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March 15, 2002

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

Operating Licenses DPR-58
Docket Nos. 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 315/2002-001-00: "Containment Isolation Valve Alignment Error during LLRT"

The following commitment was identified in this submittal.:

- Further Procedure 12/MHP-4030-010-003 will be revised prior to testing of the Unit 1 lower ice condenser inlet doors.

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

Sincerely,

Joseph E. Pollock
Site Vice President

JM/pae

Attachment

IE22

c: G. P. Arent
A. C. Bakken
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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
Cook Nuclear Plant Unit 1	05000-315	1 of 3

4. TITLE

Failure To Perform Ice Condenser Door Testing In Accordance With Technical Specifications

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	25	2002	2002	--	001	-- 00	03	15	2002	FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE		11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)								
10. POWER LEVEL			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)
Richard Meister – Senior Specialist	616-465-5901-1707

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	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 January 31, 2001, as a result of questions from the NRC resident inspection team, it was determined that the surveillance requirements verifying the opening, closing, and frictional torque of the ice condenser inlet doors within the specified limits required by Unit 1 Technical Specifications 4.6.5.3.1.b.3, 4.6.5.3.1.b.4, and 4.6.5.3.1.b.5 were not met.

All of the ice condenser doors were refurbished during the extended outage and recent re-testing of the Unit 2 ice condenser doors adequately demonstrated that the ice condenser lower inlet doors are operable. The recent refurbishment of all ice condenser inlet doors for both units when coupled with the successful re-testing of the Unit 2 ice condenser inlet doors provided reasonable assurance that although not re-tested that the Unit 1 ice condenser doors would perform their safety function. Therefore, it has been determined that the failure to correctly test the ice condenser inlet doors for both units had minimal safety significance.

The cause of the inadequate testing has been determined to be inadequate testing methodology and inadequate training of testing personnel. Corrective actions included re-testing of the Unit 2 ice condenser doors, revision of the applicable testing procedures, and enhanced training of testing personnel. Additionally, an Emergency License Amendment was issued providing a one time exception to the testing requirements specified in Unit 1 Technical Specifications 4.6.5.3.1.b.3, 4.6.5.3.1.b.4, and 4.6.5.3.1.b.5.

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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 - MODE 6

Description of Event

On January 31, 2002, as a result of questions from the NRC resident inspection team, it was determined that the surveillance requirements verifying the opening, closing, and frictional torque of the ice condenser lower inlet doors were not met. This is a violation of Unit 1 Technical Specifications 4.6.5.3.1.b.3, 4.6.5.3.1.b.4, and 4.6.5.3.1.b.5. Specifically, the past tests failed to consistently achieve a 40 degree open door position and did not consistently achieve a constant scale position on the door in relationship to the door hinge. The previous test methodology resulted in small angular variations (up to 5 degrees) in the door position for each door. The position of the spring scale when measured from the center of the hinge varied from 27 inches to approximately 24.5 inches. Both of these test variations will affect the torque values derived for each door.

The previous opening torque test method and sequence, failed to provide an accurate measure of opening force/torque. Because the frictional torque is determined by dividing the difference between opening and closing torque by two, the frictional torque data was also not considered to be valid. Although, the previous tests did not adequately evaluate the closing force/torque against the technical specification criteria, and did not provide an accurate measurement of door opening torque and frictional torque, the data from the tests performed can still be used to draw conclusions about the condition of the doors, and their ability to function to mitigate design basis accidents.

The conclusions that the ice condenser lower inlet door opening force was invalid resulted in declaring the Unit 1 ice condenser lower inlet doors inoperable on January 31, 2002 at 1358 hours. On January 31, 2002, this condition was determined to be reportable in accordance with 10 CFR 50.73(a)(2)(I)(B).

Cause of Event

The cause of the event has been determined to be inadequate testing methodology and inadequate training (i.e., lack of hands-on training) of testing personnel on the proper performance testing and usage of test equipment.

Analysis of Event

Both the Unit 1 and the Unit 2 ice condenser systems including the lower inlet doors were subjected to similar refurbishment prior to the current operating cycle. During the current operating cycle both the ice condenser and containment systems have been subjected to similar maintenance and operational activities. The lower inlet doors were previously tested using an invalid test methodology. Subsequently, the Unit 2 doors were retested and OPERABILITY of the doors was fully demonstrated. Based upon the corollaries drawn, had the Unit 1 lower inlet doors been tested with a valid test methodology, the results would have demonstrated compliance with the technical specification criteria. As such, the Unit 1 ice condenser lower inlet doors are fully capable of performing their design basis function and should be considered to be operable. This event would not have adversely impacted the plant's ability to mitigate the consequences of an accident and therefore had minimal safety significance.

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

Corrective Actions

- To address the identified deficiencies a special testing procedure to validate operability of the Unit 2 ice condenser inlet doors was developed and implemented.

- Procedure 12/MHP-4030.010.003, lower inlet door surveillance was subsequently revised and implemented using personnel trained to the revised testing requirements to demonstrate compliance with the technical specifications for Unit 2. Further Procedure 12/MHP-4030.010.003 will be revised prior to testing of the Unit 1 lower ice condenser inlet doors.

- The submittal and receipt of a Limited License Amendment 265 for Unit 1 ice condenser inlet door testing requirements allows continued operation of Unit 1 until the next refueling outage or plant entry into MODE 5 (of sufficient duration). Testing will be completed as specified in this license amendment in accordance approved plant procedure by qualified testing personnel.

Previous Similar Events

There were 13 LERs included in the D. C. Cook Restart Action Matrix Item # 6 for resolution of ice condenser issues. However, none of the identified issues involved testing to satisfy the technical specifications associated with frictional torque requirements.

LER 315/1998-004
LER 315/1998-005
LER 315/1998-006
LER 315/1998-007
LER 315/1998-008
LER 315/1998-010
LER 315/1998-015
LER 315/1998-017
LER 315/1998-024
LER 315/1998-025
LER 315/1998-026
LER 315/1998-032
LER 315/1998-035