



Nebraska Public Power District
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NLS2004050

April 8, 2004

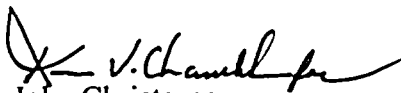
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

Subject: Licensee Event Report No. 2004-001-00
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

The purpose of this correspondence is to forward a Licensee Event Report.

Sincerely,


John Christensen
Plant Manager

/rar
Enclosure

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution

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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

1. FACILITY NAME Cooper Nuclear Station	2. DOCKET NUMBER 05000298	3. PAGE 1 OF 3
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4. TITLE
Process Weakness Results in Technical Specification Prohibited Operation

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
02	11	2004	2004	001	00	04	08	2004		05000
									FACILITY NAME	DOCKET NUMBER
										05000

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)						
		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 Paul V. Fleming, Licensing and Regulatory Affairs 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		
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)

On February 11, 2004, during validation of a valve line-up on the Service Water (SW) Gland Water system, Cooper Nuclear Station discovered that the gland water piping was cross-connected with SW subsystem "A" safety related pump discharge supplying gland water to both SW subsystems. This resulted in SW subsystem "B" being declared inoperable and required entry into a 30 day Limiting Condition for Operation (LCO). Diesel Generator (DG) 2, which is cooled by SW subsystem "B", and the Control Room Emergency Filter System (CREFS), which was aligned to the DG 2 emergency bus, were declared inoperable and required entry into 7-day Shutdown LCOs. The LCOs were entered at 0310 hours. The gland water line-up was returned to the required configuration and the LCOs were exited at 0340 hours. Further investigation determined that the cross-connected configuration had existed since restoration of the system from planned maintenance performed 21 days earlier.

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as "Any operation or condition which was prohibited by the plant's Technical Specifications [(TS)]," due to the length of time DG 2 and CREFS were inoperable, which exceeded the TS 7 day shutdown LCO.

The cause of this event was determined to be a process weakness in the Clearance Order program. Additional instructions for development of clearance orders were issued on February 13, 2004 and a revision to the station procedure for development of clearance orders was completed on April 8, 2004.

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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 (Run) at 100 percent power when the condition prohibited by Technical Specifications (TS) was discovered.

BACKGROUND

The Service Water (SW) System [EIS:BI] is designed to provide cooling water for the removal of heat from equipment, such as the diesel generators (DGs) [EIS:DG] and Reactor Equipment Cooling System [EIS:CC] heat exchangers, and to provide a supply of water for the Residual Heat Removal (RHR) [EIS:BO] heat exchangers through the Residual Heat Removal Service Water Booster System pumps, required for a safe reactor shutdown following a Design Basis Accident or transient.

The SW System consists of the Ultimate Heat Sink and two independent and redundant subsystems. The two subsystems are separated from each other so failure of one subsystem will not affect the operability of the other system.

Each set of SW pumps has a water bearing lubrication (Gland Water) supply utilizing the safety-related discharge of the SW pumps as the normal line-up. The gland water supply originates down stream of the SW pump discharge strainer and can be divisionally cross-connected to maintain bearing lubrication from the opposite division during maintenance and cleaning of the pump discharge strainer.

With one SW subsystem inoperable, the SW subsystem must be restored to operable status within 30 days. Additional Limiting Conditions for Operation (LCOs) must be entered and Required Actions taken if the inoperable SW subsystem results in an inoperable DG or RHR shutdown cooling subsystem.

EVENT DESCRIPTION

On February 11, 2004, during validation of a valve line-up on the Service Water Gland Water system, CNS discovered that the gland water piping was cross-connected with SW subsystem "A" safety related pump discharge supplying gland water to both SW subsystems. This resulted in SW subsystem "B" being declared inoperable due to loss of subsystem separation, and required entry into a 30 day LCO. DG 2, which is cooled by SW subsystem "B", and the Control Room Emergency Filter System (CREFS), which was aligned to the DG 2 emergency bus, were declared inoperable, and required entry into 7-day Shutdown LCOs. The LCOs were entered at 0310 hours. The gland water line-up was returned to the required configuration and the Shutdown LCOs were exited at 0340 hours. Further investigation determined that the cross-connected configuration had existed since restoration of the system from planned maintenance performed 21 days earlier.

BASIS FOR REPORT

DG 2, and CREFS were inoperable for 21 days, exceeding the TS 7-day shutdown LCO. This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as "Any operation or condition which was prohibited by the plant's Technical Specifications."

CAUSE

The cause of this event was determined to be a process weakness in the Clearance Order program.

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

The process for development of the clearance order to restore the cross-connected configuration of the SW gland water to the required configuration allowed the use of a note in the clearance order referring the operator to use the system operating procedure (SOP) for system restoration instead of a specific step to direct use of the SOP.

SAFETY SIGNIFICANCE

An evaluation of this event concluded that it was not risk significant. The change in the core damage probability was calculated as less than the threshold for classification as risk significant. The risk assessment included assumptions that the Service Water pumps can run 30 minutes with a loss of gland water flow, and that the average response time to restore the flow in the event of a low gland water flow condition is 20 minutes.

This event is not considered a Safety System Functional Failure as defined in NEI 99-02, Revision 2, Regulatory Assessment Performance Indicator Guideline.

CORRECTIVE ACTIONS

Immediate actions:

The system was restored to the proper configuration at 0340 hours on February 11, 2004.

Issued instructions for the work control process to require a separate entry for confirmation of clearance order release and an additional entry for confirmation of system configuration restoration. This action was completed February 13, 2004.

The Service Water system operating procedure was revised to include placement and removal of "Crosstied" tags for the pump control switches, and verification of valve lineups. The procedure revision was effective February 24, 2004.

Long Term actions:

The station procedure for development of clearance orders was revised to eliminate the possibility of improperly using notes instead of numbered steps, and to require the release sequence be coordinated with the applicable system operating procedure sequence. This action was completed on April 8, 2004.

PREVIOUS EVENTS

No previous reportable events resulting from mis-positioned components within the last three years were identified.

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

Correspondence Number: NLS2004050

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 Licensing & Regulatory Affairs Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
None	N/A