NRC FORM 366 (6-1998) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

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

APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001

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 Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If 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.

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Cook Nuclear Plant Unit 1	05000-315	1 OF 3

TITLE (4)

Requirements of Technical Specification 4.0.5 Not Met for Boron Injection Tank Bolting

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
05	21	1999	1999	014	00	06	18	1999	Cook Nuclear Plant Unit 2	05000-316

OPERATING MODE (9)	5
POWER LEVEL (10)	0%

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

	20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
	20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
	20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
	20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
	20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A	
	20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Mr. Dennis D. Snodgrass, Compliance Engineer	(616) 465-5901 X1627

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

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

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

On May 21, 1999, the Engineering Programs group determined that the Boron Injection Tank (BIT) manway bolts were not included in the ISI Program, creating a missed examination for the previous ISI interval. The bolts were being reviewed for surveillance requirements for replacement of two bolts that were identified with no markings by the System Engineer while performing an Expanded System Readiness Review walkdown. Pressure retaining bolting greater than 2 inches in diameter are required to be volumetrically examined once each ISI interval per the 1989 ASME XI Code. The bolting on the Boron Injection Tank manway is 2-1/2 inches in diameter and as such is required to be in the ISI Program. This is reportable per 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications (T/S), for the failure to comply with T/S 4.0.5 on the ISI program. This condition was found to exist on both Units. The apparent cause for this event is programmatic weakness. The BIT manway bolts were removed from the ISI Program without proper review, approval and documentation. This occurred in the early 1980's when ISI Program correspondence and documentation was less formal. No immediate corrective actions were required as the Units are currently in Mode 5 making the BIT and associated piping in the current Mode exempt from examination in accordance with the 1989 ASME Section XI Code. The BIT manway bolting has been administratively placed in the ISI Program for the third ISI interval, and will be examined prior to Mode 4. Review of the ISI database did not identify any other Code category C-D bolts that had not been examined during the previous ISI intervals. Engineering has developed an action plan to review the ISI Program for compliance with applicable regulatory requirements prior to restart. Based on the System Engineer walkdown identifying no degraded BIT manway bolts and a work history of no bolt failures, it has been determined that the failure to perform BIT manway bolting examinations for the previous ISI intervals had minimal impact on the safe operation of either Unit.

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

Conditions Prior To Event

Unit 1 Mode 5 in Cold Shutdown
Unit 2 Mode 5 in Cold Shutdown

Description Of The Event

On May 21, 1999, the Engineering Programs group determined that the Boron Injection Tank (BIT) manway bolts were not included in the ISI Program, creating a missed examination for the previous ISI interval. The bolts were being reviewed for surveillance requirements for replacement of two bolts that were identified with no markings by the System Engineer while performing an Expanded System Readiness Review walkdown.

The bolting on the Boron Injection Tank manway is 2-1/2 inches in diameter. Bolting greater than 2 inches in diameter is required to be volumetrically examined once each ISI interval per the 1989 ASME XI Code, Category C-D, Item no. C4.10, "Class 2 Pressure Vessel Bolting Greater than 2 Inches".

The investigation determined the first ISI interval identified the BIT manway bolts as requiring examination. The Unit 2 bolts were examined during the first ISI interval, however Unit 1 examination can not be verified. When the ISI Programs were updated for the second interval, the BIT manway bolts were not included in the ISI database and examinations were not performed on either Unit.

Cause Of The Event

The apparent cause for this event is programmatic weakness. The BIT manway bolting was removed from the ISI Program without proper review, approval and documentation. This occurred in the early 1980's when ISI Program correspondence and documentation was less formal.

Analysis Of The Event

This LER is submitted in accordance with 10CFR50.73(a)(2)(i)(B), a condition prohibited by the plant's Technical Specifications, for the failure to comply with T/S 4.0.5 on the ISI program.

Technical Specification 4.0.5 requires inservice inspection of ASME Code Class 1, 2, and 3 components per the 1989 ASME Section XI Code. The Boron Injection Tanks are Class 2 components and examination of the manway bolting is intended to identify degraded bolting conditions before they worsen.

Visual observation of BIT manway bolting during the Expanded System Readiness Review walkdown indicated that there were no degraded bolts. Review of maintenance records did not identify any problems with, or a failure of these bolts. Based on these factors, it has been concluded that the failure to perform BIT manway bolting examinations for the previous ISI intervals had minimal impact on the safe operation of either Unit.

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

CORRECTIVE ACTIONS

The Boron Injection Tanks (BIT) bolting has been administratively placed in the ISI database for the third ISI interval. Examination of the bolts has been scheduled and will be performed prior to Mode 4.

A review of the ISI database did not identify any other Code Category C-D bolts that had not been examined during the previous ISI intervals. The drawings for Class 2 bolted components were reviewed to determine if there were any other Category C-D bolting not included in the ISI database. None were found. Engineering has developed an action plan to review the ISI Program for compliance with applicable regulatory requirements prior to restart.

The ISI Program and the associated ISI database have been modified to include the BIT bolting examination requirement.

A lesson learned will be placed in the program notebook to alert personnel of the previously missed examinations and will ensure ISI Program Coordinators are aware of past problems on this component.

To prevent recurrence, PMI-5070, Inservice Inspection, will be revised to add a note that when the ISI Program or portions of the Program are revised, a review shall be made of the changes in accordance with the requirements of 10 CFR 50.59.

Engineering Programs has performed self-assessments of the ASME Section XI Inservice Inspection Program to review for effective implementation, documentation, organization, and degree of Code compliance. These self-assessments have resulted in an action plan to review the ISI Program for compliance with all regulatory requirements prior to restart.

SIMILAR EVENTS

316/98-041-00
316/98-043-00
315/99-002-00