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November 21, 2001

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

Operating License DPR-58
Docket No. 50-315

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 315/2001-004-00: "Unit 1 Entered Mode 3 With Remote Shutdown Panel Pressurizer Level Instrument Channel Inoperable"

No new commitments were identified in this submittal.

Should you have any questions regarding this correspondence, please contact Mr. Ronald W. Gaston, Manager, Regulatory Affairs, at 616/697-5020.

Sincerely,

Joseph E. Pollock
Plant Manager

INJ/pae

Attachment

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NRC Form 366 (7-2001) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104 EXPIRES 7-31-2004

Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjs1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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.

LICENSEE EVENT REPORT (LER)

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

1. FACILITY NAME	2. DOCKET NUMBER	3. PAGE
Donald C. Cook Nuclear Plant Unit 1	05000-315	1 of 3

4. TITLE

Unit 1 Entered Mode 3 With Remote Shutdown Panel Pressurizer Level Instrument Channel Inoperable

5. EVENT DATE			6. LER NUMBER				7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER		REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
09	27	2001	2001	--	004	-- 00	11	21	2001	FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE	4
10. POWER LEVEL	0

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)

20.2201(b)		20.2203(a)(3)(ii)	50.73(a)(2)(ii)(B)	50.73(a)(2)(ix)(A)
20.2201(d)		20.2203(a)(4)	50.73(a)(2)(iii)	50.73(a)(2)(x)
20.2203(a)(1)		50.36(c)(1)(i)(A)	50.73(a)(2)(iv)(A)	73.71(a)(4)
20.2203(a)(2)(i)		50.36(c)(1)(ii)(A)	50.73(a)(2)(v)(A)	73.71(a)(5)
20.2203(a)(2)(ii)		50.36(c)(2)	50.73(a)(2)(v)(B)	OTHER Specify in Abstract below or in NRC Form 366A
20.2203(a)(2)(iii)		50.46(a)(3)(ii)	50.73(a)(2)(v)(C)	
20.2203(a)(2)(iv)		50.73(a)(2)(i)(A)	50.73(a)(2)(v)(D)	
20.2203(a)(2)(v)	X	50.73(a)(2)(i)(B)	50.73(a)(2)(vii)	
20.2203(a)(2)(vi)		50.73(a)(2)(i)(C)	50.73(a)(2)(viii)(A)	
20.2203(a)(3)(i)		50.73(a)(2)(ii)(A)	50.73(a)(2)(viii)(B)	

12. LICENSEE CONTACT FOR THIS LER

NAME	TELEPHONE NUMBER (Include Area Code)
I.N.Jackiw, Regulatory Affairs	616-465-5901 x1602

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX
B	AB	CPLG	Swagelock	N					

14. SUPPLEMENTAL REPORT EXPECTED			15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
	YES (If Yes, complete EXPECTED SUBMISSION DATE).	X NO				

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

On September 27, 2001, during Unit 1 startup activities, the unit was taken from Mode 4 to Mode 3 with the remote shutdown pressurizer level instrument inoperable. The inoperable instrument was identified in Mode 4, during performance of normal control room panel walkdowns. Despite this discovery, the unit was taken to Mode 3 in violation of Technical Specification (TS) 3.0.4. . During the extent of condition review for this event, it was identified that during Unit 1 startup activities on December 12, 2000, the required monthly channel check had not been performed for the pressurizer pressure instrumentation prior to transition to Mode 3. This condition was also determined to be a violation of TS 3.0.4. Both events were determined to be reportable per 10CFR50.73(a)(2)(i)(B) as conditions that are prohibited by TS.

The cause of the September 2001 violation was human error. Corrective actions included counseling of the responsible personnel and distribution of lessons learned. The cause for the December 2000 event was incorrect procedure guidance. Corrective actions included the establishment of a Unit 1 Mode 3 constraint as a barrier to prevent additional violations while a change to the TS is processed that will permit the remote shutdown instrumentation (TS 3.3.5.5) to be excepted from TS 3.0.4. The significance of the TS violations is considered minimal since the probability of an event requiring the Remote Shutdown System is low, and because the equipment can generally be repaired during operation without significant risk of spurious trip.

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

Conditions Prior to Event
Unit 1, Mode 4, Hot Shutdown

Description of Event

On September 27, 2001, during Unit 1 startup activities, the unit was taken from Mode 4 to Mode 3 with the remote shutdown pressurizer (EIIS:AB) level instrument inoperable. The inoperable instrument was identified in Mode 4, during performance of normal control room panel walkdowns, when shift personnel found that pressurizer level instrument, 1-NLP-151, that also provides readout display on the Remote Shutdown Panel, was indicating a difference of 7 percent compared to level instruments 1-NLP-152 and 1-NLP-153. This exceeded the acceptance limit of 4 percent contained in procedure 01-OHP-4030-STP-030, "Daily and Shiftly Surveillance Checks," and the instrument was declared inoperable. Despite this discovery, the unit entered Mode 3 with an inoperable remote shutdown instrument channel contrary to Technical Specification (TS) 3.0.4. This LER is being submitted in accordance with 10 CFR 50.73(a)(2)(i)(B) for an operation or condition, which is prohibited by plant Technical Specifications.

