U.S. NUCLEAR REGULATORY COMMISSION NRC 5prm 366 APPROVED ONE NO 1150-0104 EXPIRES 8/31/85 LICENSEE EVENT REPORT (LER) DOCKET NUMBER (2) D. C. COOK UNIT 2 1 OF 013 0 15 10 10 10 13 11 16 DISCOVERY OF INSTALLED EQUIPMENT NOT MEETING E.Q. REQUIREMENTS OTHER FACILITIES INVOLVED (8) LER NUMBER (6) REPORT DATE (7) SEQUENTIAL DOCKET NUMBERIS MONTH MONTH DAY YEAR YEAR 0 | 5 | 0 | 0 | 0 2 5 8 5 8 5 0014 0 0 0 2 2 6 0 | 5 | 0 | 0 | 0 | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR \$. (Check one or more of the following) (11) OPERATING MODE (9) 1 20.402(b) 50 73(a)(2)(iv) 20.405(c) 20.406(a)(1)(i) 50.38(c)(1) 50.73(a)(2)(v) 73.71(e) POWER X OTHER (Specify in Abstract below and in Text, NRC Form 366A) 20.406(a)(1)(ii) 50.73(a)(2)(vii) 01917 50.36(c)(2) 20.406(a)(1)(iii) 50.73(a)(2)(i) 50 73(a)(2)(viii)(A) 20.405(a)(1)(iv) 50 73(a)(2)(viii)(8) 50.73(a)(2)(ii) 20 406(a)(1)(v) 50.73(a)(2)(iii) 50 73(a)(2)(v) LICENSEE CONTACT FOR THIS LER (12) TELEPHONE NUMBER NAME AREA CODE A. A. BLIND TECHNICAL ENGINEERING DEPARTMENT SUPERINTENDENT 6,1,6 4 6 5 - 5 9 0 1 COMPLETE ONE LINE FOR EACH CONTENT FAILURE DESCRIBED IN THIS REPORT (13) MANUFAC MANUFAC CAUSE SYSTEM COMPONENT COMPONENT CAUSE SYSTEM TO NPROS TO NPROS

ABSTRACT (Limit to 1400 spaces i.e. approximately fifteen single-space typewritten lines) (16)

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SUPPLEMENTAL REPORT EXPECTED (14)

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THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§50.49.

ON JANUARY 25, 1985, AT 1510 HOURS, WITH UNIT 2 AT 97 PERCENT RTP, THE PLANT WAS ADVISED THAT CONTINUED ENVIRONMENTAL QUALIFICATION RESEARCH BY THE SERVICE CORPORATION RESULTED IN THE DETERMINATION THAT THE CONNECTION ON THE RTD MONITORING REACTOR COOLANT SYSTEM (RCS) LOOP 2 COLD LEG TEMPERATURE WAS NOT ENVIRONMENTALLY QUALIFIED.

THE RTD IN QUESTION, MANUFACTURED BY THE RDF CORPORATION, WAS INSTALLED ON NOVEMBER 20, 1984, AS A REPLACEMENT FOR THE THEN-INSTALLED RTD WHICH WAS OF ROSEMOUNT MANUFACTURE. RESEARCH INDICATES THAT THIS IS THE ONLY ACTIVE INSTALLATION OF A RDF MANUFACTURED RTD BEING UTILIZED FOR RCS TEMPERATURE MONITORING IN UNIT 2.

AT 0925 HOURS ON JANUARY 26, 1985, A UNIT 2 TRIP OCCURRED DUE TO AN UNRELATED COMPONENT FAILURE. BEFORE THE UNIT WAS RESTARTED, THE UNQUALIFIED RTD WAS REMOVED FROM SERVICE AND REPLACED WITH AN ENVIRONMENTALLY QUALIFIED SPARE (MANUFACTURED BY ROSEMOUNT).

DESIGN CHANGE RFC-DC-12-2839 WHICH PROVIDES INSTRUCTIONS NECESSARY TO UPGRADE INSTALLED RDF MANUFACTURED RTD'S TO MEET ENVIRONMENTAL QUALIFICATIONS HAS BEEN APPROVED. THIS DESIGN CHANGE WILL BE IMPLEMENTED ON THE UNIT 2 INSTALLED RDF RTD AT THE NEXT OPPORTUNITY.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104

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

ON JANUARY 25, 1985, AT 1510 HOURS, WITH UNIT 2 AT 97 PERCENT RTP, THE PLANT WAS ADVISED THAT CONTINUED ENVIRONMENTAL QUALIFICATION RESEARCH BY THE SERVICE CORPORATION RESULTED IN THE DETERMINATION THAT THE CONNECTION ON THE RTD MONITORING REACTOR COOLANT SYSTEM (RCS) LOOP 2 COLD LEG TEMPERATURE WAS NOT ENVIRONMENTALLY QUALIFIED.

