

Nebraska Public Power District

COOPER NUCLEAR STATION
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321
TELEPHONE (402) 825-3811

NLS95C036

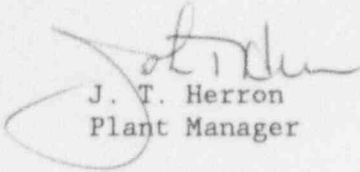
January 26, 1995

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Dear Sir:

Cooper Nuclear Station Licensee Event Report 94-032 is forwarded as an attachment to this letter.

Sincerely,


J. T. Herron
Plant Manager

/nr

Attachment

cc: L. J. Callan
G. R. Horn
J. H. Mueller
R. G. Jones
R. A. Sessoms
K. C. Walden
INPO Records Center
NRC Resident Inspector
R. J. Singer
CNS Training
CNS Quality Assurance
R. L. Koch

7502020165 950126
PDR ADOCK 05000298
S PDR

IF22
11

LICENSEE EVENT REPORT (LER)

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

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.

FACILITY NAME (1)

COOPER NUCLEAR STATION

DOCKET NUMBER (2)

05000298

PAGE (3)

1 OF 3

TITLE (4)

Weakness in ASME Section XI IST program due to discrepancies in component boundary selection criteria.

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
12	21	94	94	--032--	00	01	26	95	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		0	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)		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)		Voluntary	
			20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)			

LICENSEE CONTACT FOR THIS LER (12)

NAME Alan J. Horn Staff Support Engineer, Nuclear Licensing and Safety
TELEPHONE NUMBER (Include Area Code) (402) 825-3811

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
N/A	N/A	N/A	N/A	N/A					

SUPPLEMENTAL REPORT EXPECTED (14)

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

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

A review of the Cooper Nuclear Station (CNS) ASME Section XI Inservice Testing (IST) program identified several weaknesses in the program scope and in the test methods. These weaknesses were found by applying the guidance of (Draft) NUREG-1482. The cause was partly due to changes in the boundary classifications and partly due to inadequate program maintenance. Approximately 900 components were identified for potential reclassification and about 200 potential testing program weaknesses were identified for further investigation.

All components identified for reclassification were found to be qualifiable for pressure boundary; one component was found not to be qualified seismically.

Of the approximately 200 potential IST Program weaknesses, 22 require testing prior to startup.

This report is being made as a voluntary submittal to inform the NRC of IST program issues.

The cause of this condition is a Management/Quality Assurance Deficiency (NUREG-1022, Cause code E) due to past inadequacies in administrative and technical control of the IST program.

Corrective action includes a complete review using updated boundary selection criteria and updating of the ISI and IST programs as necessary.

. LICENSEE EVENT REPORT (LER)
TEXT 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.

FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)			PAGE (3)
COOPER NUCLEAR STATION		05000298		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
				94	-- 032 --	00	

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

Plant Status

The plant was in Cold Shutdown with the Reactor Coolant System temperature approximately 110 degrees Fahrenheit and the Residual Heat Removal system in the Shutdown Cooling mode of operation when the IST Program deficiencies were discovered.

Event Description

In response to NRC Inspection Report 93-17, Cooper Nuclear Station (CNS) committed to review all safety related non-code class 1, 2, and 3 systems for inclusion in the scope of the ASME Section XI Inservice Inspection (ISI) Program. This review identified a need to establish and document the basis for testing conducted in the IST program. Subsequent to this, the CNS Diagnostic Self Assessment Team identified weaknesses in the IST program. Based on these findings, an IST and Surveillance Testing Action Plan was included in the Phase I Performance Improvement Plan.

As a result of boundary reclassifications from the ISI Program evaluation, approximately 900 components were reclassified as safety related. Most of these components were instruments and instrument root valves that only had a passive pressure boundary function. However, several components were also added to the IST Program.

In addition, the IST Program evaluation identified several other components that were already in the IST Program, but were not being tested as required by the Code. Inaccuracies in IST relief requests were also identified.

The deficiencies identified by this comprehensive review were categorized as startup, second interval, or third interval issues. The components that were not previously in the IST Program, or were in the program but not properly tested, must be tested in accordance with ASME Code requirements prior to power operation.

Safety Significance

Of the approximately 900 component classification discrepancies identified, about half were found to have been purchased as safety related components and have been evaluated for seismic qualification. The other half are commercial grade items that have been dedicated for safety related use. All of these items were found to be qualifiable for pressure boundary applications. One component has been determined not to be seismically qualified and has been valved out of service (Reactor Equipment Cooling Surge Tank level glass).

Of the approximately 200 potential IST Program weaknesses, 22 require testing prior to startup. The balance were enhancements or requirements for the second (current) interval IST Program closeout, requirements for the third interval program, or determined not to be discrepancies and no further action required.

. LICENSEE EVENT REPORT (LER)
TEXT 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.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
COOPER NUCLEAR STATION	05000298	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 3
		94	-- 032 --	00	

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

Cause

The cause of this condition is a Management/Quality Assurance Deficiency due to past inadequacies in administrative and technical control of the IST Program. This cause was revealed by program reviews, recent staff changes, and by recent changes in industry guidance (NUREG-1482).

Corrective Action

As a result of the program reviews, additional components will be added to both the ISI and IST programs. Any new or revised tests that are required by the ASME Code to demonstrate operational readiness will be performed prior to startup from the current outage.

Any examinations required by the ASME Code to demonstrate structural integrity will be performed by the end of the current ten year interval.

In addition, the following future actions have been planned:

1. Enhancements for the second (current) interval IST Program will be resolved within three months after startup from the current outage.
2. Enhancements or requirements for the third interval IST Program will be resolved within six months after startup from the current outage.
3. Third interval ISI and IST Programs will be submitted six months prior to the end of the second (current) interval.

Similar Events

LER 93-026 (R1) Noncompliance with ASME Section XI inspection and test requirements associated with safety-related portions of the Service Water and Reactor Equipment Cooling Systems.

Correspondence No: NLS950036

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
Any new or revised tests that are required by the ASME Code to demonstrate operational readiness will be performed prior to startup from the current outage.	Prior to startup
Any examinations required by the ASME Code to demonstrate structural integrity will be performed by the end of the current ten year interval.	Prior to end of current ten year interval
Enhancements for the second (current) interval IST Program will be resolved within three months after startup from the current outage.	Three months after startup
Enhancements or requirements for the third interval IST Program will be resolved within six months after startup from the current outage.	Six months after startup
Third interval ISI and IST Programs will be submitted six months prior to the end of the second (current) interval.	Six months prior to end of the second (current) interval