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 FACIL:50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
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SUBJECT: LER 88-012-00:on 881111,turbine room sump not sampled &
 analyzed in accordance w/Tech Specs.

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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) OF 0 3					
TITLE (4) Turbine Room Sump Not Sampled and Analyzed in Accordance with Technical Specifications as a Result of Personnel Cognizant 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)								
1	1	1	8	8	0 1 2	0	0	1	2	1	2	8	8	D. C. Cook Plant Unit 2				0 5 0 0 0 3 1 6			
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(e)				50.73(a)(2)(iv)				73.71(b)						
0 9 0			20.405(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)						
			20.405(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)						
			20.405(a)(1)(iii)				X 50.73(a)(2)(ii)				50.73(a)(2)(viii)(A)										
			20.405(a)(1)(iv)				50.73(a)(2)(iii)				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 Department Superintendent												TELEPHONE NUMBER									
												AREA CODE									
												6 1 6		4 6 5 - 1 5 9 0 1							
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																					
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC											
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 November 11, 1988, during a review of plant Technical Specifications and the Off-site Dose Calculation Manual, it was identified that the Turbine Room Sump System had not been sampled and analyzed in accordance with Technical Specification 4.11.1.1, Table 4.11.1 as identified in the Off-site Dose Calculation Manual. As a result: 1) composite samples for the turbine Room sump have never been directly analyzed for strontium-89, strontium-90, iron-55 and Gross Alpha, and; 2) monthly grab samples of the Turbine Room Sump have never been sampled or analyzed for dissolved and entrained gases.

The root cause of this event was the failure to fully recognize the turbine building sump as a radioactive liquid effluent release pathway and implement all requirements of Technical Specification Table 4.11.1 when procedures for implementing the radioactive liquid waste sampling and analyses program were prepared. At no time would the regulatory limits of 10CFR20 Appendix B have been exceeded as a result of the discharge from the turbine room sump to unrestricted areas.

To prevent recurrence procedures have been updated to list the required, as per Technical Specification Table 4.11-1 sampling frequencies and analysis for the Turbine Building Sump System.

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PDR ADOCK 05000315
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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

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

CONDITIONS PRIOR TO OCCURRENCE

Unit 1 at 90 percent thermal power, Unit 2 in refueling mode with no fuel in reactor vessel.

DESCRIPTION OF EVENT

On November 11, 1988, during a review of plant Technical Specifications and the Off-site Dose Calculation Manual, it was identified that the Turbine Room Sump System (EIIS/WH) had not been sampled and analyzed in accordance with Technical Specification 4.11.1.1.1, Table 4.11-1, as required by the Off-site Dose Calculation Manual.

In the past, composite samples of the Turbine Room sump have been sampled and directly analyzed for principal gamma emitters, I-131, and H-3 on a daily basis. However, it was not recognized that the Turbine Building Sump System was identified as a plant continuous release point. It is therefore subject to the analysis program given in Table 4.11-1 of the Plant Technical Specifications. As a result: 1) composite samples for the Turbine Room Sump have never been directly analyzed for strontium-89, strontium-90, iron-55 and Gross Alpha, and; 2) monthly grab samples of the Turbine Room Sump have never been sampled or analyzed for dissolved and entrained gases (gamma emitters).

CAUSE OF EVENT

The root cause of this event was the failure to fully recognize the turbine building sump as a radioactive liquid effluent release pathway and implement all requirements of Technical Specification Table 4.11.1 when procedures for implementing the radioactive liquid waste sampling and analyses program were prepared.

ANALYSIS OF EVENT

This event is considered reportable under the criteria of 10 CFR 50.73 (a) (2)(i)(b) as a literal violation of Technical Specifications.

The only potential source of radioactive influent to the Turbine Building Sump System is secondary system leakage. The secondary system with highest concentration of radioactivity is the steam generator blowdown system. Based on these facts and the assumption that iron-55, strontium-89 and strontium-90 release concentrations for the turbine room sump are equal to the maximum release concentrations of the steam generator blowdown flash tank, a comparison of steam generator blowdown flash tank quarterly composite data and turbine room sump daily composite data with 10CFR20 limits was performed for periods

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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D. C. Cook Nuclear Plant Unit 1	0 5 0 0 0 3 1 5	8 8	0 1 2	0 0	0 3	OF	0 3

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when direct releases to the unrestricted areas occurred, i.e., when turbine room sump overflowed to Lake Michigan. This comparison found that all releases to unrestricted areas were within the limits of 10CFR20. Based on this, it is our belief that the failure to perform the analysis required by Technical Specification 4.11.1.1.1 has not resulted in any impact on the public health and safety. At no time would the regulatory limits of 10CFR20 Appendix B have been exceeded as a result of the discharge from the turbine room sump to unrestricted areas.

CORRECTIVE ACTION

To prevent recurrence procedures have been updated to list the required, as per Technical Specification Table 4.11-1 sampling frequencies and analysis for the Turbine Building Sump System.

FAILED COMPONENT IDENTIFICATION

None.

PREVIOUS SIMILAR EVENTS

Other events which involved the failure to recognize the requirements of Technical Specifications:

LER 85-002 - Missed Auxiliary Building Vent Samples

LER 88-009 - Failure to Meet Technical Specification Lower Limit Detection as a Result of the Misinterpretation of the Technical Specification Limit of Detection Value

Indiana Michigan
Power Company
Cook Nuclear Plant
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December 12, 1988

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

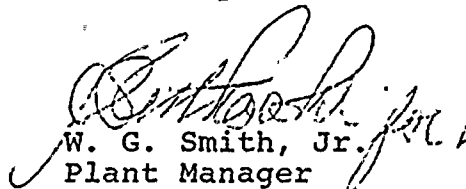
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Document Control Manager:

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

88-012-00

Sincerely,


W. G. Smith, Jr.
Plant Manager

WGS:clw

Attachment

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IE-22
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