

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9806020188 DOC.DATE: 98/05/26 NOTARIZED: NO DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
 AUTH.NAME AUTHOR AFFILIATION
 SCHOEPP, P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 SAMPSON, J.R. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-025-00: on 980424, plant personnel determined that surveillance requirements of Tech Specs 4.6.5.1.b.3 were not met. Caused by lack of attention to detail. Procedures revised. W/980525 ltr.

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

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American Electric Power
Cook Nuclear Plant
One Cook Place
Bridgman, MI 49106
616 465 5901



May 25, 1998

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

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:

98-025-00

Sincerely,

A handwritten signature in cursive script, appearing to read "J. R. Sampson", is written over the typed name.

J. R. Sampson
Site Vice President

/mbd

Attachment

c: C. J. Paperiello (Acting), Region III
J. R. Sampson
P. A. Barrett
S. J. Brewer
R. Whale
D. Hahn
Records Center, INPO
NRC Resident Inspector

IE 221

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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 INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 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.

FACILITY NAME (1)
Donald C. Cook Nuclear Plant - Unit 1DOCKET NUMBER (2)
50-315

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TITLE (4)

Technical Specification Surveillance Requirements Not Met Due to Lack of Attention to Detail While Revising Procedures

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
04	24	98	98	-- 025 --	00	05	26	98	Cook - Unit 2	50-316
									FACILITY NAME	DOCKET NUMBER
			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
OPERATING MODE (9) 5			20.2201(b)			20.2203(a)(3)(i)			50.73(a)(2)(iii) 73.71(b)	
POWER LEVEL (10) 0			20.2203(a)(1)			20.2203(a)(3)(ii)			50.73(a)(2)(iv) 73.71e	
			20.2203(a)(2)(i)			20.2203(a)(4)			50.73(a)(2)(v) OTHER	
			20.2203(a)(2)(ii)			50.36(c)(1)			50.73(a)(2)(vii) (Specify in Abstract below and in Text, NRC Form 366A)	
			20.2203(a)(2)(iii)			50.36(c)(2)			50.73(a)(2)(viii)(A)	
			20.2203(a)(2)(iv)			50.73(a)(2)(i)			50.73(a)(2)(viii)(B)	
			20.2203(a)(2)(v)			50.73(a)(2)(ii)			50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Mr. Paul Schoepf, Safety Related Mechanical Engineering Superintendent	616/465-5901, x2408

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs

SUPPLEMENTAL REPORT EXPECTED (14)

YES (if yes, complete EXPECTED SUBMISSION DATE).	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	X				

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

On April 24, 1998, with both Unit 1 and Unit 2 in Mode 5, plant personnel determined that the surveillance requirements of Technical Specification (T/S) 4.6.5.1.b.3 were not being met. This T/S requires that visual inspections of the ice condenser ice beds be performed to verify that the flow passages, top deck floor grating, intermediate deck and lattice frames are free of frost and ice. The surveillance as currently performed inspects only the flow passages and lattice frames, and does not direct the inspection of the intermediate deck or the top deck floor grating. The requirements to inspect the intermediate deck and top deck were omitted when the surveillance procedure was revised in 1990 for incorporation of T/S Amendments 125/138. This was determined to be reportable in accordance with 10CFR50.73(a)(2)(i)(B), for any operation or condition prohibited by the plant's Technical Specification. This LER is therefore submitted in accordance with those requirements.

The root cause of this condition is the lack of attention to detail, which resulted in the failure to accurately transfer the surveillance requirements contained in the T/S to the procedures used to perform the inspections. The basis for the ice condenser surveillance program is being reconstituted, and the ice condenser surveillance procedures revised to ensure compliance with the T/S requirements. A comprehensive assessment of the overall surveillance program is being performed as part of the Restart Plan.

Although inspection of the intermediate deck and top deck floor grating is not specifically required by the surveillance procedures, these areas are located adjacent to areas that are regularly inspected. Indications of ice buildup would have likely been discovered during the performance of the existing surveillances. The safety significance of this condition is therefore considered to be minimal.

LICENSEE EVENT CONTINUATION

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.

