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 FACIL:50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
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 BLIND,A.A. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-011-00:on 890901,incomplete surveillance/retest
 schedule results in failure to conduct snubber retesting.
 W/8 ltr.

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616 465 5901



September 28, 1989

United States Nuclear Regulatory Commission
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Operating License DPR-58
Docket No. 50-315

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:

89-011-00

Sincerely,

A.A. Blind
Plant Manager

AAB:clw

Attachment

cc: D.H. Williams, Jr.
A.B. Davis, Region III
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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 OF 0 3										PAGE (3) 1 OF 0 3																					
TITLE (4) Incomplete surveillance/retest schedule results in failure to conduct Technical Specification required snubber retesting.																																									
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)								
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0 9 0			1 8			9 8			9			0 1			1			0 0			0 9			2 9			8 9									0 5 0 0 0					
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)									
		20.405(a)(1)(i)										50.38(c)(1)										50.73(a)(2)(v)										73.71(c)									
		20.405(a)(1)(ii)										50.38(c)(2)										50.73(a)(2)(vii)										OTHER (Specify in Abstract below and in Text NRC Form 366A)									
		20.405(a)(1)(iii)										X 50.73(a)(2)(i)										50.73(a)(2)(viii)(A)																			
		20.405(a)(1)(iv)										50.73(a)(2)(ii)										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. B. Droste - Maintenance 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 APRCS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO APRCS																															
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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 - e.g., approx. 1000 characters - 1 space typewritten line) (16)

On September 1, 1989, with Unit 1 operating at 100 percent thermal power, a Technical Specification snubber was identified which had not been tested as required following a previous failure to meet plant lockup velocity criteria. Snubber 1-GRC-S519, installed on the pressurizer spray line, had been tested in August, 1987. The as-found lockup velocity was 16.3 inches/minute compared to the plant established maximum of 15.1 inches/minute. Technical Specification 3/4.7.8 required re-test during the Unit 1 refuelling outage completed June 20, 1989. The snubber is inaccessible for inspection during power operation. The procedure controlling re-testing did not clearly delineate between normal inspections and mandated re-tests and the commitment was missed. After discovery, and based on the manufacturer's engineering evaluation, it was determined that the original test criteria were conservative and that the snubber would have functioned per design. A waiver from Technical Specification 3/4.7.8 was requested from the NRC September 1, 1989, and granted on that date.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0004

EXPIRES: 8-31-88

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 9	0 1 1	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 1 - 100 percent thermal power

Unit 2 - 100 percent thermal power

DESCRIPTION OF EVENT

On September 1, 1989, while reviewing the Unit 1 Technical Specification snubber maintenance history log, it was found that retesting of one snubber which was required due to a previous functional test failure had not been accomplished. The snubber had been completely rebuilt, tested and reinstalled following its initial, marginal, failure to meet the lockup velocity (in compression) specification of the manufacturer. Technical Specification 3/4.7.8 requires that selected snubbers which fail a functional test are required to be re-tested during the next test period. The initial failure of snubber 1-GRC-S519 (EIIS/SNB-AB) had occurred in August, 1987, and follow-up testing was required during the Unit 1 outage which was completed June 20, 1989. Because the Technical Specification contains a 72-hour action statement in the event a snubber is found inoperable, cold shutdown of Unit 1 would have been required by 0900 hours September 4, 1989.

A review of the initial failure of the snubber revealed that its lockup velocity, as-found, was 16.3 inches/minute while the plant established maximum was 15.1 inches/minute. The snubber's manufacturer indicated that a minimal increase in lockup velocity would not have a significant impact on dynamic response and that the snubber would have locked within system design requirements. Snubber 1-GRC-S519 is installed on a pressurizer spray line and is not accessible during power operation. Based on the evaluation of snubber test data, and because of a desire to avoid unnecessary thermal cycling of Unit 1, the plant requested a waiver of compliance from Technical Specification 3/4.7.8. This waiver was granted by the NRC in an emergency Technical Specification Amendment No. 128 (Sept 1, 1989).

In conjunction with the approved waiver, the plant committed to remove and test snubber 1-GRC-S519 the first time Unit 1 enters cold shutdown (Mode 5) or in conjunction with the scheduled ice condenser ice basket surveillance outage (scheduled for February, 1990), which ever occurs first.

CAUSE OF EVENT

The Maintenance snubber testing procedure required that the Test Supervisor obtain from Maintenance Engineering a list of snubbers requiring 24-month functional testing, and additionally, those needing retesting due to a

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-104
EXPIRES: 8/31 88

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 9	0 1 1	0 0	0 3	OF	0 3

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

CAUSE OF EVENT (CONTINUED)

previous failure. A single step in the procedure is utilized to specify this dual requirement. Prior to snubber testing, the cognizant engineer included a list of snubbers to be tested on the testing job order. He failed to include retest snubbers in this list. The Test Supervisor believed the list covered all required testing, therefore the listed work was completed, signed off, and believed to be complete.

ANALYSIS OF EVENT

Snubber 1-GRC-S519 was visually inspected and declared operable but was not functionally tested. This event is considered reportable per the requirements of 10 CFR 50.73 (a) (2) (i) (B) as Unit 1 entered power operation with one snubber inoperable due to the failure to perform retesting mandated by the Technical Specifications. Upon discovery of the lack of retest, the snubber was declared inoperable and the 72-hour action statement required by Technical Specification 3.7.8 was entered. A review of the manufacturers technical reports indicated that the worst case locking velocity has a considerable safety factor which would permit lockup at velocities greater than the 1987 as-found 16.3 inches/minute. The 1987 rebuild and test of the snubber was based on the plant's maintenance philosophy rather than a concern that the snubber would fail to lockup after adjustment. Since 1979, 115 functional tests have been performed on all of the plant's Technical Specification snubbers. In that time frame 111 (97 percent) successfully passed the tests. Testing was performed as a result of schedules developed per manufacturer's recommendations as well as those necessitated by visual inspection or operator concern. Those snubbers having been rebuilt or repaired since 1979 had subsequently been retested with satisfactory results.

CORRECTIVE ACTIONS

A change to the plant procedure was initiated to create two separate steps, each requiring a signoff by the cognizant engineer. The use of "not applicable" in any section of the procedure will require approval and initials by the cognizant engineer.

FAILED COMPONENT IDENTIFICATION

Pipe snubber
Plant Designation: 1-GRC-S519
Manufacturer: Grinnel
EIIS Code: SNB-AB

PREVIOUS EVENTS

None