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 FACIL:50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
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SUBJECT: LER 88-002-00:on 880205,surveillance procedure deficient due to cognitive personnel error when reviewing Tech Spec amend.
 W/8 ltr.

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 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) D. C. Cook Nuclear Plant, Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 1 6										PAGE (3) 1 OF 0 4													
TITLE (4) Surveillance Procedure Deficient Due to Cognitive Personnel Error When Reviewing T.S. Amendment For Impact on Procedures																																	
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	2	0	5	8	8	8	8	0	0	2	0	0	0	3	0	4	8	8	D. C. Cook, Unit 1						0 5 0 0 0 3 1 5								
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																														
POWER LEVEL (10)			20.402(b)				20.406(c)				50.73(a)(2)(iv)				73.71(b)																		
0			20.406(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)																		
8			20.406(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)																		
0			20.406(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(vii)(A)																						
			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												TELEPHONE NUMBER																					
K. R. Baker, Operations Superintendent												AREA CODE																					
												6		1		6		4		6		5		-		5		9		0		1	
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On February 5, 1988, it was identified that the Unit 2 Surveillance procedure containing channel checks for the power range nuclear instrumentation did not require channel checks below Mode 2 (Start-Up) whenever the control rod drive system was capable of withdrawal as required by Technical Specification (T.S.) 3.3.1.1. This requirement was added by T.S. amendment number 82 on May 21, 1986, but the person reviewing the amendment for required procedure changes failed to identify the change due to personnel error. A review identified two time periods when channel checks were not performed as required.

A similar condition existed in Unit 1, however no missed surveillances were identified.

The surveillance procedures for Unit 1 and Unit 2 were changed on February 5, 1988, to require a channel check whenever the control rod drive system is capable of withdrawal. A second independent technical review was performed on amendment number 82 for impact on Operations Department procedures, with no similar problems found. The administrative procedure controlling the T.S. amendment review process will be revised by June 24, 1988, to require additional technical reviews of amendments for impact on plant procedures.

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D. C. Cook Nuclear Plant, Unit 2	0 5 0 0 0 3 1 6 8 8	—	0 0 2	—	0 0	0 2	OF 0 4

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

Conditions Prior to Occurrence

Unit 1 was in Mode 1 (Power Operation) at 90 percent rated thermal power.
Unit 2 was in Mode 1 (Power Operation) at 80 percent rated thermal power.

Description of Event

On February 5, 1988, at 1500 hours it was identified that the Unit 2 daily and shift surveillance procedure required a channel check of the power range nuclear instrumentation (EIIS/IG) during Modes 1 and 2 only. This was non-conservative with respect to T.S. 3.3.1.1 which requires channel checks every twelve hours whenever the control rod drive system (EIIS/AA) is capable of withdrawal. This deficiency was discovered during revision work for the procedure.

The requirement for channel checks whenever the control rod drive system is capable of withdrawal was added to the Unit 2 Technical Specifications on May 21, 1986, by amendment number 82. A review of surveillances during time periods when the control rod drive system was capable of withdrawal below Mode 2 determined that there were two time periods when the channel checks were not performed as required. Although the procedure did not require a channel check below Mode 2, some channel checks were performed; however the T.S. required time interval was not always met. The longest period of time identified between channel checks or between a channel check and when the control rod drive system was no longer capable of withdrawal, was approximately thirty-five hours between 06/28/86 and 06/29/86. There were no failed components which contributed to this event.

A related condition existed for Unit 1 in that T.S. surveillance table 4.3-1 requires a channel check of the power range nuclear instrumentation whenever the control rod drive system is capable of withdrawal; however the Limiting Conditions for Operation only requires the instrumentation to be operable in Modes 1 and 2. The surveillance requirement for whenever the control rod drive system is capable of withdrawal was inadvertently added to table 4.3-1 by amendment number 99 on December 12, 1986. This change in amendment number 99 was not marginally marked, which explains why it was not identified by the amendment reviewers.

A review of Unit 1 surveillances for time periods when the control rod drive system was capable of withdrawal below Mode 2 did not identify any events where the power range instrumentation channel checks were not performed as required by the inadvertent amendment number 99 change.

The condition in Unit 1 is not considered reportable under the requirements of 10 CFR 50.73, but is being voluntarily reported.

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

Cause of the Event

The deficiency in the Unit 2 surveillance procedure was caused by failure of the individual (utility licensed operator) reviewing T.S. amendment number 82, for impact on Operations Department procedures, to identify the additional requirement. Contributing to this cognitive personnel error was the size and complexity of the amendment.

The cause for the inadvertent addition of the Unit 1 surveillance requirement by amendment 99 for the power range instrumentation could not be determined.

Analysis of the Event

The Unit 2 event is considered reportable pursuant to 10 CFR 50.73 (a) (2)(iB).

During times when the Unit 2 control rod drive system was capable of withdrawal in Mode 3, the source range and intermediate range nuclear instrumentation (EIIIS/IG) was maintained operable as required by T.S. 3.3.1.1 and provided reactor trip protection for high neutron flux conditions. Also during these time periods, the required channel functional test and channel calibrations for the power range channels were performed. Additionally, observations of the nuclear instrumentation were made during control panel walkdowns for shift turnover; any significant observable problems with the power range channels would have been identified during these observations. Therefore it is believed that the power range channels would have provided the required neutron flux protection.

Based on the above it is concluded that this event did not result in a condition that posed a significant safety problem as defined in 10 CFR 50.59.

Corrective Actions

The Unit 1 and Unit 2 surveillance procedures were changed on February 5, 1988, to require a channel check of the power range nuclear instrumentation whenever the control rod drive system is capable of withdrawal.

A second independent technical review was performed on amendment number 82 for impact on Operations Department procedures, with no similar problems found.

The administrative procedure controlling the Technical Specification amendment review process for all departments, will be revised by June 24, 1988, to require additional technical reviews of amendments for impact on plant procedures.

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

Failed Component Identification

None

Previous Similar Events

LER 50-315/86-022

LER 50-316/86-028

LER 50-316/87-003

Indiana Michigan
Power Company
Cook Nuclear Plant
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616 465 5901



March 4, 1988

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


Operating License DPR-58
Docket No. 50-316

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:

88-002-00

Sincerely,


W. G. Smith, Jr.
Plant Manager

WGS:afh

Attachment

cc: D. H. Williams, Jr.
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