

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

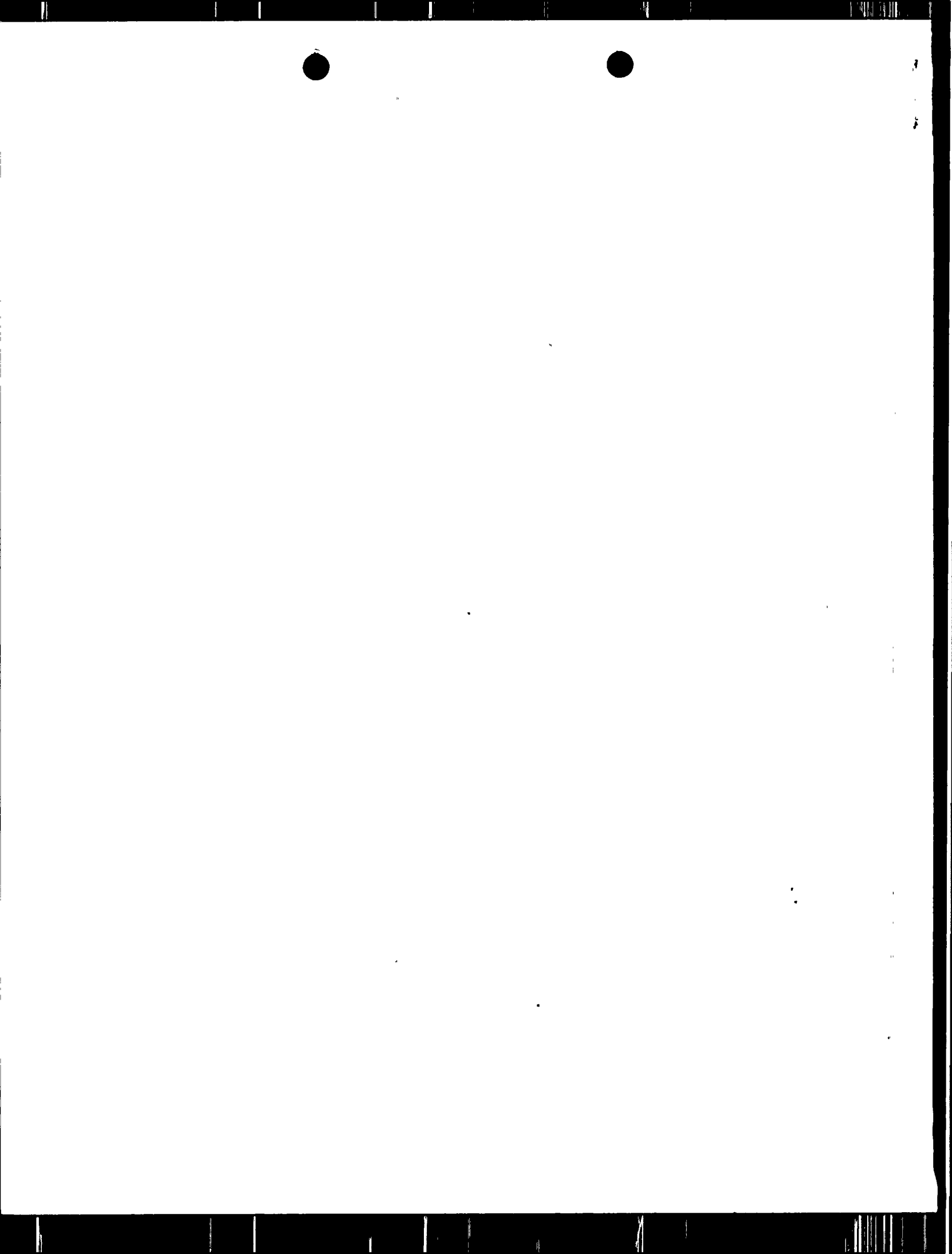
ACCESSION NBR: 8709300151 DOC. DATE: 87/09/25 NOTARIZED: NO DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 AUTH. NAME AUTHOR AFFILIATION
 SAMPSON, J. R. Indiana & Michigan Electric Co.
 SMITH, W. G. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 87-018-00: on 870826, certain fire rated assemblies & dampers declared inoperable due to incorrect application of surveillance requirements. Caused by personnel error.
 Administrative actions taken re individual. W/870925 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
 TITLE: 50.73 Licensee Event Report (LER); Incident Rpt, etc.

