency Plan specified self contained breathing apparatus (SCBA) locations in both Unit 1 and Unit 2 control rooms, the Unit 1 Administration Building 261 foot elevation, the Unit 2 access passage 261 foot elevation, and the Unit 1 SCBA air compressor room were visited and the SCBA units and spare breathing air bottles were examined for operability and licensee inspection history. The current control room shift staffing roster was utilized to review selected plant operators for currency of SCBA use qualifications.

Condition reports, associated with radiation monitoring instrumentation or emergency SCBA use, were reviewed for the period beginning January 1, 2000 through November 13, 2000.

b. Issues and Findings

No findings of significance were identified.

3. SAFEGUARDS

Cornerstone: Physical Protection

3PP1 Access Authorization Program

a. Inspection Scope

A variety of activities were conducted to determine the effectiveness of the licensee's behavior observation portion of the personnel screening and fitness-for-duty programs. Five supervisors representing the Maintenance, Chemistry, Radiation Protection, Procurement and Instrumentation & Control Departments were interviewed, on November 14 and 15, 2000, regarding their understanding of behavior observation responsibilities and the ability to recognize aberrant behavior traits. In addition, these individuals were interviewed to establish their knowledge level relative to their responsibilities when performing escort duties. Two Access Authorization/Fitness-for-Duty self-assessments, an audit report, and event reports and loggable events for the four previous quarters were reviewed during this inspection. Behavior observation training procedures and records were also reviewed.

b. Issues and Findings

No findings of significance were identified.

3PP2 Access Control

a. Inspection Scope

A number of activities were conducted during the period of November 13-16, to verify that the licensee had effective site access controls, and equipment in place designed to detect and prevent the introduction of contraband (firearms, explosives, incendiary devices) into the protected area. A random sample of personnel vital area access approvals, which granted individuals unescorted access to various protected and vital areas, was reviewed to assure that they were properly screened, identified, and authorized. Site access control activities were observed, including personnel and package processing through the search equipment at both access points during peak ingress periods on November 13, 14, 15 and 16, and vehicle searches, on November 15. On November 14, testing of all access control equipment, including the metal detectors, explosive material detectors, and X-ray examination equipment at both access points, was observed. The Access Control event log, an audit report, and three maintenance work requests were also reviewed.

b. Issues and Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA2 Performance Indicator Verification

a. Inspection Scope

The inspector reviewed the licensee's programs for gathering and submitting data for the Fitness-for-Duty, Personnel Screening, and Protected Area Security Equipment Performance Indicators. The review included the licensee's tracking and trending reports, personnel interviews and security event reports for the Performance Indicator data submitted from the 1st quarter of 1999 through the 3rd quarter of 2000.

b. Issues and Findings

No findings of significance were identified.

4OA6 Management Meetings

Exit Meeting Summary

The inspectors presented the inspection results to Mr. J. Conway, Vice President, Nuclear Generation and other members of licensee management at the conclusion of the inspection on January 12, 2001. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any of the material examined during the inspection should be considered proprietary. No proprietary information was identified.

4OA7 Licensee Identified Violations

The following findings of very low significance were identified by the licensee and are violations of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600, for being dispositioned as Non-Cited Violations (NCVs).

NCV 05000220/2000-010-01:

10 CFR55.53(f) requires that before resumption of licensed duties, an authorized representative of the facility licensee shall certify that the qualifications and status of the licensee are current and valid. An operator resumed licensed duties on July 12, 2000, without having completed the necessary requalification training and being properly certified by facility management. (reference Section 1R11)

NCV 05000220/2000-010-02 and 05000410/2000-010-02:

10 CFR55.57(a)(4) requires the licensee to provide a statement that the applicant for license renewal has satisfactorily completed the requalification program during the effective term of the current license. Twenty-four licensed operators missed requalification training between August 1994 and September 2000 and over one-half of these operators had renewed their licenses during this period without proper certification that requalification training had been completed. (reference Section 1R11)

PARTIAL LIST OF PERSONS CONTACTED

Licensee

R. Abbott, Vice President Engineering
J. Conway, VP Nuclear Generation
D. Barcomb, Unit 2 Radiation Protection Manager
H. Christensen, Security Manager
L. Hopkins, Unit 1 Plant Manager
J. Mueller, Senior Vice President and Chief Nuclear Officer
M. Peckham, Unit 2 Plant Manager
L. Pisano, Manager, Nuclear Training
V. Schuman, Unit 1 Radiation Protection Manager
C. Terry, Vice President Quality Assurance Nuclear
D. Wolniak, Manager, Licensing

NRC

J. Colaccino, NRR, Division of Engineering
R. Conte, Chief, Operations Safety Branch
D. Dempsey, Reactor Engineer
L. Scholl, Senior Reactor Engineer
J. Trapp, Senior Reactor Analyst

ITEMS OPENED AND CLOSED

Items Opened and Closed

05000220/2000-010-01	NCV	An operator re-activated his license and performed licensed duties without meeting the requirements of 10CFR55.53(f).
05000220/2000-010-02 05000410/2000-010-02	NCV	Statements were provided as required by 10CFR55.57(a)(4) for a number of applicants that indicated they had satisfactorily completed the requalification program when the required requalification training had not been completed.
05000410/2000-010-03	NCV	Failure to adequately test the HPCS pump discharge check valve per 10CFR50, Appendix B, Criterion XI.

