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Cook Nuclear Plant  
One Cook Place  
Bridgman, MI 49106  
AEP.com

August 2, 2006

AEP:NRC:2573-33  
10 CFR 50.73  
10 CFR 50.4

Docket No. 50-316

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Unit 2  
LICENSEE EVENT REPORT 316/2006-005-00  
FAILURE TO COMPLY WITH TECHNICAL SPECIFICATION  
SURVEILLANCE REQUIREMENT 3.6.1.1

In accordance with the criteria established by 10 CFR 50.73 entitled Licensee Event Report System, the following report is being submitted:

LER 316/2006-005-00: "Failure to Comply with Technical Specification Surveillance Requirement 3.6.1.1"

There are no commitments contained in this submittal.

Should you have any questions, please contact Ms. Susan D. Simpson, Regulatory Affairs Manager, at (269) 466-2428.

Sincerely,

Lawrence J. Weber  
Plant Manager

HLE/rdw

Attachment

IE22

c: J. L. Caldwell, NRC Region III  
K. D. Curry – AEP Ft. Wayne, w/o attachment  
J. T. King, MPSC – w/o attachment  
MDEQ – WHMD/RPMWS – w/o attachment  
NRC Resident Inspector  
P. S. Tam, NRC Washington DC

NRC Form 366 (6-2004)				U.S. NUCLEAR REGULATORY COMMISSION				APPROVED BY OMB: NO. 3150-0104  Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.				EXPIRES 6/30/2007			
<h2 style="margin: 0;">LICENSEE EVENT REPORT (LER)</h2> <p style="margin: 0;">(See reverse for required number of digits/characters for each block)</p>															
<b>1. FACILITY NAME</b> Donald C. Cook Nuclear Plant Unit 2						<b>2. DOCKET NUMBER</b> 05000-316			<b>3. PAGE</b> 1 of 3						
<b>4. TITLE</b> Failure to Comply with Technical Specification Surveillance Requirement 3.6.1.1															
<b>5. EVENT DATE</b>			<b>6. LER NUMBER</b>			<b>7. REPORT DATE</b>			<b>8. OTHER FACILITIES INVOLVED</b>						
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER					
04	10	2006	2006	-- 005 --	00	08	02	2006	FACILITY NAME	DOCKET NUMBER					
<b>9. OPERATING MODE</b>  Mode 6				<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)</b> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input type="checkbox"/> 20.2201(b)</div> <div style="width: 50%;"><input type="checkbox"/> 20.2203(a)(3)(i)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(i)(C)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(vii)</div> <div style="width: 50%;"><input type="checkbox"/> 20.2201(d)</div> <div style="width: 50%;"><input type="checkbox"/> 20.2203(a)(3)(ii)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(ii)(A)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(viii)(A)</div> <div style="width: 50%;"><input type="checkbox"/> 20.2203(a)(1)</div> <div style="width: 50%;"><input type="checkbox"/> 20.2203(a)(4)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(ii)(B)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(viii)(B)</div> <div style="width: 50%;"><input type="checkbox"/> 20.2203(a)(2)(i)</div> <div style="width: 50%;"><input type="checkbox"/> 50.36(c)(1)(i)(A)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(iii)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(ix)(A)</div> <div style="width: 50%;"><input type="checkbox"/> 20.2203(a)(2)(ii)</div> <div style="width: 50%;"><input type="checkbox"/> 50.36(c)(1)(ii)(A)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(iv)(A)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(x)</div> <div style="width: 50%;"><input type="checkbox"/> 20.2203(a)(2)(iii)</div> <div style="width: 50%;"><input type="checkbox"/> 50.36(c)(2)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(v)(A)</div> <div style="width: 50%;"><input type="checkbox"/> 73.71(a)(4)</div> <div style="width: 50%;"><input type="checkbox"/> 20.2203(a)(2)(iv)</div> <div style="width: 50%;"><input type="checkbox"/> 50.46(a)(3)(ii)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(v)(B)</div> <div style="width: 50%;"><input type="checkbox"/> 73.71(a)(5)</div> <div style="width: 50%;"><input type="checkbox"/> 20.2203(a)(2)(v)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(i)(A)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(v)(C)</div> <div style="width: 50%;"><input type="checkbox"/> OTHER</div> <div style="width: 50%;"><input checked="" type="checkbox"/> 20.2203(a)(2)(vi)</div> <div style="width: 50%;"><input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)</div> <div style="width: 50%;"><input type="checkbox"/> 50.73(a)(2)(v)(D)</div> </div>											
												Specify in Abstract below or in NRC Form 366A			
<b>12. LICENSEE CONTACT FOR THIS LER</b>															
<b>FACILITY NAME</b> Susan Simpson, Regulatory Affairs Manager								<b>TELEPHONE NUMBER (Include Area Code)</b> (269) 466-2428							
<b>13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT</b>															
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX						
<b>14. SUPPLEMENTAL REPORT EXPECTED</b>								<b>15. EXPECTED SUBMISSION DATE</b>		MONTH	DAY	YEAR			
YES (If Yes, complete EXPECTED SUBMISSION DATE).				X	NO										
<b>ABSTRACT</b> (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)															
<p>On April 10, 2006, 2-SI-189, ECCS Safety Valves Discharge Header To Pressurizer Relief Tank Containment Isolation Check Valve, had a required surveillance internal inspection performed on it that potentially affected the valve's leak tightness prior to performing the required as-found B&amp;C type leak rate test. This resulted in being unable to meet the Technical Specification Surveillance Requirement (SR) 3.6.1.1 to perform the as-found B&amp;C type leak rate test.</p> <p>The cause of performing the required surveillance internal inspection prior to a required as-found leak rate test was a weakened barrier in that the work activity instructions did not require verification of completion of the as-found leak rate test prior to beginning the internal inspection.</p> <p>Corrective Actions taken were performance of an acceptable as-left leak rate test following the internal inspection, and revising the valve's surveillance internal inspection work activity to verify completion of the as-found test prior to performing valve disassembly. Corrective Actions to be taken include revising all recurring work activities for Appendix J components that potentially affect a valve's leak tightness to require a verification of completion of the as-found B&amp;C type leak rate test prior to performing an activity.</p> <p>This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), due to being unable to meet SR 3.6.1.1.</p>															

## LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Donald C. Cook Nuclear Plant Unit #	0500031	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 of 3
		2006	- 005	-- 00	

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

**Conditions Prior to Event**

Unit 2 was in refueling outage U2C16, in Mode 6.

**Description of Event**

On April 10, 2006, 2-SI-189, ECCS Safety Valves Discharge Header To Pressurizer Relief Tank Containment Isolation Check Valve [ISV], had a required surveillance inspection performed on it that potentially affected the valve's leak tightness prior to performing the required as-found leak rate test. This resulted in being unable to meet the Technical Specification Surveillance Requirement (SR) 3.6.1.1 for Containment. SR 3.6.1.1 requires that leakage rate testing be performed in accordance with the Containment Leakage Rate Testing Program. Donald C. Cook Nuclear Plant's Containment Leakage Rate Testing Program specifies as-found testing prior to performing maintenance, repairs, or inspections that could reduce containment leakage integrity.

Valve 2-SI-189, ECCS Safety Valves Discharge Header To Pressurizer Relief Tank Containment Isolation Check Valve, was disassembled per Job Order Activity (JOA) R0267698-04 and an internal visual inspection performed per JOA R0267698-03 prior to performance of the required as-found type B&C leak rate test. The scheduling for these activities was correct and the appropriate logic ties were in the schedule.

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), due to being unable to meet SR 3.6.1.1. This event occurred, and was identified, on April 10, 2006. The non-compliance with the Appendix J program requirements was identified on April 12, 2006. The initial review for applicability to 10 CFR 50.73 reporting requirements determined that the event was not required to be reported. Subsequent review and discussion between the plant staff and the Nuclear Regulatory Commission determined, after the 60-day time frame had expired, that the event was required to be reported. Therefore, this Licensee Event Report (LER) is being submitted greater than 60 days after the event.

**Cause of Event**

The cause of performing the required surveillance internal inspection prior to a required as-found leak rate test was a weakened barrier in that the work activity instructions did not require verification of completion of the as-found leak rate test prior to beginning the internal inspection.

**Analysis of Event**

The valve disassembly activities performed on 2-SI-189 on April 10, 2006, were for a required surveillance internal inspection. There were no outstanding corrective maintenance activities for 2-SI-189 nor was the valve leakage integrity suspect. Additionally, 2-SI-189 is not on an extended surveillance frequency under the Appendix J program as other more restrictive surveillance requirements outside of the Appendix J program require this valve to be disassembled and inspected on a refueling outage frequency.

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

Prior to the valve disassembly activities performed on 2-SI-189 on April 10, 2006, the as-left B&C test performed during the previous Unit 2 refueling outage (October 19, 2004) was satisfactory. No maintenance was performed on 2-SI-189 between the satisfactory test on October 19, 2004 and April 10, 2006. Additionally, no flow is expected past this valve during the operating cycle and a review of station Condition Reports between October 2004 and April 2006 did not identify any instances where there was flow past this valve. Thus, it can be concluded that the valve remained in the closed seated position from the satisfactory October 2004 as-left B&C test throughout the last operating cycle.

2-SI-189 is a containment isolation check valve that provides a one-way flow path from Residual Heat Removal [BP] safety valve 2-SV-104W [RV] to the Pressurizer Relief Tank [TK]. Failure of this valve does not contribute to core damage frequency, and additional component failures would be required for the failure to contribute to large early release frequency, which would still be well below 1.0 E-8. Therefore, this event was not risk significant.

**Corrective Actions**

Corrective Actions taken were performance of an acceptable as-left leak rate test following internal inspection of 2-SI-189, and revising the surveillance internal inspection work activity for 2-SI-189 to verify completion of the as-found test prior to performing valve disassembly.

Corrective Actions to be taken include revising all recurring work activities for Appendix J components that potentially affect a valve's leak tightness to require a verification of completion of the as-found B&C type leak rate test prior to performing an activity.

**Previous Similar Events**

A review was conducted of station Condition Reports and LERs for the previous 3 years. No similar events were identified.