NOTES:

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INTERNAL:	ACRS MICHELSON	1 1	ACRS MOELLER	2 2
	AEOD/DOA	1 1	AEOD/DSP/NAS	1 1
	AEOD/DSP/ROAB	2 2	AEOD/DSP/TPAB	1 1
	DEDRO	1 1	NRR/DEST/ADS	1 0
	NRR/DEST/CEB	1 1	NRR/DEST/ELB	1 1
	NRR/DEST/ICSB	1 1	NRR/DEST/MEB	1 1
	NRR/DEST/MTB	1 1	NRR/DEST/PSB	1 1
	NRR/DEST/RSB	1 1	NRR/DEST/SGB	1 1
	NRR/DLPQ/HFB	1 1	NRR/DLPQ/QAB	1 1
	NRR/DOEA/EAB	1 1	NRR/DREP/RAB	1 1
	NRR/DREP/RPB	2 2	NRR/DRIS/SIB	1 1
	NRR/PMAS/ILRB	1 1	REG FILE 02	1 1
	RES DEPY GI	1 1	RES TELFORD, J	1 1
	RES/DE/EIB	1 1	RGN3 FILE 01	1 1
EXTERNAL:	EG&G GROH, M	5 5	H ST LOBBY WARD	1 1
	LPDR	1 1	NRC PDR	1 1
	NSIC HARRIS, J	1 1	NSIC MAYS, G	1 1



LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) D.C. Cook Nuclear Plant, Unit 1										DOCKET NUMBER (2) 0 5 0 0 0 3 1 5 1					PAGE (3) 1 OF 0 5												
TITLE (4) Fire Rated Assemblies and Dampers Inoperable Due to Incorrect Application of Surveillance Requirement for Inspecting Fire Seals																											
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 NAMES				DOCKET NUMBER(S)														
0	8	2	6	8	7	8	7	0	1	8	0	0	0	9	2	5	8	7	D.C. Cook Unit 2	0	5	0	0	0	3	1	6
OPERATING MODE (9) 1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																								
POWER LEVEL (10) 0 8 0			20.402(b)				20.406(c)				50.73(a)(2)(iv)				73.71(b)												
			20.406(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)												
			20.406(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vii)				<input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A)												
			20.406(a)(1)(iii)				<input checked="" type="checkbox"/> 50.73(a)(2)(i)				50.73(a)(2)(viii)(A)				Special Report												
			20.406(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)																
			20.406(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)																
LICENSEE CONTACT FOR THIS LER (12)																											
NAME J.R. Sampson, Safety and Assessment Department Superintendent														TELEPHONE NUMBER AREA CODE 6 1 6 4 6 5 - 5 9 0 1													
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																											
CAUSE	SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NPRDS																	
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR											
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												<input checked="" type="checkbox"/> NO															

