

James A. FitzPatrick  
Nuclear Power Plant  
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Michael J. Colomb  
Plant Manager

November 27, 1996  
JAFP-96-0474

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D.C. 20555

SUBJECT: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Reply to Notice of Violation  
NRC Inspection Report 50-333/96-06

Gentlemen:

In accordance with the provisions of 10 CFR 2.201, Notice of Violation, the Authority submits a response to the notice transmitted by your letter dated October 23, 1996. Your letter refers to the results of the integrated inspection completed at the James A. FitzPatrick Nuclear Power Plant on September 28, 1996.

Attachment I provides the description of the violations, reason for the violations, the corrective actions that have been taken and the results achieved, and the date of full compliance.

Attachment II provides the summary of commitments.

If you have any question, please contact Mr. Richard Plasse at (315) 349-6793.

Very truly yours,

A handwritten signature in cursive script, likely belonging to Michael J. Colomb.

MICHAEL J. COLOMB

MJC:GB:las  
Attachments

cc: next page

060013

STATE OF NEW YORK  
COUNTY OF OSWEGO  
Subscribed and sworn to before me  
this 27 day of November, 1996

A handwritten signature in cursive script, likely belonging to Nancy B. Czerew.  
NOTARY PUBLIC

9612060107 961127  
PDR ADDCK 05000333  
Q PDR

NANCY B. CZEREW  
Notary Public State of New York  
My Comm. Expires 1-28-97

cc: Regional Administrator  
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Attachments:

- I. Reply to Notice of Violation
- II. Summary of Commitments

**Attachment I to JAFP-96-0474  
Reply to Notice of Violation 96-06**

**VIOLATION**

- A. Technical Specification 6.8.(A)1 requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5 of American National Standards Institute (ANSI) 18.7-1972 "Facility Administrative Policies and Procedures." Section 5.1.2 of ANSI 18.7-1972 states in part, that procedures shall be followed, and the requirements for use of procedures shall be prescribed in writing.

Contrary to the above, on September 16, 1996, during work associated with WR 96-02875-00, to perform calibration of 71-59N-1UPRN05, two instances occurred where procedures were not followed and the failure to follow these procedures resulted in a reactor trip. The following examples were cited:

(1) Administrative Procedure (AP) 10.03, Work Package Planning, step 8.1.5 states where accessible, perform a walkdown of the work site to obtain an understanding of the specific needs and location of the work environment. However, failure to adequately walkdown the work associated with WR 96-02875-00, to perform calibration of 71-59N-1UPRN05, was not performed with adequate detail to identify the high risk involved with performing the maintenance with the plant at power.

(2) Instrument Maintenance Procedure IMP-G20, Generic Troubleshooting and Maintenance Procedure, states, that prior to disconnecting wires, ensure any adverse affects on plant equipment operation or operational status have been discussed with applicable Control Room Operator(s) and Shift Manager. However, during the calibration of 71-59N-1UPRN05, when the technician determined that the work had the potential to adversely affect the operation of the plant, he failed to notify control room operators or the shift manager.

This is a Severity Level IV Violation (Supplement 1).

**ADMISSION OR DENIAL OF THE ALLEGED VIOLATION**

The Authority agrees with this violation.

**Attachment I to JAFP-96-0474  
Reply to Notice of Violation 96-06**

**REASONS FOR THE VIOLATION**

The cause for this violation was personnel error. The performance factors leading to these errors were:

- Inadequate work organization and planning.

The individual in the Central Planning Department assigned responsibility for preparing the work package did not perform an adequate evaluation and walkdown of the work activity prior to releasing the work to the field. This resulted in: (1) the failure of the work package to identify the proximity of sensitive energized equipment; and (2) the failure of the work package to identify work steps with high risks and potential impact on plant operation;

- Ineffective worker practices.

The Instrument and Control (I&C) lead technician assigned responsibility for work associated with calibration of the relay, upon commencing the work, was confronted with an unexpected electrical termination configuration. He also recognized and communicated to another technician that the work package did not contain reference to the potential high risk associated with the work evolution. However, upon identifying these conditions: (1) the lead technician failed to stop work, question the adequacy of the work plan and report the deficient work package condition to supervision; and (2) both technicians failed to properly protect adjacent energized equipment from accidental shorting and grounding prior to commencing the work activity. Had the adequacy of the work plan been challenged, the work would have been either rescheduled during a plant outage to reduce plant impact or the work package would have been revised to specify precautions to be taken when working in close proximity to energized equipment.

**CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN**

- The procedures which govern the work control, work package planning and the rolling work schedule have been revised to: (1) strengthen the process for identifying plant work with the potential to have an impact on plant operations; and (2) exclude risk significant work from the minor maintenance process.
- Instrument Maintenance Procedure IMP-G20 was revised to add steps to require preventive measures be taken to protect against accidental shorting or grounding of lifted leads and jumpers when performing maintenance or testing activities.
- Training on the procedure changes was conducted with the plant staff.

**Attachment I to JAFP-96-0474  
Reply to Notice of Violation 96-06**

**CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN (cont)**

- The persons responsible for the development of the work package and the calibration of the relay have been counseled with respect to their performance, management expectations regarding the need for pre-job walkdowns of work packages, the need to maintain a questioning attitude, precautions to be taken when working on or near energized circuits, and the importance of stopping work and communicating with supervision when confronted with unexpected work conditions.
- Following this event, a training session was conducted for the Instrument and Controls Department to review lessons learned from this incident.
- Following this event, special "stand-down" meetings were held with plant staff to discuss the circumstances associated with the event. Additionally, a training package was prepared and presented to department personnel. The package outlined the basic causes and operational significance of the event. The purpose of this package was to reinforce management's expectations regarding the need to identify and appropriately control risk.

**RESULTS ACHIEVED**

The Power Authority believes the corrective actions taken were effective in preventing recurrence. A heightened awareness of the issues associated with this violation has been achieved. The Authority will continue to reinforce the importance of pre-job preparation activities and emphasize the necessity to identify, communicate and appropriately control high risk evolutions.

**CORRECTIVE ACTIONS TO BE TAKEN**

A training module is under development to improve worker awareness and enhance work practices when working on or near energized circuits. The module subject matter will include increasing worker awareness of potential risk(s) and plant impact of tasks being performed, protective measures for tools to avoid electrical shorting, protecting lifted leads/jumpers from shorting/grounding, and electrical protection of adjacent equipment. The module will be required training for I&C, Electrical Maintenance and Operations Department personnel. Scheduled completion date for this training is March 31, 1997.

Attachment I to JAFP-96-0474  
Reply to Notice of Violation 96-06

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Management expectations for a successful work control program have been and continue to be reinforced. Full compliance was achieved on September 20, 1996 following completion of departmental "stand-down" meetings.

Attachment II to JAFP-96-0474

Summary of Commitments

Number	Commitment	Due Date
JAFP-96-0474-01	A training module is under development to improve worker awareness and enhance work practices when working on or near energized circuits. The module subject matter will include: increasing worker awareness of potential risk(s) and plant impact of tasks being performed; protective measures for tools to avoid electrical shorting; protecting lifted leads/jumpers from shorting/grounding; and electrical protection of adjacent equipment. This module will be required training for I&C, Electrical Maintenance and Operations Department personnel.	03/31/97