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Cook Nuclear Plant - Unit 1	50-315	YEAR	SEQUENTIAL	REVISION	2 OF 3
		98	-- 025 --	00	

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

Conditions Prior to Event

Unit 1 was in Mode 5, Cold Shutdown

Unit 2 was in Mode 5, Cold Shutdown

Description of Event

On April 24, 1998, while investigating the condition documented in LER 315/98-007-01 on ice basket weights, plant personnel determined that the existing surveillance procedure, **12 THP 4030.STP.250, used to verify compliance with Technical Specification (T/S) 4.6.5.1.b.3 was inadequate. This T/S requires, in part, that at least once per 18 months:

- 4.6.5.1.b.3 Verifying, by a visual inspection of at least two flow passages per ice condenser bay, that the accumulation of frost or ice on the top deck floor grating, on the intermediate deck and on flow passages between ice baskets and past lattice frames is restricted to a nominal thickness of 3/8 inches.

It was determined that the existing surveillance procedure only inspects the flow passages between the ice baskets and past the lattice frames. It does not direct the inspection of the intermediate deck or the top deck floor grating.

The investigation of this condition revealed that until the issuance of T/S Amendments 125/138 in May, 1990, all requirements of T/S 4.6.5.1.b.3 were met by the then existing procedure. With the issuance of the amendments, **12 EHP 4030.STP.250 was revised. Revision 1 of the procedure became effective in October, 1990, but contained only the requirements to visually inspect at least two flow passages per bay, and to inspect the lower plenum support structures and turning vanes. The requirement to inspect the top deck floor grating was moved to **12 EHP 4030.STP.244, but no acceptance requirement was stipulated. **12 EHP 4030.STP.245 mentions the intermediate deck as well, however, it does not state that it is to be inspected for ice buildup.

Cause of Event

The root cause of this condition is the lack of attention to detail, which resulted in the failure to accurately transfer the surveillance requirements contained in the T/S to the procedures used to perform the inspections. This occurred during the revision of the surveillance procedures that was initiated by the issuance of T/S Amendments 125/138 in 1990.

Analysis of the Event

This condition is reported in accordance with the provisions of 10CFR50.73(a)(2)(i)(B), for any operation or condition prohibited by the plant's Technical Specification. This LER is therefore submitted in accordance with those requirements.

Although inspection of the intermediate deck and top deck floor grating is not specifically required by the surveillance procedures, these areas are located adjacent to areas that are regularly inspected. Indications of ice buildup would be likely to be discovered during the performance of the existing surveillances. Procedures **12 EHP 4030.STP.250, for the flow passage inspections, and **12 EHP 4030.STP.245, for the intermediate deck doors, are performed on an 18 month interval. The surveillance procedures are normally performed twice per outage, once at the beginning to document the as-found condition, and then at the end to document the as-left condition. Procedure **12 EHP 4030.STP.245, for inspection of the top deck doors, is performed on a quarterly basis. These inspection intervals meet or exceed that required by the T/S for the inspection of the intermediate and top deck doors, even though the inspections directed by these procedures did not contain adequate guidance and acceptance criteria to ensure compliance with the T/S requirement.

LICENSEE EVENT CONTINUATION

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

Analysis of the Event (cont'd)

It has therefore been concluded that although the procedures did not explicitly require inspection of the intermediate and top deck doors for frost and ice build-up, nor provide acceptance criteria, the safety significance of this condition is minimal.

Corrective Action

The basis of the ice condenser surveillance program, including the licensing correspondence, will be reconstituted. The ice condenser surveillance procedures are being revised to ensure that the T/S surveillance requirements are met for future surveillances.

After ice bed maintenance is complete, an inspection of the flow passages through the intermediate deck and the top deck grating will be performed. These actions will be completed prior to restart of either unit.

A comprehensive assessment of the entire surveillance program is being performed as part of the Restart Plan. This assessment will be completed prior to restart of either unit. Specific actions that arise from this assessment will be communicated to the NRC during the restart process.

Multiple conditions have been identified relative to the ice condenser, and investigations performed for each of them. The investigation results have overlapped in the corrective and preventive actions area, and the surveillance problem documented here has corrective/preventive actions which are common to several of the identified conditions. The actions that will be taken as a result of these investigations will likewise be communicated to the NRC during the restart process.

Failed Component Identification

Not Applicable

Previous Similar Events

None