

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8907250329 DOC. DATE: 89/07/14 NOTARIZED: NO DOCKET #  
 FACIL: 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316  
 AUTH. NAME AUTHOR AFFILIATION  
 BAKER, K.R. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele  
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-012-00: on 890624, monthly channel checks for  
 containment water level not included in sp.

W/8 ltr.

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 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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616 465 5901



July 14, 1989

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

89-012-00

Sincerely,

W. G. Smith, Jr.  
Plant Manager

WGS:clw

Attachment

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## LICENSEE EVENT REPORT (LER)

|   |        |  |                |                     |                 |                  |                 |           |                |                                      |  |                               |                  |  |     |      |
|---|--------|--|----------------|---------------------|-----------------|------------------|-----------------|-----------|----------------|--------------------------------------|--|-------------------------------|------------------|--|-----|------|
| FACILITY NAME (1)<br>D. C. Cook Nuclear Plant, Unit 2   |        |  |                |                     |                 |                  |                 |           |                | DOCKET NUMBER (2)<br>0 5 0 0 0 3 1 6 |  |                               |                  | PAGE (3)<br>1 OF 0 4   |     |      |
| TITLE (4) Surveillance Procedure Deficient Due to Personnel Error by Personnel Responsible<br>For Ensuring Procedures Were Revised For a T.S. Amendment |        |  |                |                     |                 |                  |                 |           |                |                                      |  |                               |                  |  |     |      |
| 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 6   | 2 4    | 8 9  | 8 9            | 0 1 2               | 0 0             | 0 7              | 1 4             | 8 9       |                |                                      |  |                               | 0 5 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) |                |                     |                 |                  |                 |           |                |                                      |  |                               |                  |  |     |      |
| 3   |        | 20.402(b)  |                |                     |                 | 20.406(c)        |                 |           |                | 50.73(a)(2)(iv)                      |  |                               |                  | 73.71(b)   |     |      |
| POWER LEVEL (10)  |        | 20.406(a)(1)(i)  |                |                     |                 | 50.38(e)(1)      |                 |           |                | 50.73(a)(2)(v)                       |  |                               |                  | 73.71(c)   |     |      |
| 0 0 0   |        | 20.406(a)(1)(ii)   |                |                     |                 | 50.38(e)(2)      |                 |           |                | 50.73(a)(2)(vi)                      |  |                               |                  | 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)(vii)(A)                  |  |                               |                  |  |     |      |
|   |        | 20.406(a)(1)(iv)   |                |                     |                 | 50.73(a)(2)(ii)  |                 |           |                | 50.73(a)(2)(vii)(B)                  |  |                               |                  |  |     |      |
|   |        | 20.406(a)(1)(v)  |                |                     |                 | 50.73(a)(2)(iii) |                 |           |                | 50.73(a)(2)(x)                       |  |                               |                  |  |     |      |
| LICENSEE CONTACT FOR THIS LER (12)  |        |  |                |                     |                 |                  |                 |           |                |                                      |  |                               |                  |  |     |      |
| NAME<br>K. R. Baker, Operations Department 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 NPRDS |                 | CAUSE            | SYSTEM          | COMPONENT | MANUFACTURER   | REPORTABLE TO NPRDS                  |  |                               |                  |  |     |      |
|   |        |  |                |                     |                 |                  |                 |           |                |                                      |  |                               |                  |  |     |      |
|   |        |  |                |                     |                 |                  |                 |           |                |                                      |  |                               |                  |  |     |      |
|   |        |  |                |                     |                 |                  |                 |           |                |                                      |  |                               |                  |  |     |      |
| 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 June 24, 1989, it was identified that the monthly channel checks required by T.S. 3.3.3.6, Table 3.3-10 for the containment water level instruments were not included in the applicable surveillance procedure. This resulted in four monthly channel checks not being performed as required. The channel check requirement was added by T.S. amendment number 95. The requirement to revise the applicable surveillance procedure was recognized when the amendment was reviewed, however the procedure revision was not completed due to a combination of oversight personnel errors. A similar condition existed for Unit 1, however the discrepancy was recognized prior to a missed surveillance.

The applicable surveillance procedures for Unit 1 and Unit 2 were revised on June 24, 1989, to implement the required channel checks. This event was discussed with the involved personnel to ensure that the proper method for tracking and completing T.S. amendment required procedure changes was understood.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104  
EXPIRES: 8/31/88

| FACILITY NAME (1)                | DOCKET NUMBER (2)             | LER NUMBER (6) |   |                      |   |                    |  | PAGE (3) |    |       |
|----------------------------------|-------------------------------|----------------|---|----------------------|---|--------------------|--|----------|----|-------|
|                                  |                               | YEAR           |   | SEQUENTIAL<br>NUMBER |   | REVISION<br>NUMBER |  |          |    |       |
|                                  |                               |                |   |                      |   |                    |  |          |    |       |
| D. C. Cook Nuclear Plant, Unit 2 | 0   5   0   0   0   3   1   6 | 8   9          | — | 0   1   2            | — | 0   0              |  | 0   2    | OF | 0   4 |

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

Conditions Prior to Occurrence

Unit 2 was in Mode 3 (Hot Standby).

