



Nebraska Public Power District
Nebraska's Energy Leader


NLS2002127
November 15, 2002

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Subject: Licensee Event Report No. 2002-001
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

The subject Licensee Event Report is forwarded as an enclosure to this letter.

Sincerely,



J. A. Hutton
Plant Manager

/rar
Enclosure

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

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IE 22

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4. TITLE
Loss of High Pressure Coolant Injection Safety Function Due to Gland Seal Condenser High Level Annunciation

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
09	18	2002	2002	- 001 -	00	11	15	2002	FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE	1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check all that apply)									
10. POWER LEVEL	100	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)			X 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 Paul Fleming, Licensing Manager	TELEPHONE NUMBER (Include Area Code) 402-825-2774

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT									
CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED				15. EXPECTED SUBMISSION DATE		
X	YES (If yes, complete EXPECTED SUBMISSION DATE)	NO		MONTH	DAY	YEAR
				02	18	03

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

On September 18, 2002, at 1425 Central Daylight Time (CDT), with Cooper Nuclear Station (CNS) in Mode 1, Power Operation, at approximately 100 percent power (steady state), the Control Room received annunciator, "High Pressure Coolant Injection (HPCI) Gland Seal Condenser Hotwell High Level". In accordance with the alarm response procedure, the HPCI Auxiliary Oil Pump switch was placed in the Pull-to-Lock (PTL) position at 1428 CDT. The HPCI system was declared inoperable per Technical Specification

This event was initiated by the failure of a non-essential Gland Seal Condenser level switch. Upon completion of replacement of the level switch and post work testing of the system, HPCI was restored to operable status at 1339 CDT on September 20, 2002.

CNS is currently investigating if the alarm response procedure step to place the Auxiliary Oil Pump switch in the PTL position is necessary.

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

PLANT STATUS

Cooper Nuclear Station (CNS) was in Mode 1, Power Operation, at approximately 100 percent power (steady state) at the time of the identified condition.

BACKGROUND

The High Pressure Coolant Injection (HPCI) System [EIS:BJ] is provided to assure that the reactor is adequately cooled to limit fuel clad temperature in the event of a small break in the nuclear system and loss of coolant which does not result in rapid depressurization of the reactor vessel. The HPCI System permits the nuclear plant to be shutdown while maintaining sufficient reactor vessel water inventory until the reactor vessel is depressurized. The HPCI System continues to operate until reactor vessel pressure is below the pressure at which Low Pressure Coolant Injection [EIS:BO] operation or Core Spray System [EIS:BM] operation can be used to maintain core cooling. The HPCI System is also credited during a Station Blackout Event.

Steam which leaks from the HPCI turbine gland seal [EIS:SEAL], stop valve [EIS:SHV] and governor valve [EIS:SCV] is routed to the HPCI Gland Seal System. The Gland Seal System functions to prevent the release of the radioactive steam to the environment.

During normal reactor plant operation, the HPCI System, including the Gland Seal System, is in standby. Upon receiving an initiation signal, the Gland Seal Condenser (GSC) exhaustor/blower [EIS:FAN] automatically starts. The steam leakage from the HPCI System turbine seals and steam valve packing is vented to, and condensed in, the gland seal condenser [EIS:COND]. When the condenser hotwell water level reaches the high water level setpoint, level switches HPCI-LS-356A and 356B [EIS:LS] start the gland seal condenser pump [EIS:P]. The pump returns condensate to the HPCI booster pump suction when HPCI is in operation, or to the reactor building equipment drain sump when the system is in standby. After a 10 second time delay, if the condensate pump has not lowered the condenser water level to the high water level setpoint, the HPCI GSC HOTWELL HIGH LEVEL annunciator [EIS:ANN] will alarm in the Control Room. When the condenser hotwell level has been reduced to the low level trip set point, the pump automatically shuts off when contacts in HPCI-LS-356B open.

