



Nebraska Public Power District

Always there when you need us

NLS2005068

August 17, 2005

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

Subject: Licensee Event Report No. 2005-003-00
Cooper Nuclear Station, Docket 50-298, DPR-46

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

Sincerely,

Stewart B. Minahan
General Manager of Plant Operations

/em

Enclosure

cc: Regional Administrator w/enclosure
USNRC - Region IV

Senior Project Manager w/enclosure
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector w/enclosure
USNRC

NPG Distribution w/enclosure

INPO Records Center w/enclosure

SORC Administrator w/enclosure

SRAB Administrator w/enclosure

Records w/enclosure

COOPER NUCLEAR STATION

P.O. Box 98 / Brownville, NE 68321-0098

Telephone: (402) 825-3811 / **Fax:** (402) 825-5211

www.nppd.com

IE22

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 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs NE0B-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means to impose an 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 Cooper Nuclear Station	2. DOCKET NUMBER 05000298	3. PAGE 1 of 4
---	-------------------------------------	--------------------------

4. TITLE
Both Diesel Generators Inoperable in Mode 4 Leads to Condition Prohibited by 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
06	21	2005	2005	- 003 -	00	08	17	2005		05000
									FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE 1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check all that apply)										
	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)							
10. POWER LEVEL 100	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)							
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)							
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)							
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)							
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)							
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)							
<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER								
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A								

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME Paul V. 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	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE). <input checked="" type="checkbox"/> NO				

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

On 6/21/2005 in Mode 1 at 100 percent power, CNS determined the Diesel Generator (DG) Diesel Oil (DO) transfer pump in-service test (IST) flow test performed on 11/5/2004 while in Mode 4 resulted in a condition prohibited by Technical Specifications (TS.) Revision 16 of the surveillance procedure dated 5/14/2004 allowed quarterly exercising of the two normally closed manual cross connects between Fuel Tanks 1 and 2 by disabling fuel transfer pumps (from the main storage tank to the day tank) by placing their switches to the OFF position and then validating cross-connect valve operation. The surveillance was performed on 7/13/2004 and 10/7/2004 in Mode 1, and on 11/5/2004 in Mode 4, without declaring both DG's inoperable. On 12/30/2004, prior to the fourth surveillance performance, operators recognized that steps to place the transfer pump switches to OFF required declaring both DG's inoperable. The procedure was revised to avoid placing both transfer pump switches to OFF, and the surveillance was subsequently performed. A Condition Report (CR) was initiated for the inadequate procedure and noted the 3 prior surveillances. In all 3 cases, there was no loss of safety function. For July and October, the surveillances were completed within the 2 hour TS action limit for Mode 1 which satisfied the TS requirement. However, for November, the TS "immediate" action limit for Mode 4 was exceeded which resulted in a condition prohibited by TS.

The root cause was that Revision 16 of the surveillance procedure was inadequate in that it did not require or caution that performing procedure steps would render both DG's inoperable. The surveillance procedure was revised on 1/22/2005 to correct the inadequacy.

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Cooper Nuclear Station	05000298	YEAR	SEQUENTIAL NUMBER	REVISION	2 of 4
		2005	-- 003	-- 000	

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

PLANT STATUS

Cooper Nuclear Station (CNS) was in Mode 1 at 100% power at the time of discovery on 6/21/2005.

BACKGROUND

The standby alternating current (AC) power system (EIS:EK) consists of two independent on-site diesel generators (DG's) (EIS:DG) adequate for maintaining the safe shutdown of the reactor following abnormal operational transients and postulated accidents in the event of failure of off-site power. Each DG unit has a fuel day tank (EIS:DC). Both day tanks are supplied from either of two main fuel storage tanks (EIS:DC). Both main fuel storage tanks combined are capable of providing sufficient fuel for seven days of operation of one DG unit under postulated accident conditions. Each fuel day tank will provide enough fuel to allow a minimum of five hours of full load operation of the DG unit.

Each of the two diesel fuel oil storage tanks is provided with its own transfer pump and piping connections to its respective fuel oil day tank. Cross-ties are provided such that either DG can be supplied from both fuel oil storage tanks.

CNS Technical Specification (TS) Limiting Condition for Operation (LCO) 3.8.1, AC Sources - Operating, requires two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System; and two DG's to be OPERABLE in Modes 1 (Power Operation), 2 (Startup) and 3 (Hot Shutdown.) If two DG's are inoperable, the Action Statement requires the restoration of one DG to OPERABLE status in 2 hours.

LCO 3.8.2, AC Sources – Shutdown, requires one qualified circuit between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) and one DG capable of supplying one division of the onsite Class 1E AC electrical power distribution subsystem(s) in Modes 4 (Cold Shutdown) and 5 (Refueling). If the required DG is inoperable, the Action Statement requires that action be initiated to restore the required DG to OPERABLE status "Immediately."

CNS TS 1.3 says that when "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.

