



November 16, 2000

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

Operating License DPR-74
Docket No. 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 316/2000-015-00, "Containment Airlock Door Seals Not Tested At Frequency Required By Technical Specifications."

The following commitments are identified in this submittal:

- Procedure PMP-4030.EIS.001, "Event-Initiated Surveillance Testing," will be revised by December 15, 2000, to include a trigger to perform the airlock door seal surveillance test within seven days following a containment entry.
- The root cause and corrective/preventive actions will be provided in a supplement to this LER when the investigation has been completed.

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'.

Joseph E. Pollock
Plant Manager

/srd
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

LICENSEE EVENT REPORT (LER)

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

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-8 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

FACILITY NAME (1) Donald C. Cook Nuclear Plant Unit 2	DOCKET NUMBER (2) 05000-316	PAGE (3) 1 of 3
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TITLE (4)
Containment Airlock Door Seals Not Tested At Frequency Required By Technical Specifications

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	
10	19	2000	2000	-- 015 --	00	11	16	2000	FACILITY NAME	DOCKET NUMBER	
OPERATING MODE (9)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)										
1	20.2201 (b)			20.2203(a)(2)(v)			<input checked="" type="checkbox"/> 50.73(a)(2)(i)		50.73(a)(2)(viii)		
POWER LEVEL (10)	100										
	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)		OTHER		
	20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A		
	20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)				

LICENSEE CONTACT FOR THIS LER (12)

NAME R. W. Gaston, Regulatory Affairs	TELEPHONE NUMBER (Include Area Code) 616 / 465-5901, x1366
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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 DATE (15)		
<input checked="" type="checkbox"/> YES (If Yes, complete EXPECTED SUBMISSION DATE).	NO					

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

On October 19, 2000, during evaluation of a field observation from the Performance Assurance department, it was determined that Technical Specifications (TS) surveillance requirement 4.6.1.3.a to test the containment airlock door seals within seven days following airlock entry was not performed. On July 27, 2000, at 0315 hours, an operator entered the Unit 2 containment 612 foot (ft) elevation airlock to perform a surveillance test line-up. The airlock was not entered again until August 10, 2000, at 0200 hours. No testing of the 612 ft airlock door seals occurred during that period. Failure to test the containment airlock door seals within seven days following the entry was determined to be a violation of TS. This LER is submitted in accordance with 10 CFR 50.73(a)(2)(i)(B), for a condition prohibited by the plant's TS.

The root cause investigation for this event is in progress. The root cause and corrective/preventive actions will be provided in a supplement to this LER when the investigation has been completed. A review of the containment entry log since Unit 2 restart in June 2000 was performed to ensure no other cases of missed airlock door seal surveillance tests have occurred. Procedure PMP-4030.EIS.001, "Event-Initiated Surveillance Testing," will be revised by December 15, 2000, to include a trigger to perform the airlock door seal surveillance test within seven days following a containment entry. As an interim action, the frequency of testing containment airlock door seals has been changed from 30 days to seven days.

Based on a successful history of airlock door seal surveillance leak testing prior to and following the event, there is no safety significance to this condition.

**LICENSEE EVENT REPORT (LER)
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TEXT (If more space is required, use additional copies of NRC Form (366A) (17))

Conditions Prior to Event

Unit 2 was in Mode 1, Power Operation, at 100 percent rated thermal power.

Description of Event

On October 19, 2000, during evaluation of a field observation from the Performance Assurance department, it was determined that Technical Specifications (TS) surveillance requirement 4.6.1.3.a to test the containment airlock door seals within seven days following airlock entry was not performed. On July 27, 2000, at 0315 hours, an operator entered the Unit 2 containment 612 foot (ft) elevation airlock to perform a surveillance test line-up. The airlock was not entered again until August 10, 2000, at 0200 hours. No testing of the 612 ft airlock door seals occurred during that period. Failure to test the containment airlock door seals within seven days following the entry was determined to be a violation of TS. This LER is submitted in accordance with 10 CFR 50.73(a)(2)(i)(B), for a condition prohibited by the plant's TS.

Cause of Event

The root cause investigation for this event is in progress. The results of the investigation will be provided in a supplement to this LER.

Analysis of Event

Testing of the containment airlocks is required to verify that containment integrity is maintained in the event of design basis accidents. Donald C. Cook Nuclear Plant (CNP) TS surveillance requirement 4.6.1.3.a states that each containment airlock shall be demonstrated operable in accordance with 10CFR50 Appendix J, Option B, and Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program." Regulatory Guide 1.163 states that licensees should establish test intervals based upon the criteria in NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J." Section 10.2.2.1, "Containment Airlocks - Test Interval," of NEI 94-01 states that airlock door seals should be tested within seven days after each containment access. Section 10.2.2.1 further states that, for periods of multiple containment entries where the air lock doors are routinely used for access more frequently than once every seven days (e.g., shift or daily inspection tours of the containment), door seals may be tested once per 30 days during this time period.

The data for the 30-day surveillance procedure 12 EHP 4030.046.204, "Unit 2 Personnel Airlock Leak Rate Surveillance," performed prior to and following the event, showed that, with one exception, the measured leakage for seal testing of the containment air lock doors has been well within the acceptance criteria limits. On October 4, 2000, the outer door seal for the 612 ft airlock had a dirty seal, and seal leakage exceeded the procedural leakage limit of 200 standard cubic centimeters per minute. The inner seal passed satisfactorily. The outer seal was cleaned and the leakage restored to within limits. Based on the successful surveillance leak-test history, containment integrity was not compromised during the period when the 612 ft airlock was not tested in accordance with TS and NEI 94-01, and the condition was of no safety significance.

Corrective Actions

No immediate corrective actions were required because the results of the 30-day surveillance tests performed since the event occurred in August 2000, have been satisfactory, with the one exception noted in the Analysis, above.

A review of the containment entry log since Unit 2 restart in June 2000 has been performed to ensure no other cases of missed airlock door seal surveillance tests have occurred.

Procedure PMP-4030.EIS.001, "Event-Initiated Surveillance Testing," will be revised by December 15, 2000, to include a trigger to perform the airlock door seal surveillance test within seven days following a containment entry.

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

As an interim action, the frequency of testing containment airlock door seals has been changed from 30 days to seven days. This frequency change will ensure that the airlock door seal TS requirements are met.

Corrective and preventive actions for this event have not been determined because the root cause investigation is still in progress. The root cause and corrective/preventive actions will be provided in a supplement to this LER when the investigation has been completed.

Previous Similar Events

The corrective actions from LER 50-315/1998-043-00, "Containment Air Locks Testing Not Performed In Accordance With Technical Specification 4.6.1.3.a," should have prevented the event described in this LER.

Containment airlock testing has been performed on a 30-day frequency since the restart of Unit 2 in June 2000. The 30-day frequency was selected following the investigation supporting LER 50-315/1998-043-00, "Containment Air Locks Testing Not Performed In Accordance With Technical Specification 4.6.1.3.a.," relying on the fact that the seven-day test interval in NEI 94-01, Section 10.2.2.1, is preceded by the word 'should.' Use of the word 'should' in the NEI 94-01 document was not considered a requirement, but rather, a recommendation. The 30-day frequency for performance of the airlock door seal surveillance testing was considered acceptable based on a successful test performance history. However, it has since been determined that, applying literal compliance guidelines, the NEI 94-01 airlock door seven-day test interval following containment access is a requirement, not merely a recommendation.