LIST OF ACRONYMS USED

ACR	Action Request
ARM	Area Radiation Monitor
DER	Deviation/Event Report
ERV	Electromatic Relief Valve
ESA	Engineering Support Analysis
JPM	Job Performance Measures
HPCS	High Pressure Core Spray
LOOP	Loss of Offsite Power
NCV	Non-Cited Violation
PASS	Post-Accident Sample System
PM	Preventive Maintenance
PMT	Post-Maintenance Testing
RCA	Radiologically Controlled Area
SBLOCA	Small Break Loss of Coolant Accident
SCBA	Self-Contained Breathing Apparatus
SDP	Significance Determination Process
SSC	Structures, Systems and Components
SW	Service Water
TIP	Transverse In-Core Probe
TS	Technical Specification
Unit 1	Nine Mile Point Unit 1
Unit 2	Nine Mile Point Unit 2
UFSAR	Updated Final Safety Analysis Report
WO	Work Order

PARTIAL LIST OF DOCUMENTS REVIEWED

Calibration of the High and Low Level Instrument Calibration Wells, S-RTP-14, Rev. 4

Operation and Calibration of the Shepherd Irradiator Range Model 89 and Model 28 Single Source Beam Calibration System, N2-RTP-164, Rev. 1

Operation and Calibration of the Eberline Multiple Source Gamma Calibrator - Model 1000B, S-RTP-3

Operation and Calibration of the Shepherd Model 142 Panoramic Irradiator, S-RTP-94, Rev. 2

Control and Issue of Radiation Protection Instruments, S-RAP-RPP-102

Operation and Calibration of the Teletector, S-RTP-16, Rev. 16

Operation and Calibration of the Eberline Ion Chamber Model RO-2/RO-2A Beta Gamma Dose Rate Instrument, S-RTP-52, Rev. 5

Operation and Calibration of the NNC Friskall IIa/IIb/III-20 Whole Body Contamination Monitors, S-RTP-122, Rev. 4

Channel Calibration Test of the DRMS Area Radiation Monitor with G-M Detectors, N2-RTP-111, Rev. 5

Instrument Channel Calibration of High Radiation Reactor Building Ventilation Duct Radiation Monitors, N1-RSP-120, Rev. 6

Fitness for Duty Lesson Plan, TECH-GET-PAT-WHT-3-0/3-2, January, 2000
Audit 00005: Security, Safeguards and Fitness for Duty, March 31, 2000

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Nuclear Security Department, Vital Area Key Program, Self-Assessment, May, 2000

Security Event Log, September, 1999 - November, 2000

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High Radiation Area Monitoring and Control, S-RAP-RPP-0801, Rev. 9

Posting Radiological Areas, S-RAP-RPP-0103, Rev. 12.

Deviation Event Reports (DERs)

1-2000-1274
1-2000-1556
1-2000-2061
1-2000-3718
1-2000-2789
1-2000-3863
1-2000-3987
C-2000-1657
2-2000-1425
2-2000-1537
2-2000-2202
2-2000-3722
2-2000-4172
2-2000-3295

ATTACHMENT 1

ES501 Simulation Facility Report

Facility Licensee: Nine Mile Point Unit 1

Facility Docket No: 05000220

Operating Test Administered on: December 12, 2000

This form is to be used to report observations required by Inspection Procedure 71111 Attachment 11. These observations do not constitute audit or inspection findings and, without further verification and review, are not indicative of noncompliance with 10 CFR 55.45(b). These observations do not affect NRC certification or approval of the simulation facility other than to provide information that may be used in future evaluations. No licensee action is required in response to these observations.

While conducting the simulator portion of the operating tests, and during evaluations of operator performance, the licensee determined the following condition.

During an evaluated annual examination scenario on December 12, 2000, crew and individual evaluations were affected by incorrect logic modeling in the start circuit of the feedwater pumps. Specifically, electric feed pump No. 12 did not auto-start when removed from pull-to-lock with a HPCI signal present, nor were actions for manual start consistent with expected switch operation. Simulator Discrepancy Report No. 1-2998 has been initiated to investigate and correct the logic modeling discrepancy.

ATTACHMENT 2

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety	Radiation Safety	Safeguards
● Initiating Events	● Occupational	● Physical Protection
● Mitigating Systems	● Public	
● Barrier Integrity		
● Emergency Preparedness		

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.