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ACCESSION NBR:8810310171 DOC.DATE: 88/10/22 NOTARIZED: NO DOCKET #.
 FACIL:50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
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SUBJECT: LER 88-010-00:on 880927,containment purge sys ~~in~~ svc w/o
 required radiation monitoring alarm annunciation in CR.
 W/8 ltr.

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) D. C. Cook Nuclear Plant, Unit Two										DOCKET NUMBER (2) 0 5 0 0 0 3 1 1 6 1 OF 0 3										PAGE (3) 1 OF 0 3	
TITLE (4) Containment Purge System in Service Without the Required Radiation Monitoring Alarm Annunciation in the Control Room Due to Personnel Error																					
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 9	2 7	8 8	8 8	0 1 0	0 0	1 0	2 2	8 8						0 5 0 0 0 0 0 0 0 0 0 0							
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																			
6		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)							
POWER LEVEL (10)		20.406(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)							
0 0 0		20.406(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)							
		20.406(a)(1)(iii)				X 50.73(a)(2)(i)				50.73(a)(2)(viii)(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)(x)											
LICENSEE CONTACT FOR THIS LER (12)																					
NAME K. R. Baker, Operations Superintendent.										TELEPHONE NUMBER AREA CODE 6 1 6 4 6 5 1 - 5 9 0 1 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					
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO											

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

On 09-27-88 and 09-28-88, with the Unit in Mode 6, no fuel in the core, no requirement for containment integrity, and the containment equipment hatch removed, the Containment Purge System was in service a total of 11 hours and 42 minutes with the Control Room high radiation alarm annunciation, required by T.S. 3.3.3.1 and 3.3.3.10, inoperable due to design change work on the Eberline Radiation Monitoring System (RMS) Control Terminal (CT). The Control Room alarm annunciation was the only RMS monitor function lost. The RMS was capable of monitoring the release and initiating a containment purge isolation signal upon an actual high radiation condition.

The cause of this event was personnel error. The personnel planning the RMS CT work misread an administrative guideline as saying that the monitors were still operable without the Control Room alarm annunciation, if the local readings were recorded. On 09-28-88, the interpretation error was noted by the Operations Unit Coordinator and containment purge was removed from service.

The involved administrative guideline has been revised to clearly state that the radiation monitors are inoperable when the Control Room alarm annunciation is lost.

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

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

Conditions Prior to Occurrence

Unit Two in Mode 6 (Refueling). No fuel in the reactor vessel, no fuel being moved, no requirement for containment integrity, and the containment equipment hatch removed.

Description of Event

On September 27, 1988, at 1750, with the Containment Purge System (EIIS/VA) in service, the Unit Two Eberline Radiation Monitoring System (RMS) Control Terminal (CT) (EIIS/IL-AIK) was removed from service to complete a design change. The removal of the CT from service rendered the high radiation Control Room alarm annunciation inoperable for the containment and vent stack radiation monitors.

T.S. 3.3.3.1 Table 4.3-3 requires a monthly channel functional test of the containment radiation monitors and T.S. 3.3.3.10 Table 4.3-9 requires a quarterly channel functional test of the vent stack radiation monitor. T.S. definition 1.11 and Table 4.3-3 notation 1., define a channel functional test as including a verification of alarm capability. Notation 1. of Table 4.3-3 defines alarm capability as Control Room annunciation. Since the alarm function was not available while the CT was removed from service, the containment and vent stack radiation monitors were inoperable. The radiation monitors however were fully capable of monitoring the release and the containment radiation monitors were fully capable of initiating a containment purge isolation signal upon reaching the high radiation alarm setpoint. The action statement requirements of T.S. 3.3.3.1 and 3.3.3.10 require removing the Containment Purge System from service if the associated radiation monitors were inoperable.

An additional review of the T.S. requirements on 09/28/88 by the Unit Coordinator (Licensed Senior Reactor Operator), who was involved in the pre-planning of the CT work, identified the T.S. requirement for removing the Containment Purge System from service when the Control Room alarm annunciation for the associated radiation monitors was inoperable. The Containment Purge System was then removed from service. The total in service time for containment purge during this event was 11 hours and 42 minutes.

Cause of Event

Prior to this event, an administrative guideline had been written to define how the compensatory surveillance requirements for an inoperable radiation monitor could be met when the radiation monitor was inoperable solely due to loss of the high radiation Control Room alarm annunciation. The Unit

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TEXT (If more space is required, use additional NRC Form 368A's) (17)

Coordinator and the Radiation Protection Supervisor planning the RMS design change work, reviewed the administrative guideline, but misunderstood it as saying the radiation monitors would remain operable as long as local monitor readings were recorded periodically to ensure the radiation monitors remained in service. This interpretation of the administrative guideline was communicated to the Unit Two Control Room Unit Supervisor (Senior Licensed Reactor Operator), who then allowed the CT to be removed from service without first removing the Containment Purge System from service.

The wording of the administrative guideline was satisfactory, however one portion of the guideline was susceptible to misunderstanding and it was this portion which was misunderstood by the planners for the RMS CT work.

Analysis of Event

This event is considered reportable under 10 CFR 50.73.a.2.i.B, Operations or Condition Prohibited by T.S.

The containment and vent stack radiation monitors were fully operable except for the Control Room alarm annunciation and were continuously monitoring the containment atmosphere and release path during this event. Also, the containment radiation monitors were capable of initiating a Containment Purge System isolation upon a monitor reaching the high radiation alarm setpoint. During this event the Unit was in Mode 6 with no fuel in the reactor vessel or in the containment, no requirement for containment integrity, and the containment equipment hatch removed.

Based on the RMS capability which existed during this event and the remote possibility for a release since no fuel was in the reactor vessel or the containment, it was concluded that there was no risk to the public health and safety.

Corrective Action

The involved administrative guideline has been revised to more clearly state the inoperable status of applicable radiation monitors when the high radiation Control Room alarm annunciation is inoperable.

Previous Similar Events

None.

Indiana Michigan
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616 465 5901



October 21, 1988

United States Nuclear Regulatory Commission
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Docket No. 50-316

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In accordance with the criteria established by 10 CFR 50.73
entitled Licensee Event Reporting System, the following
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88-010-00

Sincerely,


W. G. Smith, Jr.
Plant Manager

WGS:clw

Attachment

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