EVENT DESCRIPTION

On September 18, 2002, at 1425 Central Daylight Time (CDT), with Cooper Nuclear Station in Mode 1, Power Operation, at approximately 100 percent power (steady state), the Control Room received Annunciator, "HPCI Gland Seal Condenser Hotwell High Level". The alarm response procedure was reviewed and it was determined the HPCI Gland Seal Condensate Pump should have started and Pump Discharge to Reactor Building Equipment Drain Sump air operated valves [EIS:V], should have opened. These automatic actions did not occur. In accordance with the alarm response procedure, the HPCI Auxiliary Oil Pump switch was placed in the Pull-to-Lock (PTL) position. This action prevents the automatic actuation of the HPCI system in response to plant transient and accident initiation signals.

The HPCI system was declared inoperable at 1428 CDT and Technical Specification Section 3.5 1, Emergency Core Cooling Systems - Operating, Limiting Condition for Operation (LCO) Condition C was entered.

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At the time of this event CNS was in LCO 3.5.1, Condition A, with Residual Heat Removal (RHR) sub-system B out of service for scheduled heat exchanger maintenance. This required simultaneous entry into LCO 3.5.1, Condition D. Maintenance for the RHR heat exchanger was completed and the heat exchanger was declared operable at 1224 CDT on September 20, 2002. Upon completion of repairs and testing, the HPCI system was restored to operable status and the LCO Condition was exited at 1339 CDT on September 20, 2002. CNS was in LCO 3.5.1, Condition C, HPCI inoperable, for approximately 47 hours. The actual time that HPCI was unavailable for injection due to the Auxiliary Oil Pump switch being in the PTL position was 32 hours and 17 minutes.

BASIS FOR REPORT

The procedural response to this event directs that the HPCI Auxiliary Oil Pump switch be placed in the PTL position. This action prevents the automatic actuation of the HPCI system. This condition is reportable per 10CFR50.73(a)(2)(v)(D) as: Any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident.

CAUSE

CNS is currently investigating if the alarm response procedure step to place the Auxiliary Oil Pump switch in the PTL position is necessary.

SAFETY SIGNIFICANCE

With the HPCI Auxiliary Oil Pump in PTL, and when HPCI was tagged out for repair of HPCI-LS-356B, HPCI was inoperable and unavailable for injection. During the time HPCI was unavailable for injection, Reactor Core Isolation Cooling, the Control Rod Drive System and feedwater were available to provide high pressure core cooling. Additionally, if needed, the Safety Relief Valves (controlled manually or by the Automatic Depressurization System) were available to provide a means to depressurize the reactor pressure vessel so the low pressure systems could provide injection. This condition did not challenge a fuel, reactor coolant pressure, primary containment, or secondary containment boundary, nor did it impact the plant's ability to safely shut down or maintain the reactor in a safe shutdown condition.

HPCI was unavailable for injection for a total of 32 hours and 17 minutes. Assuming that HPCI was unavailable for 33 hours, the increased core damage probability (ICDP) of this event is 3.54E-08. This ICDP is less than the risk significant threshold of 1E-06. Therefore, this event was not risk significant and would be classified as GREEN.

This condition is reportable per 10CFR50.73(a)(2)(v)(D) as: Any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident. In accordance with guidance contained in NEI 99-02, Revision 2, Regulatory Assessment Performance Indicator Guideline, this condition is classified as a Safety System Functional Failure.

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CORRECTIVE ACTIONS

Immediate Action

1. HPCI-LS-356B was replaced, the HPCI system was restored to operable status and the LCO Condition was exited at 1339 CDT on September 20, 2002.

Long Term Actions include determining if the alarm response procedure step to place the Auxiliary Oil Pump switch in PTL is necessary. Additional corrective actions, if necessary, will be reported in a supplement to this report. The supplemental report will be submitted by February 18, 2003.

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS

Correspondence Number: NLS2002127

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the NL&S Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
CNS will submit a supplement to LER 2002-001 by February 18, 2003.	February 18, 2003