



November 1, 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 315/1999-023-01, "Retraction of LER 315/99-023-00".

All commitments made in LER 315/1999-023-00 are superceded. No new commitments have been identified in this LER.

Should you have any questions regarding this correspondence, please contact Mr. Wayne J. Kropp, Director Regulatory Affairs, at 616/697-5056.

Sincerely,

A handwritten signature in black ink that reads "Joseph E. Pollock". The signature is written in a cursive style with a large, looped initial "J".

Joseph E. Pollock
Plant Manager

/bwo
Attachment

c: J. E. Dyer, Region III
D. Hahn
B. A. McIntyre
T. P. Noonan
A. C. Bakken III
R. P. Powers
R. Whale
NRC Resident Inspector
Records Center, INPO

IE22

NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION (6-1998)	APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001 <small>Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If 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.</small>
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)	

FACILITY NAME (1) Donald C. Cook Nuclear Plant Unit 1	DOCKET NUMBER (2) 05000-315	PAGE (3) 1 OF 2
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TITLE (4)
 Retraction of LER 315/1999-023-00

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
09	07	1999	1999	023	01	11	01	2000	Cook Nuclear Plant Unit 2	05000-316
									FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
		20.2201(b)		20.2203(a)(2)(v)		50.73(a)(2)(i)		50.73(a)(2)(viii)		
POWER LEVEL (10)	00	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)			<input checked="" type="checkbox"/>	OTHER Retraction
		20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)				Specify in Abstract below or in NRC Form 386A
		20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)				

LICENSEE CONTACT FOR THIS LER (12)

NAME Rhonda Allen, Regulatory Compliance	TELEPHONE NUMBER (Include Area Code) 616/465-5901, x2027
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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	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).	<input checked="" type="checkbox"/> NO			

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

This supplement replaces the prior revision in its entirety.

On September 7, 1999, with both units defueled, it was concluded that surveillance testing for the Essential Service Water (ESW) system pump response time did not satisfy the Technical Specification (TS) definition for Engineered Safety Feature (ESF) response time. This conclusion was reached based on a footnote to UFSAR Table 7.2-7, "ESF Response Times", which appeared to require system response testing from signal initiation until a specific ESW pump discharge valve position or header pressure was reached. As no surveillance meeting this requirement existed, this condition was considered a missed surveillance and was reported in accordance with 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's TS.

Subsequent investigation has determined that the requirements for ESF response time testing of the ESW system are being adequately met by timing system response from actuation of the channel sensor until the pump breaker closes. In addition to the ESF response time testing performed every refueling outage, it was also verified that the stroke time testing of the ESW pump discharge valves is performed on a quarterly basis. As it has been determined that all ESF response time testing requirements of TS for the ESW system are being met, LER 315-99-023-00 is hereby retracted.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET (2) NUMBER (2)	LER NUMBER (6)			PAGE (3)
Donald C. Cook Nuclear Plant Unit 1	05000-315	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 of 2
		1999	023	01	

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

Description Of The Event

On October 7, 1999, Licensee Event Report (LER) 315/99-023-00 was issued to report a condition prohibited by Technical Specifications (TS). The LER reported that no testing could be identified which verified the capability of the Essential Service Water (ESW) pumps to meet the Engineered Safety Feature (ESF) response time specified in the Technical Specifications (TS) or the Updated Safety Analysis Report (UFSAR).

An investigation of this condition, completed September 1, 1999, confirmed that the acceptance criteria for TS surveillance testing defined the ESF response time for the ESW pumps as the elapsed time from actuation of the channel sensor until pump breaker closure. Testing did not include the time until a specific pump discharge pressure was reached or the ESW pump discharge valve reached a specific position, using TS definition 1.23 generically as stated by the first footnote to UFSAR Table 7.2-7, ESF Response Times.

Since the existing surveillance testing did not satisfy the UFSAR information as it applied to the generic TS definition of ESF response time, it was concluded that the identified condition constituted a missed surveillance test, and LER 315-99-023-00 was submitted.

Basis for Retraction

Subsequent investigation has determined that the response time requirements of the TS have been met in the past for the ESW system actuation by timing from actuation of the channel sensor to pump breaker closure.

Confusion regarding the testing requirements arose from the 1997 UFSAR revision. This revision was improperly amended and introduced erroneous wording that resulted in an alternate interpretation of the surveillance test requirement for ESW.

The 1996 UFSAR update had incorporated ESF response time requirements into UFSAR Table 7.2-7, "Engineered Safety Features Response Times", which were removed from the TS in accordance with Generic Letter GL 93-08. The UFSAR table was initially created without the footnotes that had existed when the table was in TS. In 1997 the footnotes were added to the UFSAR table, however, in an amended form. The TS table footnotes originally stated, in part, "Response time limit includes opening of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps." In the 1997 UFSAR update this portion of the footnote was removed and a general note stating the TS definition of ESF response time was inappropriately used instead.

The initial investigation of this event relied upon the existing UFSAR language to conclude time response testing from actuation of the sensor to the required discharge valve position or discharge pressure was reached, and that the required surveillances had not been performed. This is considered to be a failure to conduct an adequate investigation for the condition initially reported in this LER. The subsequent discovery of the deficient investigation has been documented in a Condition Report and will be processed in accordance with the plant's Corrective Action Program.

An UFSAR change request has been submitted and approved to revise the footnotes for Table 7.2-7, removing the generic definition of TS ESF response time, and replacing the sentence that was erroneously deleted when the footnotes were incorporated in 1997. This specific time response information correctly encompasses the time response of ESW necessary for satisfying Accident Analysis requirements. In addition to the ESF response time testing performed every refueling outage, it was also verified that the stroke time testing of the ESW pump discharge valves is performed on a quarterly basis.

As it has been determined that all ESF response time testing requirements of TS for the ESW system are being met, LER 315-99-023-00 is hereby retracted.