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

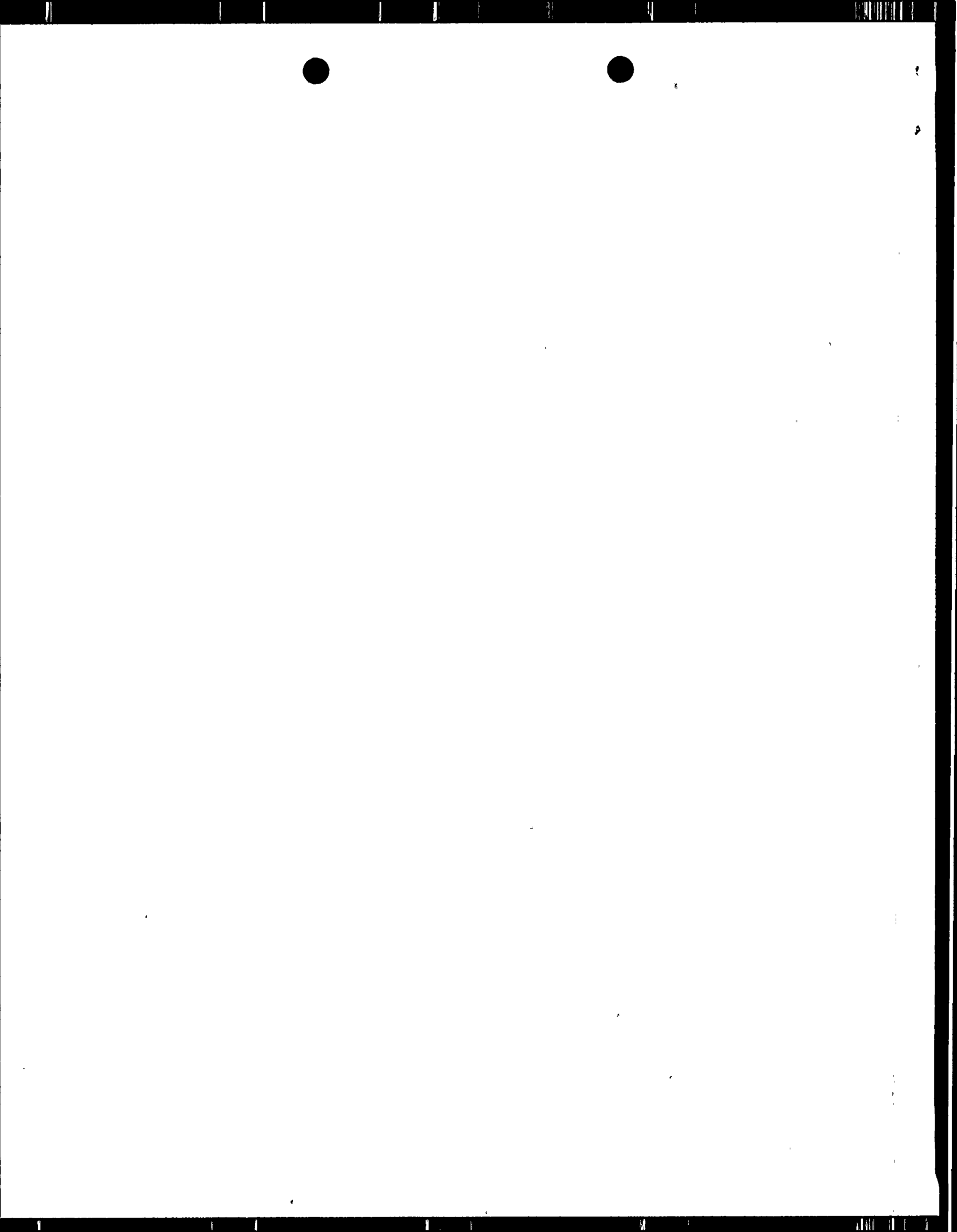
On August 26, 1987, at 1615 hours, with Unit 1 in Mode 5 (Cold Shutdown) and Unit 2 in Mode 1 (Power Operation) at 80 percent reactor thermal power, certain fire rated assemblies and fire dampers were declared inoperable. It was determined that the surveillance requirements required by Technical Specification 4.7.10.1.a and 4.7.10.1.b were performed on 10 percent of the fire rated assemblies (walls, floors, ceilings, cable tray enclosures) and dampers. The untested fire rated assemblies were technically inoperable from 03/29/87 until 08/29/87, when the surveillance activity was completed. The untested fire dampers were technically inoperable from 07/01/87 until 08/29/87 when the surveillance activity was completed on all but one (1) damper. The final damper was tested on 09/14/87.

This event was caused by personnel error (non-licensed supervisor) in that the 10 percent test requirement of Surveillance 4.7.10.1.c for sealed penetrations was incorrectly applied to Surveillances 4.7.10.1.a and 4.7.10.1.b.

Surveillance procedures currently in place have been reviewed and determined to be adequate to correctly direct performance of the required inspections. Future surveillances performed for these activities will include all fire rated assemblies and dampers. Appropriate administration actions were taken concerning the individual involved.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

Conditions Prior to Occurrence

Unit 1 in Mode 5 (Cold Shutdown) and Unit 2 in Mode 1 (Power Operation) at 80 percent reactor thermal power (RTP).

Description of Event

On August 26, 1987, at 1615 hours, it was determined during a review of Technical Specification 3.7.10 surveillance requirements, that surveillance items 4.7.10.1.a and 4.7.10.1.b were not performed at the specified frequency on all fire rated assemblies (walls, floors, ceilings, cable tray enclosures) (EIIS/NF-BHD) and dampers (EIIS/VF-DMP). The surveillance activity requires that each fire rated assembly and damper be visually inspected every 18 months.

