

LICENSEE EVENT REPORT (LER)

(See reverse for required number of
digits/characters for each block)ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY
INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE
INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY.
FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND
RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY
COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION
PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC
20503

FACILITY NAME (1) Cook Nuclear Plant Unit 1	DOCKET NUMBER (2) 05000-315	PAGE (3) 1 of 1
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TITLE (4) Failure to Perform Technical Specification Surveillance Analyses of Reactor Coolant Chemistry with Fuel Removed
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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 NAME	DOCKET NUMBER
10	30	1997	1999	-- 004 --	00	03	18	1999	D.C. Cook, Unit 2	05000-316
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		00	20.2201 (b)		20.2203(a)(2)(v)		<input checked="" type="checkbox"/> 50.73(a)(2)(i)		50.73(a)(2)(viii)	
			20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)	
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71	
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER	
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or on NRC Form 366A	
			20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)			

LICENSEE CONTACT FOR THIS LER (12)

NAME Mr. Donald C. Kosloff, Compliance Engineer	TELEPHONE NUMBER (Include Area Code) 616/465-5901, X2129
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input checked="" type="checkbox"/> YES (If Yes, complete EXPECTED SUBMISSION DATE).			NO			05	28	1999

Abstract (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On February 16, 1999, chemistry department personnel determined that Unit 2 reactor coolant system (RCS) chemistry had not been analyzed for fluorides and chlorides, as required by Technical Specification (TS) Surveillance Requirement 4.4.7, while the unit was in an undefined operating mode with all fuel removed from the RCS. The analyses, required "At all times," were not performed from October 30 to November 23, 1997. Unit 2 has remained in Mode 5 or 6 since that time. Additional investigation identified at least seven other periods, for both units, when the chemistry analyses had not been performed. TS Clarification #54 was in force during these seven periods, and provided an inappropriate exemption from sampling while the core was off-loaded and RCS circulation was suspended. Since there was no evidence of an out-of-limit chemistry condition, in each case the limiting condition for operation required action for TS 3.4.7 was not taken, in that an analysis was not performed to determine the effects of a possible out-of-limit condition. As the surveillance requirements were not met, this event is reportable under 10CFR 50.73(a)(2)(i)(B), as operation prohibited by the plants' Technical Specifications.

TS Clarification #54 was cancelled on July 23, 1997. However, by the time the TS clarification was cancelled, the chemistry department had established written direction stating that when fuel was removed from the RCS, the spent fuel pool became the RCS for chemistry sampling purposes. Chemistry personnel have been instructed on the requirement to follow the TS as written without reliance on the use of TS clarifications or interpretations. The written job order activities used to control shutdown chemistry sampling were corrected to remove references to the spent fuel pool as an alternate RCS sample point. In each identified case when analyses were not done, the affected unit was at low pressure and temperature. In each identified case, analyses completed prior to and after the missed analyses provided no indication of an out-of-limit condition. The root cause investigation for this event is not complete. When the root cause investigation is complete an update to this LER will be submitted.

