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April 11, 2014

AEP-NRC-2014-29
10 CFR 50.73

Docket No.: 50-315

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike,
Rockville, MD 20852

Donald C. Cook Nuclear Plant Units 1 and 2
LICENSEE EVENT REPORT 315/2014-001-00
Non-Compliance with LCO 3.4.3 during Reactor Coolant System Vacuum Fill

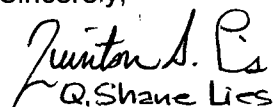
In accordance with the criteria established by 10 CFR 50.73, Licensee Event Report System, the following report is being submitted:

LER 315/2014-001-00: "Non-Compliance with LCO 3.4.3 during Reactor Coolant System Vacuum Fill"

There are no commitments contained in this submittal.

Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Manager, at (269) 466-2649.

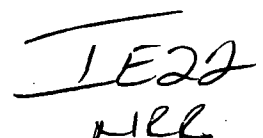
Sincerely,

 for J.P. Gebbie
Q. Shane Lies
Joel P. Gebbie
Site Vice President

JEN/raw

Enclosure

c: J. T. King, MPSC
MDEQ – RMD/RPS
NRC Resident Inspector
C. D. Pederson, NRC Region III
T. J. Wengert, NRC Washington, DC
A. J. Williamson – Ft. Wayne AEP, w/o enclosures





LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@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 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 Donald C. Cook Nuclear Plant Unit 1	2. DOCKET NUMBER 05000315	3. PAGE 1 OF 3
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4. TITLE
Non-Compliance with LCO 3.4.3 During Reactor Coolant System Vacuum Fill

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
02	20	2014	2014	001	00	04	11	2014	Donald C. Cook Nuclear Plant Unit 2	05000316
									FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE 5	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (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)
	<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)
10. POWER LEVEL 000	<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	
LICENSEE CONTACT Michael K. Scarpello, Regulatory Affairs Manager	TELEPHONE NUMBER (Include Area Code) (269) 466-2649

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 <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE MONTH: _____ DAY: _____ YEAR: _____
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On February 20, 2014, following a review of a Pressurized Water Reactor Owners Group notification of a recent Non Cited Violation at another nuclear power plant, Donald C. Cook Nuclear Plant (CNP) staff determined that CNP was in a similar circumstance of having been in an Operation or Condition Prohibited by Technical Specifications (TS).

At the end of each refueling outage, CNP draws a vacuum on the Reactor Coolant System (RCS) in order to refill the system. The RCS temperature and pressure (T/P) Limiting Condition for Operation (LCO), LCO 3.4.3, references two associated T/P operational limit figures, both of which terminate at a lowest pressure of 0 pounds per square inch gauge (psig). Therefore, operation at a vacuum is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), Operation or Condition Prohibited by TS.

The apparent cause is that the 10 CFR 50.59 screening for the original RCS vacuum fill procedures did not consider LCO 3.4.3 and its associated figures. The procedures have been put on administrative hold to preclude drawing a vacuum on the RCS until the LCO is revised to accommodate operation at a vacuum.



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

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@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 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	2. DOCKET	6. LER NUMBER			3. PAGE
		YEAR	SEQUENTIAL NUMBER	REV NO.	
Donald C. Cook Nuclear Plant Unit 1	05000315	2014	- 001 -	00	2 OF 3

NARRATIVE

Energy Industry Identification System codes are identified in the text as [XX].
The following information applies to both Unit 1 and Unit 2.

INTRODUCTION

On February 20, 2014, following a review of a Pressurized Water Reactor Owners Group notification of a recent Non Cited Violation at another nuclear power plant, CNP staff determined that CNP was in a similar circumstance of having been in an Operation or Condition Prohibited by TS.

Plant operating condition in all instances was Mode 5 following refueling. There were no inoperable structures, components or systems that contributed to the event.

EVENT DESCRIPTION

The RCS [AB] T/P LCO, LCO 3.4.3 references two associated T/P operational limit figures, both of which terminate at a lowest pressure of 0 psig.

LCO 3.4.3 states:

RCS pressure, RCS temperature, and RCS heatup and cooldown rates shall be maintained within the limits specified in Figures 3.4.3-1 and 3.4.3-2 with:

- a. A maximum heatup of 60 degrees Fahrenheit (F) in any one hour period;
- b. A maximum cooldown of 100 degrees F in any one hour period; and
- c. A maximum temperature change of ≤ 5 degrees F in any one hour period, during hydrostatic testing operations above system design pressure.

Applicability: At all times.

During vacuum fill of the RCS, pressure is lowered to less than 0 psig (to approximately 25 inches of mercury vacuum, or -12.3 psig). Because the referenced LCO Figures do not include RCS pressure below 0 psig, operation with the RCS at a vacuum is prohibited by TS. This is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), Operation or Condition Prohibited by TS.

Over the previous three years, Unit 1 and Unit 2 each had two refueling outages. At the end of the outages, the vacuum fill evolution was utilized to refill the RCS. Dates that the RCS was operated below 0 psig are as follows:

Unit 1

October 18, 2011

May 7, 2013

May 8, 2013

May 9, 2013

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

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NARRATIVE

Unit 2
 April 18, 2012
 April 19, 2012
 April 20, 2012

October 31, 2013
 November 1, 2013

CAUSE OF EVENT

The Apparent Cause is that the 10 CFR 50.59 screening for the original RCS vacuum fill procedures did not consider LCO 3.4.3 and its associated figures.

EVENT ANALYSIS

Both Unit 1 and Unit 2 have operated at less than 0 psig during RCS vacuum fill. Both units' procedures direct RCS pressure to be taken to a vacuum of approximately 25 inches of mercury for vacuum fill of the system.

The engineering evaluation performed for the initial RCS vacuum fill procedures did review the applicability to the RCS, Residual Heat Removal System (RHR) [BP], and the Reactor Pressure Vessel [RPV]. The evaluation concluded that there are no physical system limitations preventing taking the RCS or RHR to a vacuum. Per this evaluation, there was no safety significance identified by operating the RCS at a vacuum during the vacuum fill evolution, therefore, continued operation of the RCS is acceptable.

CORRECTIVE ACTIONS

Taken:

Operational procedures directing vacuum fill of the RCS have been placed in an Administrative Hold status to preclude operating the RCS in a vacuum condition. CNP staff has submitted a License Amendment Request to amend TSs to accommodate operation of the RCS under vacuum.

PREVIOUS SIMILAR EVENTS

A review of Licensee Event Reports for the past three years found no similar events.