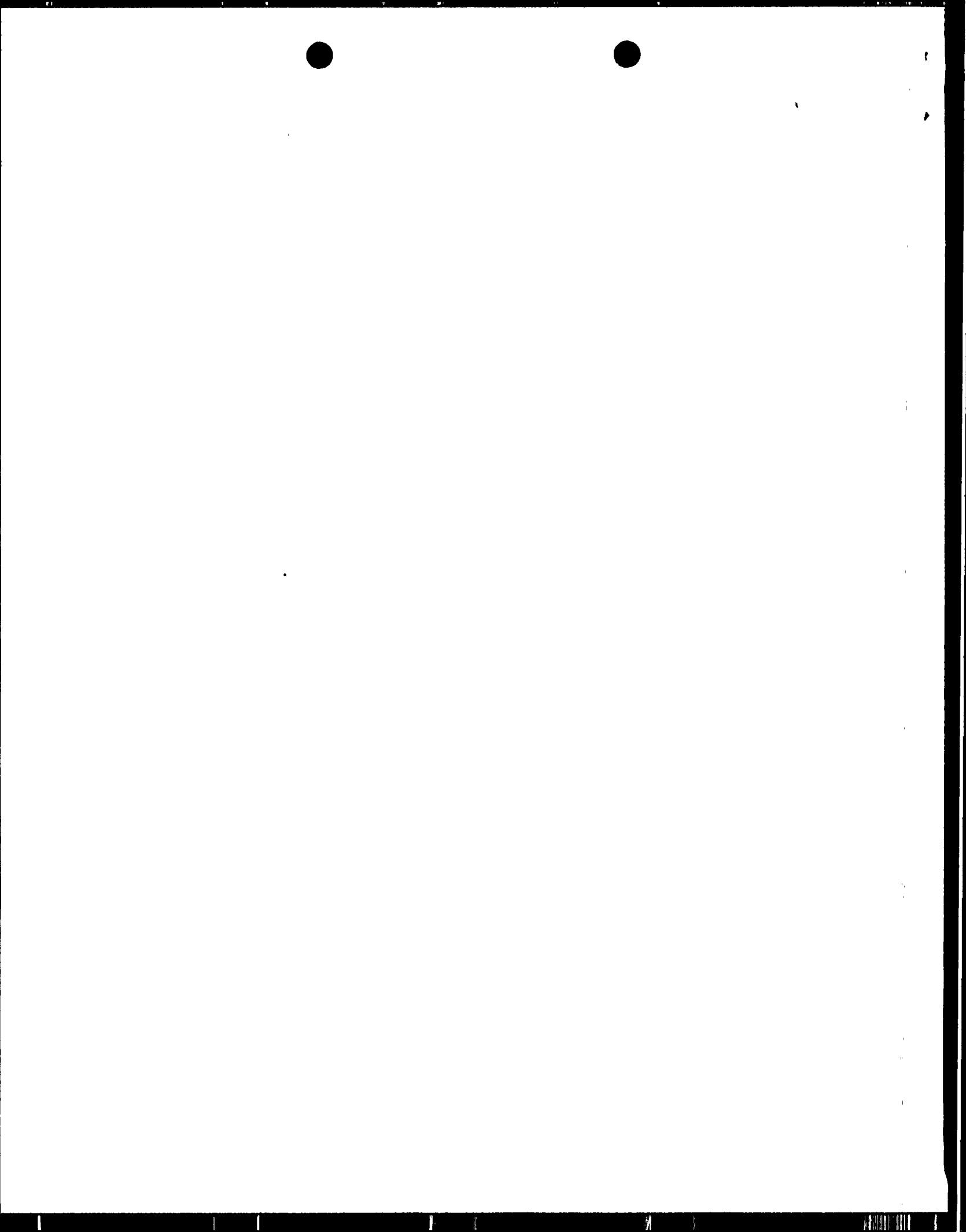
During the last surveillance of the fire rated assemblies (December, 1986), only 10 percent of the fire rated assemblies were inspected. This 10 percent sampling frequency is allowed only for the 18 month fire barrier penetration seal (EIIS/NF-SEAL) inspections. The remaining 90 percent of the fire rated assemblies were technically inoperable from March 29, 1987, when the grace period expired, until August 29, 1987, when re-inspections were completed.

During the last surveillance of the fire rated dampers (June, 1987), only 10 percent of the fire dampers were inspected. The remaining 90 percent of the fire dampers were technically inoperable from July 1, 1987, when the grace period expired, until August 29, 1987, when all but one (1) damper was tested. The final damper was tested on September 14, 1987.

The surveillance activity for inspection of fire rated assemblies (4.7.10.1.a) is included in the procedure for inspection of the fire barrier penetration seal inspections. Before December, 1986, 100 percent of the fire barrier penetration seals as well as 100 percent of the fire rated assemblies were inspected during a common surveillance activity. In the December, 1986, surveillance, only 10 percent of the seals were inspected as permitted by surveillance 4.7.10.1.c. An incorrect interpretation of the surveillance requirements at that time resulted in the inspection of 10 percent of the fire rated assemblies where 100 percent inspection is required by 4.7.10.1.a. Attached is a copy of surveillance 4.7.10.1.