EVENT DESCRIPTION

On 6/21/2005, during an NRC inspection, CNS determined that the DG Diesel Oil (DO) transfer pump in-service test (IST) flow test performed on 11/5/2004 while in Mode 4 resulted in a condition prohibited by TS.

On 5/14/2004, surveillance procedure for DG DO transfer pump IST flow test for Division 1 was revised to allow quarterly exercising of the two normally closed manual cross connect valves between DG Fuel Tanks 1 and 2. The new Revision 16 of the procedure allowed both DG fuel transfer pumps (from main storage tank to day tank) to be disabled from automatic start to permit validating cross-connect valve operation. The procedure instructed operators to record both tank level changes while opening these valves, thus validating that the valves have opened. Disabling the fuel transfer pumps was achieved by placing their switches to the OFF position. No steps were included in the procedure to declare both DG's inoperable. Performance of the surveillance takes approximately 30 minutes.

The surveillance was performed on 7/13/2004 and 10/7/2004 while the plant was in Mode 1, and on 11/5/2004 in Mode 4, without declaring both DG's inoperable. On 12/30/2004, as operators were preparing to execute the procedure for the fourth time, operators recognized that the steps to place the

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Cooper Nuclear Station	05000298	YEAR	SEQUENTIAL NUMBER	REVISION	3 of 4
		2005	-- 003	-- 000	

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

transfer pump switches to OFF would require declaring both DG's inoperable. The surveillance procedure was revised to avoid placing both transfer pump switches to OFF, and the surveillance was subsequently performed. A Condition Report (CR) was initiated and referred to the three earlier surveillances when both DG 1 & 2 were rendered inoperable.

During the CR initial reportability review, CNS determined that both DG's were simultaneously inoperable during the three events. In all 3 cases, there was no loss of safety function because DG day tanks will provide enough fuel to allow a minimum of five hours of full load operation of the DG. For July and October, the surveillances were completed within the 2 hour TS action limit for Mode 1 which satisfied the TS requirement. For November, the TS "immediate" action limit for Mode 4 was exceeded, but a condition prohibited by TS was judged to not exist due to the short time it took to execute the surveillance being within the completion time required by TS. CNS then categorized the CR as "Not-Reportable".

In June of 2005, NRC inspectors questioned the reportability determination for the 11/5/2004 event. On 6/21/2005, CNS reviewed the November 2004 event, and agreed that it was a condition prohibited by TS.

BASIS FOR REPORT

This event is being reported as a condition prohibited by plant TS per 10 CFR 50.73(a)(2)(i)(B),

SAFETY SIGNIFICANCE

No Safety System Functional Failure occurred. The inadequate evaluation of reportability is not an equipment or hardware related performance issue. In addition, the required DG was considered available during the surveillance since the restoration of the fuel oil transfer pump is procedurally directed and can be accomplished well within day tank depletion time. The condition did not challenge a reactor fuel, reactor coolant pressure, primary containment, or secondary containment boundary. The condition did not impact the plant's ability to safely shutdown or maintain the reactor in a safe shutdown condition.

As a consequence, the condition has no impact on the baseline Probabilistic Risk Assessment model and results in no change in core damage frequency.

CAUSE

The root cause was that Revision 16 of the surveillance procedure was inadequate in that it did not require or caution that performing procedure steps would render both DG's inoperable.

CORRECTIVE ACTION

Immediate action taken was to counsel individuals involved with the surveillance procedure Revision 16 on adherence to process requirements of changing procedures, attention to detail, and the need for rigor in reviewing and approving procedure changes.

The corrective action taken to prevent recurrence was to revise the surveillance procedure for DG DO transfer pump IST flow test for Division 1 to remove steps that allow both DG's to be simultaneously inoperable. This action was completed on 1/22/2005.

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Cooper Nuclear Station	05000298	YEAR	SEQUENTIAL NUMBER	REVISION	4 of 4
		2005	-- 003	-- 000	

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

PREVIOUS EVENTS

On April 10, 2000, during performance of the System Leakage Test surveillance procedure for refuel outage RE-19, the TS limit for Reactor Coolant System (RCS) heat-up rate was exceeded in Reactor Recirculation (RR) [EIS:AD] loop B. The failure to meet TS Surveillance Requirement acceptance criteria was not recognized, and the required evaluation to determine if the RCS is acceptable for operation was not performed prior to start up from the RE-19 refuel outage. On March 20, 2003, with CNS in Mode 5 for refuel outage RE-21, a review of the surveillance procedure and past performance of the procedure was performed in support of a modification to replace temperature recorders. During this review the above condition was discovered. This event was the result of inadequate procedural guidance for equalizing RCS temperatures in preparation for starting an idle RR pump, and evaluating available RCS temperature data. This condition was reported to the NRC in LER 2003-03.

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

Correspondence Number: NLS2005068

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

COMMITMENT	COMMITMENT NUMBER	COMMITTED DATE OR OUTAGE
None		