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ACCESSION NBR: 9110300308 DOC. DATE: 91/10/24 NOTARIZED: NO DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
 AUTH. NAME AUTHOR AFFILIATION
 WOJCIK, J.T. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 BLIND, A.A. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIPIENT NAME RECIPIENT AFFILIATION

SUBJECT: LER 91-008-00: on 910924 determined that four radioactive
 calibr sources not leak tested per Tech Specs. Caused by
 inadequate procedural detail. Sources leak tested. Improper
 example in procedure deleted. W/911024 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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	REG FILE Q2	1 1	RES/DSIR/EIB	1 1
	RGN3 FILE 01	1 1		
EXTERNAL:	EG&G BRYCE, J.H	3 3	L ST LOBBY WARD	1 1
	NRC PDR	1 1	NSIC MURPHY, G.A	1 1
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Indiana Michigan
Power Company
Cook Nuclear Plant
One Cook Place
Bridgman, MI 49106
616 465 5901



October 24, 1991

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

Operating Licenses DPR-58
Docket No. 50-315

Document Control Manager:

In accordance with the criteria established by
10 CFR 50.59 entitled Licensee Event Report System, the
following report is being submitted:

91-008-00

Sincerely,

A. A. Blind
Plant Manager

AAB:sb

Attachment

c: D. H. Williams, Jr.
A. B. Davis, Region III
E. E. Fitzpatrick
P. A. Barrett
B. F. Henderson
R. F. Kroeger
B. Walters - Ft. Wayne
NRC Resident Inspector
T. Colburn - NRC
J. G. Keppler
M. R. Padgett
G. Charnoff, Esq.
D. Hahn
INPO
S. J. Brewer/B. P. Lauzau
B. A. Svensson

9110300308 911024
PDR ADCK 05000315
S PDR

Handwritten initials/signature

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) Donald C. Cook Nuclear Plant - Unit 1 DOCKET NUMBER (2) 0 | 5 | 0 | 0 | 0 | 3 | 1 | 5 PAGE (3) 1 OF 0 4

TITLE (4) Four Radioactive Sealed Sources Not Leak Tested In Accordance with Technical Specifications Due to Misclassification

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	9	2	9	1	0	0	1	0	D. C. Cook Plant Unit 2		0 5 0 0 0 3 1 6
0	9	2	9	1	0	0	1	0			0 5 0 0 0

OPERATING MODE (9) 1

POWER LEVEL (10) 1 | 0 | 0

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

<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)
<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.38(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"/> 50.38(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(iii)	<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. T. Wojcik - Technical Physical Sciences Department Superintendent TELEPHONE NUMBER 6 | 1 | 6 | 4 | 6 | 5 | - | 5 | 9 | 0 | 1

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

On September 24, 1991 it was determined that four radioactive calibration sources had not been leak tested in accordance with Technical Specifications 3/4.7.7 (Unit 1) and 3/4.7.8 (Unit 2).

The tests had not been performed since the sources were received on site in April of 1987. The reason for the tests not being performed is that they had been misclassified as unsealed sources due to inadequate procedural detail. When it was determined that the sources were actually sealed, leak tests were performed. The results of the tests were satisfactory, less than 0.005 microcuries of removable contamination. In addition, all sources were evaluated for the appropriate classifications.

To prevent recurrence an improper example has been removed from the procedure. Further, additional enhancements to the procedure and technician training are planned.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1) Donald C. Cook Nuclear Plant Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 3 1 5	LER NUMBER (6)		PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 1	- 0 0 8	- 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 One (Power Operation)
Unit Two in Mode One (Power Operation)

Description of Event

During the routine revision of an instrument calibration procedure it was discovered that four radioactive calibration sources had been classified as unsealed sources. The tests had not been performed since the sources were received on site in April of 1987. In actuality the sources were sealed sources and should not have been exempted from being tested for leakage in accordance with Technical Specifications.

The list of sources is as follows:

<u>Source Geometry</u>	<u>Isotopes</u>	<u>Total Activity (μCi)</u>	<u>Date Received</u>
Particulate Filter	Ba-133 Cs-137 Co-60	151.7	4/1/87
Particulate Filter	Ba-133 Cs-137 Co-60	752	4/1/87
Silver Zeolite Cartridge	Ba-133 Cs-137 Co-60	148.5	4/1/87
Silver Zeolite	Ba-133 Cs-137 Co-60	540	4/1/87

Investigation into the classification of sources revealed that if the source did not appear solid in nature, i.e., button source, the source was not considered to be a solid sealed source. Further investigation revealed the four sources that are sealed sources that are greater than 100 microcuries of beta and/or gamma emitting material and thus require leak and/or contamination testing to verify that the sources are free of greater than 0.005 microcuries of removable contamination.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 1	— 0 0 8	— 0 0	0 3	OF 0 4

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

Cause Description

The cause of the condition is inadequate procedural detail. The procedure, Radioactive Source Control, uses the term "capsule" for the classification of sources. Discussions with Radiation Protection technicians responsible for classifications indicated that the definition of "capsule" is very narrow, specifically, saran wrap or mylar coverings were not considered to be a capsule and therefore did not require the "sealed" classification. In addition, an example used in the procedure to assist in the classification was incorrect in most situations. Further, technician training and qualification does not specify how to determine if a source is sealed or unsealed.

Analysis of the Event

The failure to leak test the sources is a violation of Technical Specification 3/4.7.7 (Unit One) and 3/4.7.8 (Unit Two) and is reportable pursuant to 10 CFR 50.73(a)(2)(i)(b).

The sources were inventoried on a quarterly basis and stored under lock and key. Radiological surveys are performed on all personnel and material before release from the restricted area. No licensed radioactive material is permitted to be released for unrestricted use. Further, upon discovery the sources were leak tested and found to be less than 0.005 microcuries of removable contamination. Had the sources leaked, it would have been detected during scheduled calibrations of the Post Accident counting instrumentation, which is conducted on an annual basis. Therefore, the health and safety of the public was not affected.

Corrective Action

The sources were satisfactorily leak tested. In addition all sources were evaluated for the appropriate classifications.

To prevent recurrence, the improper example in the procedure has been deleted. The procedure will be further enhanced to require leak testing of all sources that exceed the activity requirements of Technical Specifications and clarify the definition of a sealed source.

In addition, training criteria will be revised to be specific in the determination of what constitutes a sealed source.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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		9 1	- 0 0 8	- 0 0	0 4	OF	0 4

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

Failed Component Identification

None.

Previous Similar Events

None.