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March 15, 2002

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

Operating Licenses DPR-74
Docket Nos. 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 316/2002-004-00: "Unanticipated Start of the Turbine Drive Auxiliary Feedwater Pump"

The following commitment was identified in this submittal:

- Procedures 01 (02) -OHP-4021-001-003 will be revised to include a statement in an appropriate form prior to the steps to initiate the manual trip from less than 22% that it is expected that the TDAFP will auto start.

Should you have any questions regarding this correspondence, please contact Mr. Gordon P. Arent, Manager, Regulatory Affairs, at 616/697-5553.

Sincerely,

A handwritten signature in cursive script that reads "Joe Pollock Sr".

Joseph E. Pollock
Site Vice President

RM/pae

Attachment

IE 22

c: G. P. Arent
A. C. Bakken
L. Brandon
K. D. Curry
J. E. Dyer, Region III
R. W. Gaston
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NRC Resident Inspector
Records Center, INPO

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 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.

1. FACILITY NAME Donald C. Cook Nuclear Plant Unit 2	2. DOCKET NUMBER 05000-316	3. PAGE 1 of 3
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4. TITLE
Unanticipated Start of the Turbine Drive Auxiliary Feedwater Pump

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	
01	19	2002	2002	-- 004 --	00	03	15	2002	FACILITY NAME	DOCKET NUMBER	

9. OPERATING MODE	5	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)								
10. POWER LEVEL	00	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)	X 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)	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 Richard A. Meister, Regulatory Affairs	TELEPHONE NUMBER (Include Area Code) (616) 465-5901, X1707
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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

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

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

At 00:01 hours on 01/19/02, in preparation for a Unit 2 refueling outage, Operations shift personnel initiated a planned manual reactor trip of Unit 2 from 22% power per procedure 02-OHP-4021-001-003, Revision 15, "Power Reduction." Shortly thereafter, an automatic start of the turbine driven auxiliary feedwater pump (TDAFP) occurred as a result of a valid low level indication in the steam generators. Due to a lack of written procedural guidance in the "Power Reduction" procedure, the automatic start of the TDAFP was determined to be an "unanticipated" engineered safety feature (ESF) actuation.

Steam generator levels rapidly recovered. Operators secured the TDAFP and throttled the flows from the motor driven auxiliary feedwater pumps in accordance with plant procedures for reactor trip response and recovery. Reactor coolant system cooldown and depressurization proceeded normally. During the trip, pressurizer level shrank lower than procedurally anticipated, resulting in a reactor coolant system letdown isolation.

At 07:56 on 01/19/02, the Shift Manager made an eight hour, non-emergency notification to the NRC (EN# 38640) per 10CFR50.72(b)(3)(iv)(A) for an unanticipated ESF actuation. The cause of this event was inadequate procedural guidance. Corrective actions will include revision of the applicable shutdown procedure to ensure operators are alerted to the potential for an automatic start of the TDAFP.

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

1. FACILITY NAME	2. DOCKET NUMBER	6. LER NUMBER				3. PAGE
		YEAR	SEQUENTIAL NUMBER		REVISION NUMBER	
		2002	--	004	--	

Donald C. Cook Nuclear Plant Unit 2

05000-316

2 of 3

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

Conditions Prior to Event

Unit 1 - 100 percent power
Unit 2 - 22 percent power

Description of Event

At 00:01 hours on 01/19/02, in preparation for a Unit 2 refueling outage, Operations shift personnel initiated a planned manual reactor trip of Unit 2 from 22% power per procedure 02-OHP-4021-001-003, Revision 15, "Power Reduction." Shortly thereafter, an automatic start of the turbine driven auxiliary feedwater pump (TDAFP) occurred as a result of valid low level indication in the Steam Generators. Prior to commencing the unit shutdown, a "pre-job" brief was held with the operating crew. During the pre-job briefing, it was discussed that the TDAFP may start (an expected condition). Due to a lack of written procedural guidance in the "power reduction" procedure, the automatic start of the TDAFP was later determined to be an "unanticipated" engineered safety feature (ESF) Actuation, in accordance with the guidance contained in NUREG-1022, Revision 2, Paragraph 3.2.6.

Steam Generator levels rapidly recovered. Operators secured the TDAFP and throttled flows from the motor driven auxiliary feedwater pumps in accordance with plant procedures for reactor trip response and recovery. Reactor Coolant System (RCS) cooldown and depressurization proceeded normally. During the trip, pressurizer level shrank lower than procedurally anticipated, resulting in a reactor coolant system letdown isolation. The operating crew recovered from the letdown isolation in accordance with approved plant procedures.

At 07:56 on 01/19/02, the Shift Manager made an eight hour, non-emergency notification to the NRC (EN# 38640) in accordance with 10CFR50.72 (b) (3) (iv) (A) for an unanticipated ESF actuation.

Cause of Event

Procedure 02-OHP-4021-001-003 did not clearly state that an automatic start of the TDAFP was anticipated. Prior to the conduct of the unit shutdown, a pre-job briefing was held with the operating crew. During this pre-job briefing it was discussed that the TDAFP may start (an expected condition). The procedure should have included a notification about the TDAFP in the procedure prior to the steps to initiate the manual trip from less than 22%. Such notification should have indicated that a significant drop in Steam Generator water level was expected as a result of the reactor trip and that the TDAFP may auto-start. This would have fully documented that such a TDAFP auto-start was expected and preplanned, and thus would not be reportable if it occurred.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

1. FACILITY NAME	2. DOCKET NUMBER	6. LER NUMBER				3. PAGE
		YEAR	SEQUENTIAL NUMBER		REVISION NUMBER	
		2002	--	004	--	
Donald C. Cook Nuclear Plant Unit 2	05000-316					3 of 3

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

Analysis of Event

Although the automatic start of the TDAFP was not specifically called out as an expected occurrence after manual reactor trip from 20% power in procedure 02-OHP-4021-001-003, the drop in steam generator narrow range level instrumentation to less than 21% and the subsequent automatic start of the TDAFP were reasonably expectable occurrences following a reactor trip. The system performed as designed. Prior to the conduct of the unit shutdown a pre-job briefing was held with the operating crew. During this pre-job briefing it was discussed that the TDAFP may start (an expected condition). Aside from procedural recognition that the TDAFP may automatically start, no changes need to be made to the procedure to prevent this ESF actuation. Accordingly, there were no actual nuclear, radiological, or industrial safety consequences because of this event.

Corrective Action

Procedures 01(02)-OHP-4021-001-003 will be revised to include a statement in an appropriate form prior to the steps to initiate the manual trip from less than 22% that it is expected that the TDAFP may auto start.

Previous Similar Events

None.