

Indiana Michigan
Power Company
500 Circle Drive
Buchanan, MI 49107 1395



August 17, 2001

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 316/2001-015-01: "Containment Airlock Door Seals Not Tested At Frequency Required By Technical Specifications".

This supplemental LER is being issued to provide the cause and corrective actions associated with this event and replaces the original LER in its entirety. No commitments are identified in this submittal.

Should you have any questions regarding this correspondence, please contact Mr. Ronald W. Gaston, Manager, Regulatory Affairs, at 616/465-5901, extension 1366.

Sincerely,

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

Joseph E. Pollock
Plant Manager

/pe

Attachment

c: J. E. Dyer, Region III
A. C. Bakken
L. Brandon
T. P. Noonan
R. P. Powers
M. W. Rencheck
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-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

FACILITY NAME (1) Donald C. Cook Nuclear Plant Unit 2		DOCKET NUMBER (2) 05000-316	PAGE (3) 1 of 3
--	--	--------------------------------	--------------------

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 --	01	8	17	2001	FACILITY NAME	DOCKET NUMBER	
OPERATING MODE (9)		1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
POWER LEVEL (10)		100	20.2201 (b)			20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	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)	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 J. L. Mathis, Regulatory Affairs	TELEPHONE NUMBER (Include Area Code) 616 / 465-5901, x1578
--	---

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)		MONTH	DAY	YEAR
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 is being issued to provide the cause and corrective actions associated with this event and replaces the original LER in its entirety.

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 elevation 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 cause of this event was misinterpretation of the requirements in Section 10.2.2.1 of NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," by plant personnel during the development and review of plant test procedures. A contributing cause was the over reliance on a single individuals expert opinion during the review and approval process. 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. Plant procedures have been revised to meet the requirements of NEI-94-01

Based on the successful surveillance leak-test history, containment integrity was not compromised during the period when the 612 ft elevation airlock was not tested in accordance with TS and NEI 94-01, and the condition was of no safety significance.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

FACILITY NAME (1)	DOCKET NUMBER(2)	LER NUMBER (6)					PAGE (3)
		YEAR	SEQUENTIAL NUMBER		REVISION NUMBER		
		2000	--	015	--	01	

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 elevation 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 cause of this event was determined to be a misinterpretation of the requirements specified in Section 10.2.2.1 of NEI 94-01, "Industry Guideline for Implementing Performance-Based Option B of 10 CFR Part 50, Appendix J," by plant personnel during the development and review of plant test procedures. A contributing cause was the over reliance on a single individuals expert opinion during the procedure review and approval process. This discrepant condition relates to implementation of Option B for 10 CFR 50 Appendix J and the extent of condition was limited to Engineering Programs.

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 10 CFR 50 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, which states that airlock door seals should be tested within seven days after each containment access. Section 10.2.2.1 of NEI 94-01 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 the measured leakage for seal testing of the containment air lock doors has been well within the acceptance criteria limits. Based on the successful surveillance leak-test history, containment integrity was not compromised during the period when the 612 ft elevation airlock was not tested in accordance with TS and NEI 94-01, and the condition was of no safety significance.

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.

Corrective Actions

Plant procedures have been revised to meet the requirements of NEI 94-01.

Qualification requirements were upgraded for procedure technical reviewers and the appropriate individuals have been trained to ensure backup and peer-review personnel are adequately qualified. This event was reviewed with Engineering Programs personnel to stress the importance of independent reviews.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER(2)	LER NUMBER (6)				PAGE (3)
		YEAR	SEQUENTIAL NUMBER		REVISION NUMBER	
		2000	--	015	--	
Donald C. Cook Nuclear Plant Unit 2	05000-316					3 of 3

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

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, the NEI 94-01 airlock door seven-day test interval following containment access is a requirement, not merely a recommendation.