Unit 1 TS 3.3.3.5, "Remote Shutdown Instrumentation," requires that the remote shutdown instrumentation channels listed in TS Table 3.3-9 to be operable with readouts displayed external to the control room in Modes 1 through 3. The actions for TS 3.3.3.5 state that, "With the number of OPERABLE remote shutdown monitoring channels less than required by Table 3.3-9, either: a) Restore the inoperable channel to OPERABLE status within 30 days, or b) Be in HOT SHUTDOWN within the next 12 hours." In addition, TS 3.0.4 requires that entry into an operational mode or other specified applicability condition shall not be made unless the conditions of the limiting condition for operation are met without reliance on provisions contained in the action statements unless otherwise excepted. Because Unit 1 entered Mode 3 with 1-NLP-151 inoperable, the TS 3.3.3.5 Limiting Conditions for Operation was not met and thus is a violation of TS 3.0.4.

During the extent of condition review for this event, it was also identified that the surveillance requirement to perform a monthly channel check for the remote shutdown pressurizer pressure instrument channel could not be performed prior to Unit 1 entering Mode 3. Because the pressurizer pressure instrument has a range of 1,700 pounds per square inch gauge (psig) to 2,500 psig, the channel check must be performed at a pressurizer pressure of at least 1,700 psig. However, Mode 4 operation at a pressure at or above 1,700 psig is prohibited by the current operational limitations on primary-to-secondary steam generator tube differential pressure. In addition, it was noted that Unit 2 TS 3.3.3.5 includes a statement that the provisions of TS 3.0.4 are not applicable. It was identified that during Unit 1 startup activities on December 12, 2000, the required monthly channel check had not been performed for the pressurizer pressure instrument prior to the mode transition. This condition was also determined to be reportable in accordance with 10 CFR 50.73(a)(2)(i)(B).

Cause of Event

The apparent cause for the September 2001 event was human error. When the pressurizer level instrument was declared inoperable, operations personnel improperly focused on operability requirements for the reactor protection instrumentation specification TS 3.3.1.1, instead of the remote shutdown instrumentation specification TS 3.3.3.5. Instrument specification TS 3.3.1.1 is only applicable in Modes 1 and 2.

A leaking Swagelock connection (EIIS:CPLG) was found to be the cause of the pressurizer level instrument inoperability.

Regarding the December 2000 event for failure to perform the required monthly channel check of the remote shutdown pressurizer pressure instrumentation prior to entering Mode 3, the cause was incorrect procedure guidance. Procedure 01-OHP-4030.STP.031, "Operation Weekly Surveillance Checks," incorrectly stated that the Hot Shutdown Panel channel check for pressurizer pressure instrument 1-NPP-151 was not applicable in Mode 3.

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

Analysis of Event

The Remote Shutdown System provides the control room operator with sufficient instrumentation and controls to place and maintain the plant in a safe shutdown condition from a location other than the control room. This capability is necessary to protect against the possibility that the control room becomes inaccessible. If the control room becomes inaccessible, the operators can establish control at the Hot Shutdown Panel, and place and maintain the plant in Mode 3.

Performance of scheduled channel checks ensures that a gross failure of the Remote Shutdown System instrumentation has not occurred. A channel check is the quantitative assessment of channel behavior during operation by observation. This determination includes, where possible, comparison of the channel and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

TS 3.0.4 requires that entry into an operational mode or other specified applicability condition shall not be made unless the conditions of the limiting condition for operation are met without reliance on provisions contained in the action statements unless otherwise excepted. The Applicability section of the TS Bases for TS 3.0.4 describes that the intent of this provision is to insure that facility operation is not initiated with either required equipment or systems inoperable or other specified limits being exceeded. This section further states that exceptions to this provision have been provided for a limited number of specifications when startup with inoperable equipment would not affect plant safety. This exception is stated in the action statements of the appropriate specifications. This exception is not presently applicable for the Unit 1 TS 3.3.3.5. However since the exception has been approved for the corresponding Unit 2 TS it should be appropriate for application to the Unit 1 TS.
The significance of the TS violations is considered minimal since the probability of an event requiring the Remote Shutdown System is low, and because the equipment can generally be repaired during operation without significant risk of spurious trip.

Corrective Actions

The leaking Swagelock fitting on Unit 1, that caused the level deviation on the remote shutdown pressurizer level instrument, was tightened, successfully tested and returned to service. The Unit 2 pressurizer level instrumentation was also inspected and no indicated level deviations were identified.

The involved individuals have been counseled and a lessons learned memorandum has been issued to appropriate personnel. The personnel performance aspects of this event are being addressed in accordance with plant practices and procedures and will be tracked as part of Donald C. Cook Nuclear Plant's corrective action process.

A proposed amendment to the Unit 1 TS 3.3.3.5 has been submitted to include an exception for the remote shutdown instrumentation from the provisions of TS 3.0.4. Specifically, the amendment proposes to revise the action statements for TS 3.3.3.5 to add a statement that the provisions of TS 3.0.4 are not applicable in Modes 1 through 3. The proposed change is being requested to allow entry into Mode 3 under the provisions of the action statements for TS 3.3.3.5. In the interim, a Unit 1 Mode 3 constraint has been generated in lieu of a procedure revision and will prevent additional violations until the TS change is approved. This TS change will make the action requirements consistent between Units 1 and 2 and will prevent recurrence of similar events involving the remote shutdown instrumentation.

Previous Similar Events

None