Exelon Generation®

10 CFR 50.73

NMP2L 2618
March 31, 2016

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Nine Mile Point Nuclear Station, Unit 2
Renewed Facility Operating License No. NPF-69
Docket No. 50-410

Subject: NMP2 Licensee Event Report 2015-003 Revision 1, Primary Containment Isolation Function For Some Valves Not Maintained During Surveillance Testing

NMP2 Licensee Event Report 2015-003, Primary Containment Isolation Function For Some Valves Not Maintained During Surveillance Testing, was submitted on August 21, 2015 in accordance with 10 CFR 50.73(a)(2)(v)(C). The LER has been revised to report a Safety System Functional Failure.

There are no regulatory commitments contained in this letter.

Should you have any questions regarding the information in this submittal, please contact Dennis Moore, Regulatory Assurance Manager, at (315) 349-5219.

Respectfully,

Robert E. Kreider Jr.
Plant Manager, Nine Mile Point Nuclear Station
Exelon Generation Company, LLC

REK/BTV

Enclosure: NMP2 Licensee Event Report 2015-003 Revision 1, Primary Containment Isolation Function For Some Valves Not Maintained During Surveillance Testing

cc: NRC Regional Administrator, Region I
NRC Resident Inspector
NRC Project Manager

IE22
NRR

Enclosure

NMP2 Licensee Event Report 2015-003 Revision 1

Primary Containment Isolation Function For Some Valves
Not Maintained During Surveillance Testing

NRC FORM 366 (02-2014) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 01/31/2017

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block)

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4. TITLE

Primary Containment Isolation Function for some valves not maintained during Surveillance Testing

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
									N/A	N/A
6	23	2015	2015	- 003 -	01	3	31	2016	FACILITY NAME: N/A	DOCKET NUMBER: N/A

9. OPERATING MODE	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: *(Check all that apply)*			
1	☐ 20.2201(b)	☐ 20.2203(a)(3)(i)	☐ 50.73(a)(2)(i)(C)	☐ 50.73(a)(2)(vii)
	☐ 20.2201(d)	☐ 20.2203(a)(3)(ii)	☐ 50.73(a)(2)(ii)(A)	☐ 50.73(a)(2)(viii)(A)
	☐ 20.2203(a)(1)	☐ 20.2203(a)(4)	☐ 50.73(a)(2)(ii)(B)	☐ 50.73(a)(2)(viii)(B)
	☐ 20.2203(a)(2)(i)	☐ 50.36(c)(1)(i)(A)	☐ 50.73(a)(2)(iii)	☐ 50.73(a)(2)(ix)(A)
10. POWER LEVEL	☐ 20.2203(a)(2)(ii)	☐ 50.36(c)(1)(ii)(A)	☐ 50.73(a)(2)(iv)(A)	☐ 50.73(a)(2)(x)
	☐ 20.2203(a)(2)(iii)	☐ 50.36(c)(2)	☐ 50.73(a)(2)(v)(A)	☐ 73.71(a)(4)
100	☐ 20.2203(a)(2)(iv)	☐ 50.46(a)(3)(ii)	☐ 50.73(a)(2)(v)(B)	☐ 73.71(a)(5)
	☐ 20.2203(a)(2)(v)	☐ 50.73(a)(2)(i)(A)	☒ 50.73(a)(2)(v)(C)	☐ OTHER
	☐ 20.2203(a)(2)(vi)	☐ 50.73(a)(2)(i)(B)	☐ 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

LICENSEE CONTACT	TELEPHONE NUMBER *(Include Area Code)*
Dennis M. Moore, Site Regulatory Assurance Manager	(315) 349-5219

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

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

14. SUPPLEMENTAL REPORT EXPECTED	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
☐ YES *(If yes, complete 15. EXPECTED SUBMISSION DATE)* ☒ NO		N/A	N/A	N/A

ABSTRACT *(Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)*

On June 23, 2015, Nine Mile Point Unit 2 identified two separate instances where the isolation capability for the Reactor Vessel Low Water Level (Level 2) primary containment isolation valves on both divisions was not maintained during performance of surveillance testing. The events occurred on April 22, 2015, and May 5, 2015. This event is reportable under 10 CFR 50.73 (a)(2)(v)(C) as an event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to control the release of radioactive material. The Surveillance testing on both dates was for valves powered by one division. To prevent an inadvertent full isolation signal from occurring during the testing on the division, the power supply breakers for the division valves were opened while they were being tested.