Description of Event

On June 24, 1989, it was identified that the monthly channel checks required by T.S. 3.3.3.6, Table 3.3-10 for the containment water level instruments (EIIS/IP-LI) were not included in the applicable surveillance procedure. This discrepancy was discovered during the biennial review process for the Unit 2 daily and shift surveillance procedure.

The containment water level instrumentation was added to the Technical Specifications by amendment number 95 on December 10, 1987, with an effective date given as before the start up following the refueling outage which began in 1988. The unit entered Mode 3 on March 4, 1989, at which time the new requirement was effective. The channel calibration surveillance requirement was performed on February 10, 1989, and included channel checks. The next recorded channel check occurred on June 24, 1989, after the discrepancy was identified.

Amendment number 95 also added the containment sump level instrumentation (EIIS/IP-LI) to T.S. 3.3.3.6, Table 3.3-10 with the same effective date. The channel checks were not missed for this instrumentation however, because channel checks were being performed to ensure the instrumentation remained operable to meet the requirements of T.S. 3.4.6.1 for Reactor Coolant System leakage detection systems (EIIS/IJ-LI).

A similar condition existed in Unit 1, however there was no missed surveillance. The channel calibrations for the Unit 1 instrumentation, which included channel checks, were completed on June 5, 1989, and the T.S. requirement went into effect on June 24, 1989. Since the discrepancy was identified within thirty days of the last channel check, there was no missed surveillance.

There were no failed components which contributed to this event.

Cause of the Event

The requirement to add the channel checks to the applicable surveillance procedure was identified by the Operations Department when the amendment was reviewed prior to implementation. Normally a departmental action request is assigned to ensure required procedure changes are completed as scheduled, in this event however, the need to assign a departmental action request was

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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|                                  |                   | YEAR           | SEQUENTIAL NUMBER | REVISION NUMBER |  |          |    |     |
| D. C. Cook Nuclear Plant, Unit 2 | 0 5 0 0 0 3 1 6   | 8 9            | — 0 1 2           | — 0 0           |  | 0 3      | OF | 0 4 |

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

missed due to personnel error. The Technical Specification amendment review form was forwarded to the Technical Specification Amendment Coordinator. The coordinator entered the requirement for a procedure revision into the corporate action item tracking (AIT) system.

Normally the AIT system is redundant to the departmental action item tracking systems for Technical Specification amendments. In this event however, the AIT system was the only tracking system which listed the required procedure revision due to the failure to assign a departmental action request. The individual in the Operations Department responsible for tracking commitments, was relying on the departmental tracking system and did not adequately review the open items on the AIT system.

This event was caused by a combination of the failure to assign a departmental action request and failure to adequately review the AIT system open items.

#### Analysis of the Event

This event is considered reportable pursuant to 10 CFR 50.73 (a)(2)(i)(B).

The containment water level instrumentation was verified to be operable on February 10, 1989, when the channel calibrations were completed. The channel checks performed on June 24, 1989, found the instrumentation to be functioning as expected. It can be concluded that the containment water level instrumentation was capable of performing its design function during the involved time period.

In addition, it should be noted that the containment water level instrumentation indicators are immediately adjacent to the containment sump level instrumentation indicators. It is believed that any containment water level instrumentation abnormalities would have been identified during the performance of channel checks of the containment sump level instrumentation.

Based on the above it is concluded that this event did not involve an unreviewed safety question as defined in 10 CFR 50.59.

#### Corrective Action

The applicable surveillance procedure was revised on June 24, 1989, to implement the required channel checks of the containment water level instrumentation.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

| FACILITY NAME (1)                | DOCKET NUMBER (2)             | LER NUMBER (8) |                   |                 | PAGE (3) |    |       |
|----------------------------------|-------------------------------|----------------|-------------------|-----------------|----------|----|-------|
|                                  |                               | YEAR           | SEQUENTIAL NUMBER | REVISION NUMBER |          |    |       |
| D. C. Cook Nuclear Plant, Unit 2 | 0   5   0   0   0   3   1   6 | 8   9          | —   0   1   2     | —   0   0       | 0   4    | OF | 0   4 |

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

The involved individual in the Operations Department has been instructed on the importance of ensuring departmental action requests are assigned when needed and the importance of frequently reviewing the open items on the AIT system.

Failed Component Identification

None

Previous Similar Events

There were no previous similar events identified which involved identifying necessary procedure changes, but failing to implement the procedure changes.