



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS950062

February 27, 1995

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

Dear Sir:

Cooper Nuclear Station Licensee Event Report 95-003 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
R. L. Koch
INPO Records Center
NRC Resident Inspector
R. J. Singer
CNS Training
CNS Quality Assurance

070135

9503070348 950227
PDR ADOCK 05000298
S PDR

JE221

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 STATIONDOCKET NUMBER (2)
05000298PAGE (3)
1 OF 3

TITLE (4) Missed Annual Cycling Surveillance of Fire Protection Valves

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
01	28	95	95	-- 003 --	00	02	27	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)	000	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
Art Alford, Senior Staff Nuclear Licensing & Safety Eng.
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

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)

The Surveillance Testing Validation Program identified that fire protection valves FP-V-569 and FP-V-571 were inadvertently dropped from the 6.4.5.2 series of annual fire protection surveillance procedures in November, 1990, when the procedures were being revised. Technical Specification 4.15.A.3 requires each testable valve in the flow path of the fire suppression water supply system to be demonstrated operable every twelve months by cycling the valve. These valves were not listed in the annual cycling surveillance procedures after the November, 1990, procedure revisions and therefore were not demonstrated operable every twelve months as required by Technical Specifications.

Per NUREG-1022, the cause of this event is Defective Procedure, (cause code D). Specifically the procedure change process in 1990 failed to adequately define the requirements for verification and validation of procedure scope and methods.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
COOPER NUCLEAR STATION	05000298	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		95	-- 003 --	00	

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

Plant Status

The plant was in cold shutdown at the time of discovery of the event.

Event Description

The Surveillance Testing Validation Program identified that fire protection valves FP-V-569 and FP-V-571 were inadvertently dropped from the 6.4.5.2 series of annual fire protection surveillance procedures in November, 1990, when the procedures were being revised. Technical Specification 4.15.A.3 requires each testable valve in the flow path of the fire suppression water supply system to be demonstrated operable every twelve months by cycling the valve. These valves were not listed in the annual cycling surveillance procedures after the November, 1990, procedure revisions and therefore were not demonstrated operable every twelve months as required by Technical Specifications.

A search of Cooper Nuclear Station (CNS) surveillance procedures for the above two valves resulted in the following:

- 1) Surveillance Procedure (SP) 6.4.5.1 performs a monthly visual inspection of valves FP-V-569 and FP-V-571. This inspection consists of checking the valves normal position and ensuring that the seal is intact.
- 2) SP 6.4.5.18 performs a flow test of hydrants and associated underground piping in the fire protection system every three years. FP-V-569 is cycled by this procedure.

The valves are not cycled in any other CNS annual fire protection surveillance procedure. Therefore, the valves were not demonstrated operable every 12 months as required by Technical Specification 4.15.A.3.

In Revision 41 of SP 6.4.5.2, valves FP-V-569 and FP-V-571 were specified and cycled annually. However, when SP 6.4.5.2 was cancelled and subsequently issued as twelve separate procedures, valves FP-V-569 and FP-V-571 were inadvertently dropped from these procedures. This omission went unnoticed for approximately 5 years.

Cause

The CNS Procedure Change Process existing in November, 1990, did not adequately address technical review of complex procedure changes in that verification and validation was not required. No specific guidance was given for review of complex changes.

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

Safety Significance

FP-V-569 and FP-V-571 were declared inoperable because they were not annually cycled as required by Technical Specification 4.15.A.3. The valves are normally open, manually actuated, sealed valves which function to isolate the fire main in the event of a line break. Thus, an operable flow path through the fire water suppression system existed. An operability determination was performed which documented that even with these two valves inoperable, the operability of the fire suppression system was assured through the use of available compensatory measures. Therefore, the safety significance is minimal.

Corrective Action

A temporary procedure change was initiated immediately to SP 6.4.5.2.9, that specified cycling valves FP-V-569 and FP-V-571. The valves were subsequently cycled and verified to be operable on January 28, 1995.

A Surveillance Testing Validation program is being performed and is scheduled to be completed by June 1, 1995. The purpose of this program is to review the surveillance testing requirements for each CNS system with Technical Specification criteria. The twelve surveillance procedures of concern (SP 6.4.5.2.1 through 6.4.5.2.12) were reviewed by this project.

The procedure change process will be enhanced to provide a well defined verification and validation process.

The importance of adequate verification and validation of procedures will be communicated to appropriate responsible supervisors and appropriate technical staff personnel until the new procedure change process is in place.

Similar Events

LER 95-001, Surveillance Testing of Detection System Supervisory Circuits

Correspondence No: NLS950062

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
A Surveillance Testing Validation program to review the surveillance testing requirements for each CNS system with Technical Specification criteria is being performed.	6/1/95
The procedure change process will be enhanced to provide a well defined verification and validation process.	N/A
The importance of adequate verification and validation of procedures will be communicated to appropriate responsible supervisors and appropriate technical staff personnel until the new procedure change process is in place.	N/A