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cc: Baker

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JOHN E. DOLAN
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May 22, 1978
AEP:NRC:00002

Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316
License No. DPR-74

Mr. J. G. Keppler, Regional Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

By letter dated May 16, 1978, we provided a written followup report concerning the lockout of the Containment Spray Pump switches on Unit No. 2 while entering Mode 4. Because of an oversight on the part of our staff, three errors, of a minor typographical nature, were included in that report.

Attached please find corrected pages 1, 2 and 4 for use as replacement pages in that report. Revision bars in the right hand margin indicate these corrections.

Very truly yours,

John E. Dolan
John E. Dolan

JED:em
Enclosure

- cc: R. C. Callen
- G. Charnoff
- P. W. Steketee
- R. J. Vollen
- R. Walsh
- R. W. Jurgensen
- D. V. Shaller-Bridgman

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ENCLOSURE

This report provides a complete explanation of the circumstances surrounding this event.

a) Description Of The Event:

In Cold Shutdown (Mode 5) the normal position of Containment Spray System (CTS) Pump Switches is in the "Pull to Lockout" position. This is done to prevent inadvertent actuation of the CTS while in Mode 5 or 6.

While returning Unit 2 into operation after a planned outage, at 0431 hours on May 2, 1978, the Unit progressed from Mode 5 to Mode 4 (Hot Shutdown). When Mode 4 was entered the switches for the Containment Spray Pumps had not been moved from the "Pull to Lockout" position which prevents the pumps from starting, to the "Neutral" (Automatic Standby) position which permits the pumps to start automatically on demand. This action was in violation of Appendix "A" Technical Specification 3.6.2.1 which requires "Two independent containment spray systems shall be operable with each spray system capable of taking suction from the RWST and transferring suction to the containment sump." This specification is applicable to Modes 1, 2, 3, and 4.

b) Cause Of The Event:

The primary cause of this event was a procedural inadequacy with a secondary cause being personnel error.

Operating Procedure 2-OHP-4021.001.001 Revision 0 "Plant Heatup from Cold Shutdown to Hot Standby" was being used to control the heatup. The Operating Procedure was ambiguous and deficient. The procedure did not include a specific signoff that all the requirements for entering Mode 4 are completed. Procedure step 6.11.2 states "Verify completion of Checkoff Sheet 5.2." Checkoff Sheet 5.2 is a listing of all the required surveillance testing that must be current or completed prior to entering Mode 4. This listing did not require that the CTS pump switches be placed in the automatic standby position.

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b) Continued

Procedure step 6.17 states "Align the safeguards system for standby readiness by completing the valve lineup sheet for 2-OHP-4021.008.002 (ECCS) and 2-OHP-4021.009.001 (CTS)." Again, completing the valve lineup sheets would not have assured the pump switches were placed in the automatic standby condition. Combining the requirements for the entire Emergency Core Cooling (ECCS), which is not required until just prior to entering Mode 3, and the CTS, which is required prior to entering Mode 4, was confusing to the Operator.

The Unit Supervisor (US) in charge of Unit 2 Control Room and the Shift Operating Engineer (SOE) who is the shift supervisor did not comply with Technical Specification 3.6.2.1 prior to entering Mode 4. Both of them were aware of the Containment Spray System (CTS) pump switches being in the "Pull to Lockout" position. The US was aware that the required surveillance testing to assure Operable CTS pumps had been conducted and that if an accident should have occurred he could have placed the pumps switches in the required position and the pumps would have started as required. The US and the SOE mistakenly thought that the CTS pumps were not required until later in the heatup.

c) Corrective Action Taken At Time Event Was Discovered:

The event was discovered at 0800 by the next shift who had just assumed responsibility. The SOE was immediately informed and the heatup was stopped. RCS temperature was maintained between 310°F and 330°F. The ACTION statement of the Technical Specification 3.6.2.1 states: "With one containment spray system inoperable, restore the inoperable spray system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the inoperable spray system to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours.

With the Operators knowing they were in excess of specification 3.6.2.1 they then applied Technical Specification 3.0.3 which states: "In the event a Limiting Condition for Operation and/or associated ACTION requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the facility shall be placed in at least HOT STANDBY within 1 hour and in COLD SHUTDOWN within the following 30 hours unless corrective measures are completed that permit operation under the permissible ACTION statements for the specified time interval as measured from initial discovery. Exceptions to these requirements shall be stated in the individual specifications."

As a result of the above analyses, it is concluded that the event cited herein would not have resulted in a situation which could have adversely affected the health and safety of the public.

e) Corrective Action Taken To Prevent Recurrence

1) Disciplinary action has been taken against the Unit Supervisor and Shift Operating Engineer who permitted the plant to enter Mode 4 in violation of the Technical Specification.

2) Operating Procedure 2-OHP-4021.001.001 is being revised to incorporate the required temporary change sheets to make it easier for the Operator to follow and further reduce the likelihood of recurrence.

In addition, for the charging, safety injection, RHR and containment spray systems, the procedure revision will include the requirement that immediately prior to entering an operational mode for which these systems must be operable, a check will be made of the Status Lights and Annunciator Panels in the Control Room to assure that the required valves and switches are indicated as being in the correct position.

3) Operating Procedures in the 2-OHP-4021.001.XXX series are overall plant coordinating procedures to control heatup, cool down and power operation. These procedures are used for sequencing when individual system procedures are to be completed. These procedures will be reviewed and revised as necessary to correct any deficiencies and to remove ambiguity.

f) Date of Full Compliance:

Operating Procedure 2-OHP-4021.001.001 will be revised prior to June 15, 1978.

The review and revision, if required, of the 2-OHP-4021.001.XXX series procedures will be completed by July 15, 1978.

g) A completed copy of the Licensee Event Report is attached below.