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FACIL:50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316
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RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 94-011-00:on 941028,missed liquid effluent batch release sample compositing analysis surveillance due to lack of adeqate counting room program oversight.Current liquid release procedures have been revised.W/941212 ltr.

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

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INDIANA
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December 12, 1994

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 50.73 entitled Licensee Event Report System, the following report is being submitted:

94-011-00

Sincerely,

A. A. Blind
Plant Manager

/sb

Attachment

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IE22

NRC FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), 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.

LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Donald C. Cook Nuclear Plant	05000 315	1 OF 3

TITLE (4) Missed Liquid Effluent Batch Release Sample Compositing Analysis Surveillance Due to Lack of Adequate Counting Room Program Oversight

EVENT DATE (5)			LER NUMBER (6)			REPORT NUMBER (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
									Cook - Unit 2	05000 316
10	28	94	94	-- 011 --	00	12	12	94	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	1
POWER LEVEL (10)	100

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

20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER
20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	(Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
D. O. Morey - Chemistry Superintendent	(616) 465-5901 X2502

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)		EXPECTED SUBMISSION DATE (15)	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 October 28, 1994, it was discovered that three of six liquid effluent batch release samples from the month of October could not be located. Technical Specification 4.11.1.1.1 requires that liquid effluent batch release samples be composited on a monthly and quarterly basis. When the samples could not be located, it was assumed that they had been disposed of, and the three available samples were composited and analyzed.

On November 18, 1994, it was determined that the event was reportable under 10CFR50.73(a)(2)(i)(B).

This event resulted from a lack of oversight of the counting room program which resulted in the need to use multiple procedures to complete a single task.

The procedures will be revised to ensure proper retention of the samples for monthly and quarterly compositing.

During the month of October no abnormal operation occurred that would have caused a shift in the normal radionuclide composition of effluents. At no time was the health and safety of the public affected by this event as each liquid effluent batch was sampled and analyzed prior to release and showed no abnormal results.

Conditions Prior to Occurrence

Unit 1 in Mode 1 at 100% power, Unit 2 shutdown in Mode 5.

Description of Event

On October 28, 1994, Chemistry personnel attempted the compositing and analyses of the liquid effluent batch releases for the month of October, as required by Technical Specification 4.11.1.1.1. It was discovered at this time that three of the six liquid effluent batch release samples from that period could not be located.

The samples are normally stored in the counting room after the batch tank is released, until they are needed for the monthly and quarterly composites. When the samples could not be located, it was concluded that they had been disposed of. The three available samples were then composited and analyzed.

More time was required than was originally anticipated in performing the investigation. In general, a lack of identifiable leads or knowledge of the event inhibited the identification of the root cause. In addition, the radiochemistry performance engineer determined it prudent to investigate for perturbations in the operational history of the units and the radwaste system performance. Nuclide analyses bracketed before and after this event were carefully reviewed to ensure the expected activity was consistent throughout the event period. These investigations culminated in confidence in the Analysis of Event Section. By November 18, 1994, a thorough review of the event had been conducted and the event was determined to be reportable.

Cause of Event

The cause of this event is attributed to deficiencies in the liquid release procedure in that the requirements and direction for compositing the sample are not clearly and coherently defined. In conjunction, a general lack of awareness exists relative to the procedure that does contain compositing requirements. This combination has led to confusion and uncertainty in the Production section about the requirements. Subsequently, some samples were not placed in the designated area which resulted in the inadvertent disposal of three samples prior to satisfying the compositing requirement. Programmatically, the root cause is a lack of adequate oversight in the counting room.

Analysis of Event

This event is being reported in accordance with 10CFR50.73(a)(2)(i)(B) as operation prohibited by the plant's Technical Specifications. Technical Specification 4.11.1.1.1 required that the liquid effluent batch releases be composited and analyzed on a monthly and quarterly basis. The failure to retain all samples for the month of October for compositing is a violation of the Technical Specification surveillance requirements.

Analysis of Event (cont'd)

The pre-release sample results from the batch releases that were not available for compositing were reviewed, as was plant operation and work activities for the month of October. The samples showed no abnormal activity. The review of plant operation and work activities showed nothing unusual during the month of October which would have caused a shift in the normal radionuclude composition. It was concluded that the missing samples were similar in composition to those remaining samples which were available for compositing, and at no time was the health and safety of the public affected by this event.

Corrective Action

The current liquid release procedures have been revised by change sheet to correct the immediate concern. The procedures used for this evolution will be revised to provide effective and coherent guidance for the entire liquid release program, including the compositing requirements. As part of the Chemistry procedure upgrade project, these simplified procedures will be implemented by early March, 1995.

To improve the programmatic oversight in the counting room, the roles of the radiochemistry performance engineer and the counting room supervisor will be clearly defined and documented. This item will be formalized by January 31, 1995. In addition, the management expectation of program ownership was immediately verbally communicated to the department. This item will be formalized by January 31, 1995.

To further improve the radiochemistry program, a self-assessment will be conducted focusing on the human factors aspect of the tasks being performed. This assessment will be completed by June 30, 1995.

Previous Similar Events

316/93-010
316/93-002
315/92-004
315/92-013
316/91-003

Failed Component Identification

None