

PORT - PREVIOUS REPORT DA
LICENSEE EVENT REPORT

(PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

REPORT SOURCE 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30
DOCKET NUMBER 68 69 70 71 72 73 74 75 76 77 78 79 80
EVENT DATE
REPORT DATE

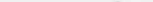
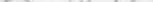


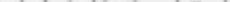


1 DURING STABILIZATION PERIOD PRIOR TO STARTING 24 HOUR ILRT TYPE "A" TEST, THREE

0 2 DURING STABILIZATION PERIOD PRIOR TO STARTING 24 HOUR ILRT TYPE "A" TEST, THREE

0 3 CONTAINMENT ISOLATION VALVES WERE IDENTIFIED TO BE LEAKING AND REPAIRED. THE NRC

INSPECTOR INTERPRETED THIS TO BE CONTRARY TO 10 CFR-50 APPENDIX J. THE LEAKS FROM

05 THESE VALVES SHOULD HAVE BEEN QUANTIFIED BEFORE REPAIRS, AS PER THE NRC INSPECTOR.

(17) **LER/RO**
REPORT
NUMBER

EVENT YEAR
 8 1
 21 22

RE-ORT NO.
 0 2 7
 24 26

/
 27

CODE
 0 3
 28 29

TYPE
 X
 30

-
 31

NO.
 1
 32

| ACTION TAKEN | | FUTURE ACTION | | EFFECT ON PLANT | SHUTDOWN METHOD | HOURS | ATTACHMENT SUBMITTED | NPRD-4 FORM SUB. | PRIME COMP. SUPPLIER | COMPONENT MANUFACTURER | | | | | | | | | | | |
|--------------|----|---------------|----|-----------------|-----------------|-------|----------------------|------------------|----------------------|------------------------|----|---|----|---|----|---|----|---|----|---|----|
| G | 18 | X | 19 | Z | 20 | 000 | 22 | Y | 23 | N | 24 | Z | 25 | Z | 26 | 9 | 27 | 9 | 28 | 9 | 29 |

SEE ATTACHED AEP: NRC: 0615, RESPONSE TO IE INSPECTION 50-315/81-15.

1 0 SEE ATTACHED AEP: NRC: 0615, RESPONSE TO IE INSPECTION 50-315/81-15.

| | | |
|---|---|--|
| 1 | 1 | |
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1 2 _____

| | | |
|---|---|--|
| 1 | 3 | |
|---|---|--|

14

8 9 FACILITY STATUS (28) % POWER (29) OTHER STATUS (30) METHOD OF DISCOVERY (31) DISCOVERY DESCRIPTION (32)

1 5 H 0 0 0 NA B SURVEILLANCE TEST

7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60

ACTIVITY CONTENT
RELEASED OF RELEASE

1 6 3 33 10 11 NA 44

AMOUNT OF ACTIVITY (35)

LOCATION OF RELEASE (36)

NA 45 80

PERSONNEL EXPOSURES

| NUMBER | | TYPE | | DESCRIPTION |
|--------|---|------|---|-------------|
| 1 | 7 | 0 | 0 | NA |

| PERSONNEL INJURIES | | NUMBER | | DESCRIPTION | |
|--------------------|---|--------|---|-------------|----|
| 1 | 1 | 0 | 0 | 0 | NA |

| | | LOSS OF OR DAMAGE TO FACILITY | | |
|---|---|-------------------------------|-------------|------|
| | | TYPE | DESCRIPTION | |
| 1 | 2 | L | (42) NA | (43) |

PUBLICITY
 ISSUED DESCRIPTION (45) NA
 (2) (0) (N) (44)

NRC USE ONLY

SUPPLEMENT TO CAUSE DESCRIPTION

ATTACHMENT TO AEP:NRC.0615

The Unit 1 Containment Integrated Leak Rate Test (CILRT) was performed during July, 1981 as per Plant Procedure **12 THP 4030 STP.202. This procedure was developed in accordance with Appendix J to 10 CFR 50, dated February 14, 1973.

Following pressurization, routine inspection of the valve lineups outside the containment building was performed. During this inspection, three leakage paths were identified and repaired as noted in the IE Inspection Report. There was no attempt to measure the leakage on these three leakage paths as the engineers responsible for the CILRT believed that the requirement noted in 10 CFR 50, Appendix J, Section III.A.1 (a) did not apply during this period. It was believed that this requirement applied only after the start of the stabilization period and prior to the actual overall leak rate measurements. The interpretation of the appropriate sections of Appendix J at the time of the test and its specification in the testing procedure was that the "official" start of the test was the beginning of the stabilization period rather than after containment inspection. This interpretation is supported by the fact that in the test procedure all valve lineups, instrument and tank venting operations, system draining, test instrument setup, etc. as well as the containment inspection and containment pressurization were listed as part of the "Initial Conditions" that had to be completed prior to carrying out the procedure. As the test procedure had been utilized and approved in four previous CILRTs at the Cook Plant site, it was considered acceptable by the engineers responsible for the test. As such, it was believed by these test personnel that it was acceptable to make 'equipment repairs or adjustments' prior to beginning the Type A test while completing the required "Initial Conditions." This understanding was partly based on the interpretation of Appendix J, Section III.A.1 (b) which reads in part that "Repairs of malfunctioning or leaking valves shall be made as necessary."

In the future, to avoid confusion in the interpretation of 10 CFR 50, Appendix J, the CILRT procedure has been revised to specify that no repairs or adjustments are to be made once the containment inspection has commenced. The procedure also indicates that if during the period between the initiation of the containment inspection, through and including the performance of a Type A test, potentially excessive leakage paths are identified as stipulated in Appendix J, that the test shall be terminated and the leakage through these paths will be measured utilizing local leakage testing methods.

Indiana & Michigan Electric Company proposes to schedule subsequent Type A tests at the existing 40 ± 10 month intervals specified in Appendix J. We do not feel that a more frequent test schedule is warranted for the

ATTACHMENT T/J LER# 81-027/3X-1

SUPPLEMENT TO CAUSE DESCRIPTION

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following reasons. First, this was the only single periodic test of the three CILRTs performed on Unit 1 which could possibly be considered a failure; second, there is some possibility that the acceptance criteria would have been met if the adjustments had not been made; and, third, the final measured leakage rate was less than the maximum allowable by 10 CFR 50, Appendix J. We therefore propose to conduct the fourth CILRT on Unit 1 during the 1985 Refueling Outage within the 10 year Plant In-Service Inspection Program.