THE RTD IN QUESTION, MANUFACTURED BY THE RDF CORPORATION, WAS INSTALLED ON NOVEMBER 20, 1984, AS A REPLACEMENT FOR THE THEN-INSTALLED RTD WHICH WAS OF ROSEMOUNT MANUFACTURE. RESEARCH INDICATES THAT THIS IS THE ONLY ACTIVE INSTALLATION OF A RDF MANUFACTURED RTD BEING UTILIZED FOR RCS TEMPERATURE MONITORING IN UNIT 2.

THE INITIAL OPINION ON THIS SITUATION WAS THAT THE LACK OF ENVIRONMENTAL QUALIFICATION FOR THIS RTD CONNECTION RENDERED THE COMPONENT INOPERABLE, THEREBY REQUIRING THE ASSOCIATED REACTOR PROTECTION BISTABLES TO BE PLACED IN THE TRIPPED CONDITION WITHIN ONE HOUR (PER TECH. SPEC. 3.3.2.2, TABLE 3.3-1, ACTION STATEMENT 2).

DUE TO THE SEVERE WEATHER CONDITIONS EXISTING AT THAT TIME, PLANT MANAGEMENT REQUESTED A REVIEW OF THIS DETERMINATION, INCLUDING THE NECESSITY TO TRIP THE ASSOCIATED BISTABLES AND EXPOSE THE PLANT TO THE POTENTIAL OF A SPURIOUS TRIP, BE MADE WITH THE NRC. CONTACT WITH THE NRC (NRR) WAS MADE BY SERVICE CORPORATION PERSONNEL WHILE THE PLANT IN PARALLEL CONTACTED THE NRC REGIONAL PERSONNEL VIA THE NRC RESIDENT INSPECTOR. THE ORIGINAL INTENT OF THESE CONTACTS, FROM THE PLANT'S PERSPECTIVE, WAS TO SEEK RELIEF FROM THE TECH. SPEC. ACTION STATEMENT, SHOULD THE RTD IN FACT BE CONSIDERED INOPERABLE, UNTIL THE BRUNT OF THE ADVERSE WEATHER HAD PASSED. THIS APPROACH WAS CONSIDERED TO BE PREFERRED OVER INCREASING THE POTENTIAL FOR A SPURIOUS TRIP, GIVEN THE EXISTING CONDITIONS.

THE REFERENCED DISCUSSIONS WERE STILL IN PROGRESS AT 1600 HOURS ON JANUARY 25TH. THERE WAS AGREEMENT AMONG SEPARATE PAPTIES THAT THE DISCOVERY OF LACK OF ENVIRONMENTAL QUALIFICATION OF THE RTD CONNECTION, ALTHOUGH A NONCOMPLIANCE WITH 10 CFR 50.49 AND THEREFORE A REPORTABLE EVENT, DID NOT OF ITSELF RENDER THE RTD INOPERABLE; HOWE'ZER, CLOSURE HAD NOT BEEN REACHED ON THE SUBJECT. AT 1600 HOURS, THE PLANT INSTRUMENT SECTION WAS INSTRUCTED TO PLACE THE ASSOCIATED BISTABLES IN TRIP PENDING COMPLETION OF RELATED DISCUSSIONS.

THE ASSOCIATED BISTABLES WERE NOT TRIPPED BY 1610 HOURS, JANUARY 25TH DUE TO WORK AND INSTRUCTIONS NECESSARY TO PREPARE FOR THIS ACTION. SHORTLY AFTER 1610 HOURS, THE PLANT WAS NOTIFIED OF AGREEMENT ON THE POINT THAT THE RTD WAS NOT RENDERED INOPERABLE DUE SOLELY TO THE DISCOVERY OF LACK OF ENVIRONMENTAL QUALIFICATION. HAD THIS DETERMINATION NOT BEEN MADE, THE PLANT WOULD HAVE BEEN IN VIOLATION OF TECH. SPEC. 3.3.2.2, TABLE 3.3-1, ACTION STATEMENT 2 FOR APPROXIMATELY 10 MINUTES (UNTIL THE ACTION TO PLACE THE ASSOCIATED BISTABLES IN THE TRIPPED CONDITION WAS COMPLETED).

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/85

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AT 0925 HOURS ON JANUARY 26, 1985, A UNIT 2 TRIP OCCURRED DUE TO AN UNRELATED COMPONENT FAILURE. BEFORE THE UNIT WAS RESTARTED, THE UNQUALIFIED RTD WAS REMOVED FROM SERVICE AND REPLACED WITH AN ENVIRONMENTALLY QUALIFIED SPARE (MANUFACTURED BY ROSEMOUNT).

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Power INDIANA & MICHIGAN ELECTRIC COMPANY

DONALD C. COOK NUCLEAR PLANT
P.O. Box 458, Bridgman, Michigan 49106
(616) 465-5901

United States Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

Operating License DPR-74 Docket No. 50-316

Document Control Manager:

In accordance with the criteria established by 10CFR50.73 entitled Licensee Event Reporting System, the following report/s are being submitted:

RO 85-004-0

Sincerely,

W.G. Smith, Jr. Plant Manager

/cbm

Attachment

cc: John E. Dolan
J.G. Keppler, RO:III
M.P. Alexich
R.F. Kroeger
H. Brugger
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