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 FACIL: 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME AUTHOR AFFILIATION
 SAMPSON, J.R. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 BLIND, A.A. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 91-001-00: on 910107, fire protection sprinkler sys for turbine-driven AF pump room & corridor removed from svc & roving fire watch established. Caused by misinterpretation of TS. Individuals counseled & memo issued. W/910211 ltr.

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 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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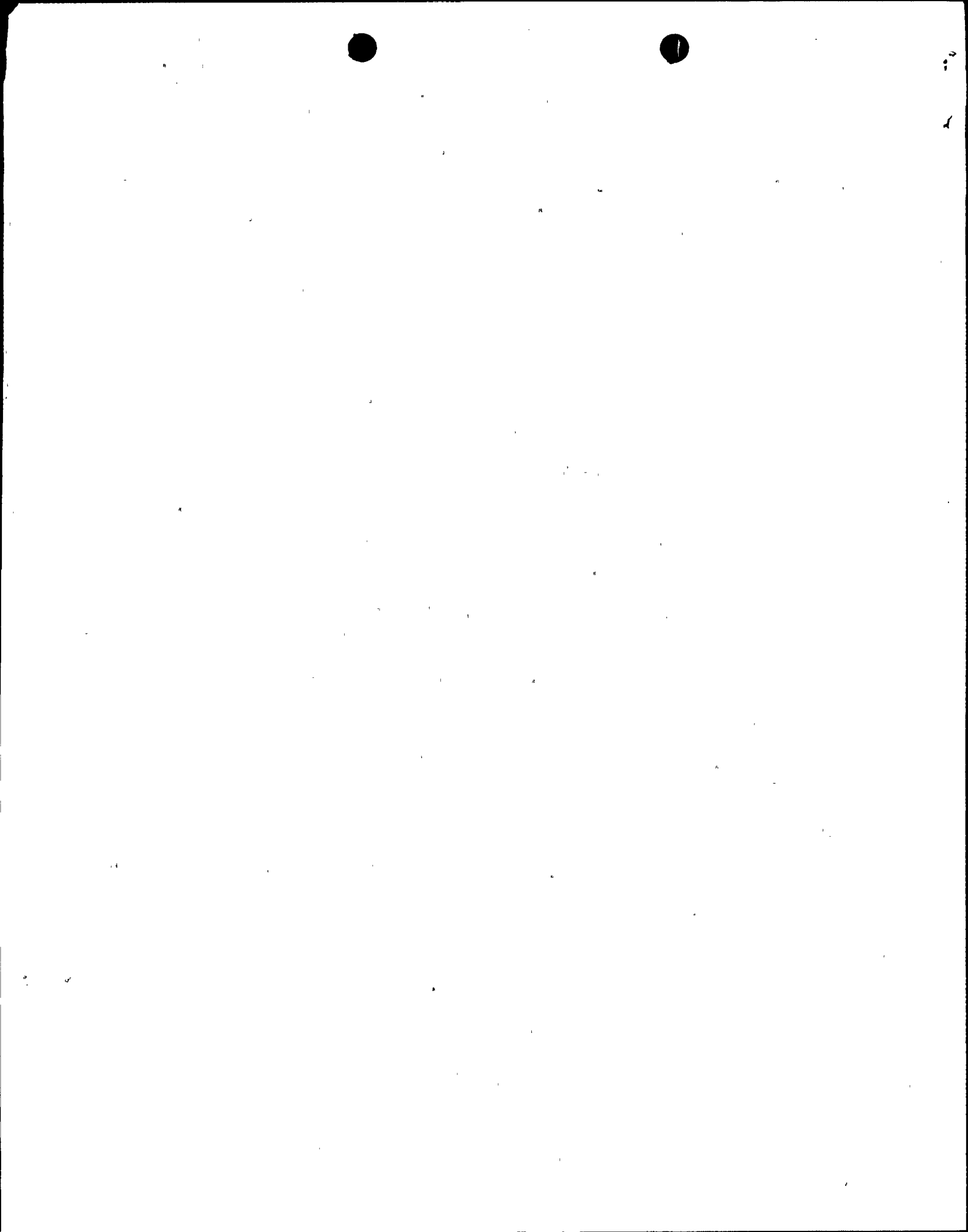
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	NRR/DLPQ/LHFB11	1	1	NRR/DLPQ/LPEB10	1	1
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616 465 5901



February 11, 1991

United States Nuclear Regulatory Commission
Document Control Desk
Rockville, Maryland 20852

Operating Licenses DPR-74
Docket No. 50-316

Document Control Manager:

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

91-001-00

Sincerely,

A.A. Blind
A.A. Blind
Plant Manager

AAB:sb

Attachment

c: D.H. Williams, Jr.
A.B. Davis, Region III
M.P. Alexich
P.A. Barrett
J.E. Borggren
R.F. Kroeger
B. Walters - Ft. Wayne
NRC Resident Inspector
T. Colburn - NRC
J.G. Keppler
M.R. Padgett
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B.A. Svensson