The event described in this LER is documented in the station's corrective action program as IR2518177. There are no similar event reports.

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I. DESCRIPTION OF EVENT

A. PRE-EVENT PLANT CONDITIONS:

Prior to the event, Nine Mile Point Unit 2 (NMP2) was operating at 100 percent power.

B. EVENT:

This event was discovered on June 23, 2015 during a management review.

On April 22, 2015, the Primary Containment Isolation function for the Reactor Building Closed Loop Cooling and Reactor Water Cleanup valves was inadvertently defeated for 47 minutes during surveillance testing.

On May 8, 2015, the valves for the opposite division in the same systems were similarly impacted for 50 minutes during surveillance testing of the opposite division.

This resulted in an inadvertent loss of the Reactor Vessel Water Level (Level 2) Primary Containment Isolation Safety Function.

Nine Mile Point Unit 1 (NMP1) was unaffected by the surveillance at NMP2.

The event has been entered into the station's corrective action program as IR 2518177.

C. OTHER SYSTEMS OR SECONDARY FUNCTIONS AFFECTED:

No other systems or secondary functions were affected beyond the systems discussed in Section I.B. There were no safety system actuations during this time frame.

II. CAUSE OF EVENT:

The Surveillance testing on April 22 was for valves powered by Division 2. To prevent an inadvertent full isolation signal from occurring during the testing on Division 2, the power supply breakers for the Division 2 valves was opened while they were being tested. The plan was to prevent a system actuation during testing, but ensure the ability to maintain isolation capability because the Division 1 side was not impacted.

During work preparation activities, an error was made resulting in the work order steps for opening the power supply breakers to prevent inadvertent closure of the primary containment isolation valves. Personnel did not recognize that performing the surveillance on two of the trip units for Division 2 would result in losing the closure capability for the opposite division (Division 1) outboard primary containment isolation valves. This resulted in a loss of automatic primary containment isolation

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function on Reactor Vessel Low Water level, Level 2, during the time of the testing of the two trip units.

The same error was made on May 5 during Division 1 testing.

III. ANALYSIS OF THE EVENT:

This event is reportable under 10 CFR 50.73 (a)(2)(v)(C) as an event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to control the release of radioactive material.

On the two dates above, both containment isolation valves (inboard and outboard) for those systems would not have closed if an automatic Reactor Vessel Low Water Level 2 Isolation signal was generated. One division of valves had the breakers open preventing closure, while the other division Level 2 Isolation was bypassed for testing.

There were no actual nuclear safety consequences associated with this event. The consequences of the event were mitigated by the diversity of trip initiation for pipe breaks inside the primary containment being provided by monitoring drywell high pressure and associated circuitry for providing a primary containment isolation signal to isolate the valves on a Drywell High Pressure signal.

Based on the above discussion, it is concluded that the safety significance of this event is low and the event did not pose a threat to the health and safety of the public or plant personnel.

This event constitutes a safety system functional failure. The NRC Reactor Oversight Process indicator for Safety System Functional Failures at Unit 2 will increase from 0 to 1 and remain green.

IV. CORRECTIVE ACTIONS:

A. ACTION TAKEN TO RETURN AFFECTED SYSTEMS TO PRE-EVENT NORMAL STATUS:

The plant was returned to pre-event normal status after the completion of each surveillance.

B. ACTION TAKEN OR PLANNED TO PREVENT RECURRENCE:

The procedures for performing the surveillance have been revised to ensure the correct power supply breakers are opened for each section of the surveillance.

V. ADDITIONAL INFORMATION:

A. FAILED COMPONENTS:

There were no failed components that contributed to this event.

B. PREVIOUS LERs ON SIMILAR EVENTS:

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There are no similar LERs for NMP2.

C. THE ENERGY INDUSTRY IDENTIFICATION SYSTEM (EIIS) COMPONENT FUNCTION IDENTIFIER AND SYSTEM NAME OF EACH COMPONENT OR SYSTEM REFERRED TO IN THIS LER:

COMPONENT	IEEE 803 FUNCTION IDENTIFIER	IEEE 805 SYSTEM IDENTIFICATION
Primary Containment	NA	JM
Isolation Valve	ISV	JM

D. SPECIAL COMMENTS:

None