

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8810070042 . DOC. DATE: 88/09/28 NOTARIZED: NO . DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME AUTHOR AFFILIATION
 WOJCIK, J.T. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele.
 SMITH, W.G. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-009-00: on 880829, non-compliance w/Tech Specs due to
 open pathway from containment during core alteration.
 W/8 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD3-1 LA	1 1	PD3-1 PD	1 1
	STANG, J	1 1		
INTERNAL:	ACRS MICHELSON	1 1	ACRS MOELLER	2 2
	ACRS WYLIE	1 1	AEOD/DOA	1 1
	AEOD/DSP/NAS	1 1	AEOD/DSP/ROAB	2 2
	AEOD/DSP/TPAB	1 1	ARM/DCTS/DAB	1 1
	DEDRO	1 1	NRR/DEST/ADS 7E	1 0
	NRR/DEST/CEB 8H	1 1	NRR/DEST/ESB 8D	1 1
	NRR/DEST/ICSB 7	1 1	NRR/DEST/MEB 9H	1 1
	NRR/DEST/MTB 9H	1 1	NRR/DEST/PSB 8D	1 1
	NRR/DEST/RSB 8E	1 1	NRR/DEST/SGB 8D	1 1
	NRR/DLPQ/HFB 10	1 1	NRR/DLPQ/QAB 10	1 1
	NRR/DOEA/EAB 11	1 1	NRR/DREP/RAB 10	1 1
	NRR/DREP/RPB 10	2 2	NRR/DRIS/SIB 9A	1 1
	NUDOCS-ABSTRACT	1 1	<u>REG FILE</u> 02	1 1
	RES TELFORD, J	1 1	RES/DSIR DEPY	1 1
	RES/DSIR/EIB	1 1	RGN3 FILE 01	1 1
EXTERNAL:	EG&G WILLIAMS, S	4 4	FORD BLDG HOY, A	1 1
	H ST LOBBY WARD	1 1	LPDR	1 1
	NRC PDR	1 1	NSIC HARRIS, J	1 1
	NSIC MAYS, G	1 1		

TOTAL NUMBER OF COPIES REQUIRED: LTTR 46 ENCL 45

[Handwritten signature]
 11/10/88

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 3			
TITLE (4) Non-compliance With Technical Specifications Due to Open Pathway From Containment During Core Alteration and Fuel Movement																							
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 D. C. Cook, Unit 1						DOCKET NUMBER(S) 0 5 0 0 0 3 1 5								
0	8	2	9	8	8	0	0	9	0	0	0	9	2	8	8	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)				20.405(c)				50.73(a)(2)(iv)				73.71(b)									
		20.405(a)(1)(i)				50.38(c)(1)				50.73(a)(2)(v)				73.71(c)									
		20.405(a)(1)(ii)				50.38(c)(2)				50.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
		20.405(a)(1)(iii)				X 50.73(a)(2)(i)				50.73(a)(2)(viii)(A)													
		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)(ix)													
LICENSEE CONTACT FOR THIS LER (12)																							
NAME J. T. Wojcik - Technical Physical Sciences 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	MANUFACTURER	REPORTABLE TO NPDs		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs													
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 29, 1988, it was identified that for short periods of time (typically two to five minutes) while a radiation protection technician was changing out the particulate filters and iodine cartridges for the lower containment monitors, an open pathway from the containment atmosphere to the auxiliary building was established. The change out is performed at least once per day, and the same procedure has been followed since these monitors were installed on Unit 1 and Unit 2 in 1985. The condition is unique to the containment integrity requirements during core alterations due to the fact that there is no automatic containment isolation signal operable for the radiation monitoring system during this mode of operation.

The cause of this event was an inadequate procedure which allowed the particulate filters and iodine cartridges to be changed during core alteration conditions without first establishing positive containment isolation.

When this condition was identified core alteration and fuel movement for the current Unit 2 refueling outage had ceased. As preventive action, procedure **12 THP 6010 RAD.124 has been revised to include steps to isolate the sample inlet prior to changing particulate filters and iodine cartridges.

8810070042 030723
PDR ADOCK 05000315
S PMU

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
D. C. Cook Nuclear Plant, Unit 2	0 5 0 0 0 3 1 6	8 8	— 0 0 9	— 0 0	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 365A's) (17)

Conditions Prior to Occurrence

Unit 1 at 90 percent reactor thermal power, Unit 2 refueling..

Description of Event

On August 29, 1988, during a drawing review for a refueling integrity procedure revision, it was identified that for short periods of time (typically two to five minutes) while a radiation protection technician was changing out the particulate filters and iodine cartridges for the lower containment radiation monitors (ERS-1300 and ERS-1400 in Unit 1 and ERS-2300 and ERS-2400 in Unit 2) (EIIS/IL-MON) an open pathway from the containment atmosphere to the auxiliary building was established. The particulate filter and iodine cartridge change out was performed per an approved procedure with the radiation protection technician present through the entire change out procedure. The change out is performed at least once per day, and the same procedure has been followed since these monitors were installed on Unit 1 and on Unit 2 in 1985. The condition is unique to the containment integrity requirements during core alterations due to the fact that there is no automatic containment isolation signal operable for the radiation monitoring system during this mode of operation. Since this condition was not recognized during previous refueling outages, it is very likely that the open pathway may have existed during previous core alterations or movement of irradiated fuel within the containment building.

No inoperable structures, components, or systems contributed to the significance of this event.

Cause of Event

This event was caused by the procedural inadequacy which allowed the particulate filters and iodine cartridges to be changed during core alteration conditions without first establishing positive containment isolation.

Analysis of the Event

This event is considered a failure to comply with Technical Specification 3.9.4 Action Statement requirements in that core alterations or movement of irradiated fuel within the containment building were not suspended while the particulate filters and iodine cartridges were being changed and therefore reportable under 10 CFR 50.73(a)(2)(i).

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
D. C. Cook Nuclear Plant, Unit 2	0 5 0 0 0 3 1 6	8 8	— 0 0 9	— 0 0	0 3	OF	0 3

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

The existence of the direct pathway from the containment atmosphere for the two to five minutes while the particulate filters and iodine cartridges were being changed would not significantly increase the offsite dose from a fuel handling accident within the containment based on the following facts; (1) the short duration that the open pathway existed, (2) there was always a radiation protection technician present that immediately could have isolated the pathway, (3) the small size of the penetration (one inch diameter pipe) and (4) similar evolutions such as opening a manual isolation valve in containment atmosphere sampling line on an intermittent basis under administrative control to obtain grab samples is permitted by the Technical Specifications. Thus the health and safety of the public were not affected by this event.

Corrective Action

When this condition was identified core alteration and fuel movement for the current Unit 2 refueling outage had ceased. As preventive action procedure **12 THP 6010 RAD.124 has been revised to include steps to isolate the sample inlet line prior to changing particulate filters and iodine cartridges.

Failed Component Identification

No component failures were identified during this event.

Previous Similar Events

None.

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



September 28, 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:

88-009-00

Sincerely,


W. G. Smith, Jr.
Plant Manager

WGS:clw

Attachment

cc: D. H. Williams, Jr.
A. B. Davis, Region III
M. P. Alexich
P. A. Barrett
J. E. Borggren
R. F. Kroeger
NRC Resident Inspector
J. F. Stang, NRC
R. C. Callen
G. Charnoff, Esq.
Dottie Sherman, ANI Library
D. Hahn
INPO
PNSRC
A. A. Blind
S. J. Brewer/B. P. Lauzau.

IE22
11