Similar to the above, during the June, 1987, inspection of dampers, the surveillance requirements were incorrectly interpreted, resulting in the 10 percent inspection rate of 4.7.10.1.c being incorrectly applied to this inspection activity.

The fire rated assemblies and dampers were declared inoperable upon discovery of these errors at 1615 hours, August 26, 1987. However, due to the number of compensatory personnel required (16), fire watches were not posted in all



LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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affected areas until 1720 hours. (This exceeded the Technical Specification Action Statement one hour requirement by five minutes.)

Listed below is a sequence of events for the fire rated assembly and damper inspection deficiencies:

Fire Rated Assemblies

May 1985 - All assemblies inspected.

December 1986 - 10 percent of assemblies inspected.

March 29, 1987 - Assemblies not inspected in December, 1987, became technically inoperable when surveillance grace time expired.

August 26, 1987 - Discovered surveillance test discrepancy.

August 29, 1987 - All assemblies inspected and declared operable.

Fire Rated Dampers

December 1985 - All dampers inspected.

June 1987 - 10 percent of dampers inspected.

July 1, 1987 - Dampers not inspected in June, 1987, became technically inoperable when surveillance grace time expired.

August 26, 1987 - Discovered surveillance test discrepancy.

August 29, 1987 - All but one damper inspected.

September 14, 1987 - Last damper inspected.

There were no inoperable structures, systems, or components that contributed to this event. (Discrepant fire dampers and fire penetration seals found during the subsequent inspections are identified and addressed in the Analysis Section below.)

Cause of Event

This event was caused by personnel error in that a non-licensed supervisor incorrectly applied the 10 percent inspection requirements of surveillance 4.7.10.1.c (fire barrier penetration seal inspections) to the surveillance activities for fire rated assemblies (4.7.10.1.a) and dampers (4.7.10.1.b), (attached is a copy of Technical Specification surveillance items 4.7.10.1.a, b and c). The incorrect interpretation of inspection requirements and subsequent decision to test 10 percent of the fire rated assemblies and dampers was a cognitive error.

Analysis of Event

This event was determined to be reportable per 10 CFR 50.73(a)(2)(i), since the surveillance test frequency did not meet Technical Specification requirements

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

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to demonstrate equipment operability. This report also fulfills the Special Report requirements of Technical Specification 3.7.10.

During the August, 1987, inspection, one (1) unsealed penetration and six (6) degraded fire seals were discovered. Safety Evaluations have determined that these deficiencies did not significantly degrade the individual fire barriers.

During the August, 1987, inspections, three (3) dampers were determined to be inoperable. These dampers were repaired, retested, and declared operable. Safety evaluations have determined that these deficiencies did not significantly degrade the individual fire barriers.

Corrective Actions

The existing surveillance procedures have been reviewed and have been reconfirmed to be adequate to correctly direct performance of the required visual inspections. Future surveillances performed to satisfy Technical Specification surveillance requirements 4.7.10.1.a and 4.7.10.1.b will be completed at the 100 percent rate as required.

Appropriate administrative actions were taken concerning the individual involved.

Failed Components

Plant Designation:	1-HV-AS-D2A	1-HV-AS-D4	2-HV-AS-D5
Manufacturer:	Airstream	Airstream	Airstream
Model:	Curtain (52x42)	Curtain (51-3/4x23-3/4)	Curtain (40x30)
ELIS Code:	VF - DMP	VF - DMP	VF - DMP