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) D. C. Cook Nuclear Plant, Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 3 1 6	PAGE (3) 1 OF 0 4
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TITLE (4) **A Roving Firewatch (FW) was Posted Instead of the Required Continuous FW Due to Misinterpretation of the TS 3.7.9.2 Requirements**

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 NAMES	DOCKET NUMBER(S)
0 1	0 7	9 1	9 1	0 0 1	0 0	0 2	1 1	9 1		0 5 0 0 0

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)				
POWER LEVEL (10) 1 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)	
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)		
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)		
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)		
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME J. R. Sampson, Operations Superintendent	TELEPHONE NUMBER 6 1 1 6 4 1 6 5 1 - 1 5 9 1 0 1 1
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14) <input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH DAY YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On January 7, 1991, at 0856, the fire protection sprinkler system for the turbine-driven auxiliary feedwater pump (TDAFP) room and the auxiliary feedwater (AFW) pump corridor was removed from service and a roving firewatch (FW) was established in the TDAFP room instead of the required continuous FW. The Unit Supervisor (senior reactor operator [SRO] licensed) reviewed Technical Specification (TS) 3.7.9.2 and TS table 3.7-5B to determine the FW requirements. The TS table describes the AFW pump corridor and the TDAFP room in the same line item entry. The TS 3.7.9.2 action statement allows establishing a roving FW if there is operable fire detection in the area. The Unit Supervisor interpreted the TDAFP room and AFW pump corridor as being one area and that the operable fire detection in AFW pump corridor allowed establishing a roving FW. The fact that the TDAFP room doors to the AFW corridor are administratively controlled in the open position seemed to support this interpretation. A second SRO reviewed and concurred with the Unit Supervisor's interpretation. The sprinkler system was restored to operable status at 1625 on January 8, 1991. On January 23, 1991, it was identified that a continuous FW should have been established in the TDAFP room. This event was reviewed with the involved individuals and a lessons learned memo was issued to Operations Department personnel.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 600 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) D. C. Cook Nuclear Plant, Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 3 1 6	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 1	- 0 0 1	- 0 0	0 2	OF 0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

Conditions Prior to Occurrence

Unit One in Mode Three (Hot Standby)
Unit Two in Mode One (100 Percent Reactor Thermal Power)

Description of Event

On January 7, 1991, at 0856, the fire protection sprinkler system (EIIS/KP-SRNK) for the turbine-driven auxiliary feedwater pump (TDAFP) (EIIS/BA-P) was removed from service and a roving firewatch (FW) was established instead of the required continuous FW.

A red tag clearance was issued on January 7, 1991, to remove fire protection sprinkler valve (EIIS/KP-XCV) 2-ZFP-192 from service to allow raising one sprinkler head for a design change. The affected sprinkler system provides protection to the corridor in front of the auxiliary feedwater (AFW) pumps of both units and to the unit 2 TDAFP room.

The Unit Supervisor (senior reactor operator [SRO] licensed) reviewed the TS 3.7.9.2 action statement and TS table 3.7-5B which address the involved sprinkler system. The action statement allows the establishment of a roving FW if the fire detection system (EIIS/IC) in the affected area is operable. The TS table line item for the affected sprinkler is listed as "auxiliary turbine driven feedwater pump and pump corridor." The Unit Supervisor believed that the TS considered this as one area and that the operable fire detection in the AFW pump corridor would allow the establishment of a roving FW. This interpretation of the TS was further supported by the fact that the double doors from the TDAFP room to the AFW pump corridor are administratively controlled in the open position. The Unit Supervisor's FW posting decision was reviewed and determined acceptable by a second SRO.

The roving FW for the unit 2 TDAFP room and the AFW pump corridor was established in conjunction with placing the clearance on 2-ZFP-192 at about 0856 on January 7, 1991. The physical work for the design change was completed on January 8, 1991, and the red tag clearance was removed. A surveillance test was performed at 1625 on January 8, 1991, to demonstrate that the sprinkler system was operable and aligned for automatic actuation. On January 23, 1991, it was identified that since the TDAFP room does not have a fire detection system, a continuous FW should have been posted in the TDAFP room.



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		YEAR 9 1	SEQUENTIAL NUMBER - 0 0 1	REVISION NUMBER - 0 0	OF 0 3	OF 0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

Cause of Event

This event was caused by the misinterpretation by the Unit Supervisor that the fire detection system in the AFW pump corridor covered the TDAFP room for purposes of the TS 3.7.9.2. action statement.

Analysis of Event

This event is considered reportable per the requirements of 10CFR50.73(a)(2)(i)(B) since TS 3.7.9.2 required a continuous FW in the TDAFP room instead of the roving FW which was posted. The sprinkler system for the TDAFP room was inoperable from 0856 on January 8, 1991, until 1625 on January 9, 1991, for a total period of 31 hours and 29 minutes.

