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April 29, 1996  
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RICHARD B. ABBOTT  
Vice President and  
General Manager - Nuclear

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: Nine Mile Point Unit 1  
Docket No. 50-220  
DPR-63

**Subject:** *RESPONSE TO NOTICE OF VIOLATION*  
*NRC Inspection Report No. 50-220/95-24 and 50-410/95-24*

Gentlemen:

The purpose of this letter is to supplement our response to Notice of Violation 95-24-01 submitted on February 22, 1996. In addition, this letter responds to your letter dated April 10, 1996. The preventative actions taken for each of the identified causes are as follows:

#### ITEM 1

The cause for not replacing the 68 NE Agastat relays was attributed to lack of a thorough review of the Wyle report. The corrective action addressed only EQ relays. Our preventative action with regard to the non-EQ relays is as follows:

The service life of the newly installed non-EQ and EQ normally energized Agastat GP series relays (4.5 years) as well as the normally de-energized relays (21.94 years) has also been incorporated into the Preventative Maintenance and Surveillance Test (PMST) database to facilitate tracking the end of the service life.

#### ITEM 2

The analysis of relay failures due to age and thermal degradation was based on a position paper. The preventative action with regard to this position paper is as follows:

The relevant aspects of the January 1988 position paper for Surveillance and Maintenance programs for safety-related equipment located in a mild environment has been included in the following procedures: NDD-MAI, "Maintenance" issued 6/93, NDD-REL, "Station Reliability" issued 12/94 and GAP-MAI-05, "Preventative Maintenance Program" issued 1/95.

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Today, if a service life problem similar in nature to the Agastat GP series relay issued is identified via an Information Notice, a Deviation/Event Report (DER) would be generated. Part of the DER's preventive actions would be to update the PMST database with the component's updated service life to facilitate replacement and to revisit the technical evaluation of the component's preventive maintenance frequency as defined by Procedure NDD-MAI, "Maintenance."

### ITEM 3

The preventative action taken with regard to inadequate management oversight is as follows:

A lessons learned transmittal was issued for NMPC's failure to properly evaluate operating experience concerns. The lessons learned were communicated to applicable departments. The management expectation of providing the necessary oversight for operating experience concerns was emphasized.

### ITEM 4

The failure to address OE items was attributed to the fact that AP-4.3.2, "Operating Experience Assessment" did not require low level OE reports to be evaluated. The preventative action with regard to the evaluation of OE items is as follows:

The evaluation of operating experience information has also improved significantly since Procedure AP-4.3.2, "Operating Experience Assessment" was in effect. Experienced personnel are more sensitive to industry events as they may apply to Nine Mile Point. The Deviation/Event Report (DER) system is now used to evaluate and track operating experience information on a formal basis. Procedure NIP-ECA-01 requires action plans/corrective actions and preventative actions to be developed to address applicable issues. These corrective actions are reviewed and approved by appropriate levels of management prior to implementation and are tracked until completion. A lessons learned has been issued to reinforce management expectations regarding the generation of DERs for applicable operating experience items.

We trust that this supplement addresses your request for additional information.

Very truly yours,



R. B. Abbott

Vice President and General Manager - Nuclear

RBA/TPM/kap

xc: Regional Administrator, Region I  
Mr. B. S. Norris, Senior Resident Inspector  
Mr. D. S. Hood, Senior Project Manager, NRR  
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