Previous Similar Events

None

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

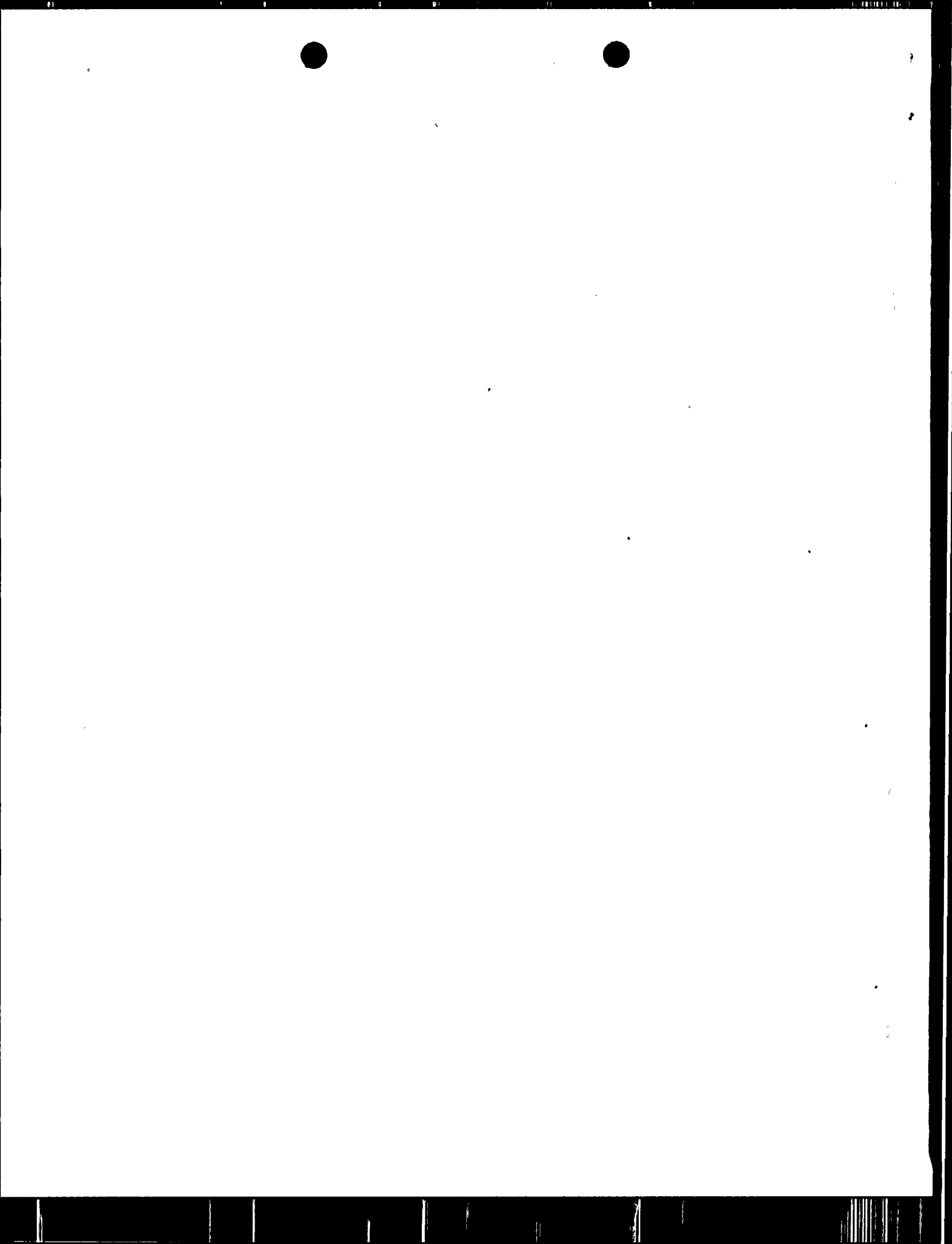
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Attachment - Technical Specification Surveillance Requirements

4.7.10.1 At least once per 18 months the above required fire rated assemblies and penetration sealing devices shall be verified OPERABLE by:

- a. Performing a visual inspection of the exposed surfaces of each fire rated assemblies.
- b. Performing a visual inspection of each fire damper and associated hardware.
- c. Performing a visual inspection of at least 10 percent of each type of sealed penetration. If apparent changes in appearance or abnormal degradations are found, a visual inspection of an additional 10 percent of each type of sealed penetration shall be made. This inspection process shall continue until a 10 percent sample with no apparent changes in appearance or abnormal degradation is found.



Indiana Michigan
Power Company
Cook Nuclear Plant
P.O. Box 458
Bridgman, MI 49106
616 465 5901



September 25, 1987

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


Operating License DPR-58
Docket Number 50-315

Document Control Manager:

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

87-018-00

Sincerely,


W. G. Smith, Jr.
Plant Manager

WGS:afh

Attachment

cc: J. E. Dolan
A. B. Davis, Region III
M. P. Alexich
R. F. Kroeger
R. W. Jurgensen
H. B. Brugger
D. L. Wigginton, NRC
NRC Resident Inspector
Dottie Sherman, ANI Library
R. C. Callen, MPSC
D. Hahn, MDPH
G. Charnoff, Esq.
INPO
PNSRC
J. G. Feinstein/B. P. Lauzau

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