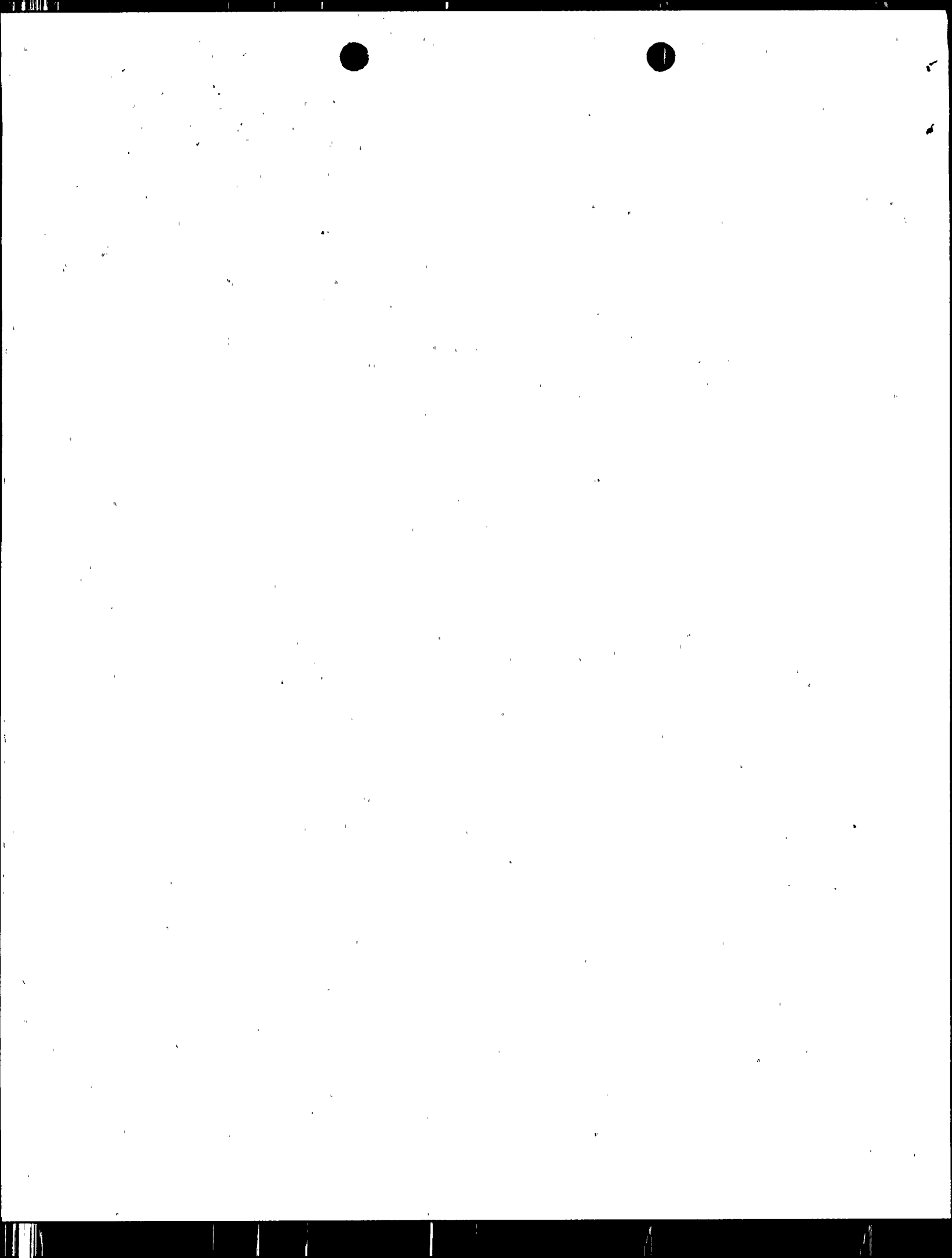
The roving FW patrolled the affected area about every half hour during the period of inoperability. In addition, it is believed that the fire detection in the AFW pump corridor would have alarmed in the event of a fire in the TDAFP room since the TDAFP room entry doors to the corridor were open during this event. Based on the half hour roving FW patrol, the operable fire detection in the AFW pump corridor and the low combustibile loading in the TDAFP room, it is concluded that this event did not constitute a significant hazard to the health and safety of the public, nor did it involve unreviewed safety questions as defined in 10CFR50.59.

Corrective Action

This event was reviewed with the involved individuals to address the need to consider the TDAFP room and the AFW pump corridor as two separate areas for application of the TS 3.7.9.2 action statement FW requirement. A memorandum was issued to Operations Department personnel to address the lesson learned from this event.

Failed Component Identification

None



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

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 1	- 0 0 1	- 0 0	0 4	OF 0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

Previous Similar Events

The following events were identified where a roving FW was established when a continuous FW should have been:

- 50-316/88-008
- 50-315/90-001

