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 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-015-00:on 890821,fire dampers inoperable w/o required compensatory action.

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September 19, 1989

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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:

89-015-00

Sincerely,

A.A. Blind
Plant Manager

AAB:clw

Attachment

cc: D.H. Williams, Jr.
A.B. Davis, Region III
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IE22
/1

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) Fire dampers inoperable without required compensatory action as a result of an erroneous inspection procedure.																
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)			
08	21	89	89	015	000	09	18	89	D. C. Cook - Unit 1				0 5 0 0 0 3 1 5			
OPERATING MODE (9) 1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)													
POWER LEVEL (10) 1 0 0			20.402(b)			20.405(c)			50.73(a)(2)(iv)			73.71(b)				
			20.406(a)(1)(i)			50.36(c)(1)			50.73(a)(2)(v)			73.71(c)				
			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)(ix)							
LICENSEE CONTACT FOR THIS LER (12)																
NAME J. B. Droste - Maintenance Superintendent										TELEPHONE NUMBER						
										AREA CODE 611 641 6151-15191011						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPD		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPD						
A	T C D M P	N / A	N													
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 August 21, 1989 an inoperable open fire damper subject to the constraints of Technical Specification 3.7.10 was found for which the action statement requirements had not been implemented. It had been inspected July 18, 1989, and was identified on a Task Sheet developed for preventive maintenance on dampers which were not subject to the Technical Specification. However, an error was made in identifying non-Technical Specification dampers during development of the Task Sheet and some Technical Specification dampers were incorrectly included. Technical Specification dampers were already included in a Quality Control procedure which contained necessary instructions. The Maintenance inspection overlapped the Quality Control inspection without containing pertinent information needed for Technical Specification dampers.

All Task Sheet Job Orders were reviewed. Two Unit 1 dampers were found which had already been repaired without action statement implementation. Four more Unit 1 dampers were found with open Job Orders. After identification of the Technical Specification dampers, the action statement was entered and repairs made. The Task Sheet was revised to delete Technical Specification dampers as originally intended.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

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 9	0 1 5	0 0	0 2	OF	0 3

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

CONDITIONS PRIOR TO OCCURANCE

Unit One - 100 percent thermal power

Unit Two - 100 percent thermal power

DESCRIPTION OF EVENT

On August 21, 1989, with Unit 2 operating at 100 percent reactor power a maintenance mechanic discovered that a fire damper (EIIS/DMP-KQ) he was to repair had not been declared inoperable, nor had a firewatch been established as required by Technical Specification 3.7.10 when the inoperable condition was identified. The Technical Specification also requires that dampers covered by its constraints be repaired within seven days or a special report submitted. The need for repair of fire damper 2-HV-ET-FD-3 in the Unit 2 reactor cable tunnel had been identified July 18, 1989, during an inspection by Maintenance personnel. They were using preventive maintenance Task Sheets which had been developed in March, 1989, with the intent to have Maintenance inspect dampers which were not covered by Technical Specification 3.7.10. Technical Specification dampers have all testing performed by the Quality Control department.

After the discovery, all Job Orders initiated as a result of Maintenance inspections were reviewed to identify any dampers covered by Technical Specification 3.7.10 that had been found to be inoperable. Two Unit 1 dampers were identified that had been repaired August 2, 1989, after being found inoperable on July 17, 1989 and four dampers were identified with Job Orders for repairs also initiated July 17 without the dampers having been declared inoperable and firewatches established. The Task Sheet utilized for Maintenance inspection of dampers was reviewed and those covered by Technical Specification 3.7.10 were deleted after it was verified the dampers were incorporated in the Quality Control inspection procedure for Technical Specification dampers.

In the case of the four dampers awaiting repair, firewatches were immediately established when the situation was identified and the Unit 1 control room advised of their inoperable status. Maintenance and Construction departments undertook repairs to return all to operable status.

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

CAUSE OF EVENT

The Technical Specification violations resulted from a misconception by the person who developed the Task Sheet for Maintenance inspections. The list for the Task Sheet had been developed from a data base sort of dampers identified as "non-safety related." It was incorrectly assumed that dampers which were not "safety related" would not be subject to Technical Specifications. When Job Orders were initiated as a result of the preventive maintenance inspection, dampers were identified as "non-Tech. Spec." based on information from the Task Sheet.

ANALYSIS OF EVENT

This event is considered reportable per the requirements of 10 CFR 50.73 (a) (2) (i) (B) as none of the dampers covered by Technical Specification 3.7.10 were declared inoperable, no firewatches were dispatched, repairs were not made within the seven-day time limit and required Special Reports were not submitted within the 30-day time limit. In each case, all fire loading zones where dampers were located are rated in the low to moderate range. Each zone is also protected by fire detection and/or suppression systems. In the event of fire, these factors combined with the availability of the plant fire brigade, would make it unlikely that a fire would spread beyond its point of origin.

CORRECTIVE ACTIONS

All dampers deleted were verified as being covered by an existing Quality Control procedure. The Task Sheet was thoroughly reviewed and revised to delete from Maintenance inspection those dampers covered by Technical Specification 3.7.10.