

Indiana Michigan
Power Company
Cook Nuclear Plant
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Bridgman, MI 49106
616-465-5901



April 5, 2000

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Operating Licenses DPR-58 and DPR-74
Docket Nos. 50-315 and 50-316

Document Control Manager:

In accordance with the criteria established by 10 CFR 50.73 entitled Licensee Event Report System, the following report is being submitted:

LER 315/99-010-01, Retraction – "Reactor Coolant System Leak Detection System Sensitivity Not in Accordance with Design Requirements"

No commitments were identified in this submittal.

Should you have any questions regarding this correspondence, please contact Mr. Robert C. Godley, Director, Regulatory Affairs, at 616/465-5901, extension 2698.

Sincerely,

A handwritten signature in black ink that reads 'M. W. Rencheck'.

M. W. Rencheck
Vice President – Nuclear Engineering

/mbd
Attachment

c: J. E. Dyer, Region III
R. C. Godley
D. Hahn
W. J. Kropp
R. P. Powers
R. Whale
Records Center, INPO
NRC Resident Inspector

JE22

FACILITY NAME (1)
 Cook Nuclear Plant Unit 1

DOCKET NUMBER (2)
 05000-315

PAGE (3)
 1 OF 2

TITLE (4)
 Retraction - Reactor Coolant System Leak Detection System Sensitivity Not in Accordance with Design Requirements

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
04	01	1999	1999	010	01	03	06	2000	Cook Nuclear Plant Unit 2	05000-316
									FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	DEFUEL	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)	N/A	20.2201(b)	20.2203(a)(2)(v)		50.73(a)(2)(i)		50.73(a)(2)(viii)		
		20.2203(a)(1)	20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)		
		20.2203(a)(2)(i)	20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71		
		20.2203(a)(2)(ii)	20.2203(a)(4)		50.73(a)(2)(iv)		X OTHER		
		20.2203(a)(2)(iii)	50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below		
		20.2203(a)(2)(iv)	50.36(c)(2)		50.73(a)(2)(vii)		or in NRC Form 366A		

LICENSEE CONTACT FOR THIS LER (12)

NAME
 M. B. Depuydt, Regulatory Compliance

TELEPHONE NUMBER (Include Area Code)
 (616) 465-5901 X 1589

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE).	NO						

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

This revision replaces LER 315/99-010-00 in its entirety.

On April 1, 1999, with both Units in Mode 5, it was concluded that the containment sump level and flow monitoring subsystem of the Reactor Coolant System (RCS) Leakage Detection System was not consistent with the design recommendations of Regulatory Guide (RG) 1.45 as stated in Technical Specification (T/S) Bases 3/4.4.6.1. As the containment sump level and flow monitoring subsystem was not capable of detecting a change in leakage rate of one gpm in one hour or less, it was considered historically inoperable. This condition was originally reported under 10CFR50.73(a)(2)(l)(B) as a condition prohibited by the plant's T/S.

Subsequent investigation has determined that wording in the T/S Bases 3/4.4.6.1 was not clear and was misinterpreted when this issue was initially reported. The Bases stated that the Reactor Coolant Pressure Boundary leakage detection systems are consistent with the recommendations of RG 1.45. However, the Bases statement did not describe the extent to which the leakage detection systems are consistent with the RG. The design for the D. C. Cook Nuclear Plant (CNP) units was not required to meet the recommendations of RG 1.45. Since CNP is not required to meet the recommendations of RG 1.45 and is not committed to RG 1.45, the LER is being retracted.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET (2) NUMBER (2)	LER NUMBER (6)			PAGE (3)
Cook Nuclear Plant Unit 1	05000-315	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 2
		1999	010	01	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Description Of The Event

On May 3, 1999, Licensee Event Report (LER) 315/99-010-00 was issued to report a condition prohibited by Technical Specifications (T/S). The LER reported that, contrary to the description in T/S Bases 3/4.4.6.1, the design of the containment sump level and flow monitoring subsystem was not consistent with R.G. 1.45 and should be considered inoperable for the purposes of complying with TS 3.4.6.1. With one RCS leak detection subsystem inoperable, the action statement of T/S 3.4.6.1 would apply in Modes 1-4. However, since historically it was not recognized that the sump level and flow monitoring subsystem design was inoperable, the appropriate action statement may not have been entered, resulting in a condition prohibited by T/S.

Basis for Retraction

Subsequent investigation has determined that wording in the T/S Bases 3/4.4.6.1 was not clear and therefore, was subject to misinterpretation.

In September 1973, the NRC issued an SER in support of the operating licenses for both D. C. Cook Nuclear Plant (CNP) units. This SER established that the RCS leakage detection systems met the requirements of Atomic Energy Commission (AEC) proposed General Design Criteria (GDC) 16, "Monitoring Reactor Coolant Pressure Boundary," which required, in total, that "means shall be provided for monitoring the reactor coolant pressure boundary to detect leakage."

CNP was the first facility to apply NUREG-0452, Standard Technical Specifications - Westinghouse (STS). In March 1976, Amendment 12 to Facility Operating License DPR-58 for CNP Unit 1 incorporated the STS template as Appendix A to the license, including STS Bases statements. These same STS and Bases statements were subsequently used as a template for the December 1977 issue of Facility Operating License DPR-74 for CNP Unit 2. This SER acknowledged that changes to the T/Ss may be necessary that could not be envisioned before the specifications were in use. The SER discussion of changes in support of adopting of the NUREG-0452 STS was silent on the contents of the T/S Bases.

As part of the STS, T/S Bases section 3/4.4.6.1, included the following: "The RCS leakage detection systems required by this specification are provided to monitor and detect leakage from the Reactor Coolant Pressure Boundary. These detection systems are consistent with the recommendations of Regulatory Guide 1.45, 'Reactor Coolant Pressure Boundary Leakage Detection Systems, May 1973.'" This Bases statement does not describe the extent to which the leakage detection systems are "consistent with" Regulatory Guide (RG) 1.45 recommendations.

The design for the RCS leak detection systems does not meet, nor is it required to meet, all of the RG 1.45 recommendations. The RCS leak detection systems design is in compliance with the requirements of GDC 16 as approved by the NRC in September 1973 and are capable of performing their functions. The T/S Bases has been revised under the 10 CFR 50.59 process to remove any reference to RG 1.45.

The leak detection systems are in compliance with their design bases and capable of performing their functions. At all times leak detection systems of diverse and redundant capabilities were available to detect leakage, and as such, this issue is not reportable under the provisions of 10CFR50.73(a)(2)(i)(B). Therefore, LER 315/99-010-00 is retracted.