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 AUTH. NAME AUTHOR AFFILIATION
 WIEBE, J.S. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 BLIND, A.A. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-009-00: on 921122, MSIV technically determined to be inoperable due to interpretation of TS 3.7.1.5. TS will be revised to clarify LCO & SRs to address mode changes w/ closed MSIVs. W/921221 ltr.

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Indiana Michigan
Power Company
Cook Nuclear Plant
One Cook Place
Bridgman, MI 49106
616 465 5901



December 21, 1992

United States Nuclear Regulatory Commission
Document Control Desk
Rockville, Maryland 20852

Operating Licenses DPR-74
Docket No. 50-316

Document Control Manager:

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

92-009-00

Sincerely,

A. A. Blind
Plant Manager

/sb

Attachment

c: D. H. Williams, Jr.
A. B. Davis, Region III
E. E. Fitzpatrick
P. A. Barrett
R. F. Kroeger
B. Walters - Ft. Wayne
NRC Resident Inspector
W. M. Dean - NRC
J. G. Keppler
M. R. Padgett
G. Charnoff, Esq.
D. Hahn
INPO
S. J. Brewer
B. A. Svensson

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

D. C. Cook Nuclear Plant - Unit 2

DOCKET NUMBER (2)

0 5 0 0 0 3 1 6 1 OF 0 5

PAGE (3)

TITLE (4)

Mode Change with Technically Inoperable Main Steam Isolation Valves.

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	2	2	9	2	9	2	0	0	9	0	5	0	0	0		
1	1	2	2	9	2	9	2	0	0	1	2	2	1	9	2		
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)															
2																	
POWER LEVEL (10)		0 0 0															
		20.402(b)															
		20.405(a)(1)(i)															
		20.405(a)(1)(ii)															
		20.405(a)(1)(iii)															
		20.405(a)(1)(iv)															
		20.405(a)(1)(v)															
		20.405(e)															
		50.38(c)(1)															
		50.38(c)(2)															
		50.73(a)(2)(i)															
		50.73(a)(2)(ii)															
		50.73(a)(2)(iii)															
		50.73(a)(2)(iv)															
		50.73(a)(2)(v)															
		50.73(a)(2)(vi)															
		50.73(a)(2)(vii)															
		50.73(a)(2)(viii)(A)															
		50.73(a)(2)(viii)(B)															
		50.73(a)(2)(ix)															

LICENSEE CONTACT FOR THIS LER (12)

NAME

J. S. Wiebe, Safety and Assessment 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)

YES (If yes, complete EXPECTED SUBMISSION DATE)

X NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On November 22, 1992 at 0021 hours an UNUSUAL EVENT was declared as a result of entering a Technical Specification 3.0.3 condition on Unit Two. The 3.0.3 entry was made based on a determination that although the Main Steam Isolation Valves (MSIVs) were tagged closed for turbine generator maintenance, they were technically INOPERABLE as a result of not having current stroke time surveillances. A Unit Two shutdown from MODE 2 to MODE 3 was commenced upon determination of the valves INOPERABLE status. The Plant entered MODE 3 at 0032 hours on November 22, 1992

The S/G stop valves were considered INOPERABLE as a result of the surveillance requirements contained in plant surveillance procedures (to verify that the stop valves close in less than 8 seconds) not being performed within the last 92 days. This test had last been completed on June 13 and June 14 of this year. No maintenance had been performed on these valves since last tested.

Although the mode change to MODE 2 was a condition prohibited by a conservative literal Technical Specifications interpretation, the condition had no safety significance. Additionally, since the MSIVs were in the position required for them to perform their intended safety function, the plant was never in a Technical Specification 3.0.3 condition.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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

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

Conditions Prior to Occurrence:

Unit One in Mode 1 (Power Operation) at 55% rated thermal power.

Unit Two in Mode 2 (Startup) at approximately 10E-7 amps.

Description of Event:

On November 22, 1992 at 0021 hours an UNUSUAL EVENT was declared as a result of entering a Technical Specification 3.0.3 condition on Unit Two. The 3.0.3 entry was made based on a determination that although the Main Steam Isolation Valves (EIIS: SB/ISV) (MSIVs) were tagged closed for turbine generator (EIIS: TA/GEN) maintenance, they were technically INOPERABLE as a result of not having current stroke time surveillances. A Unit Two shutdown from MODE 2 to MODE 3 was commenced upon determination of the valves INOPERABLE status.

The Main Steam Isolation valves (EIIS: SB/ISV) were considered INOPERABLE as a result of the surveillance requirements contained in plant surveillance procedures (to verify that the MSIVs (EIIS: SB/ISV) close in less than 8 seconds) not being performed within the last 92 days. This test had last been completed on June 13 and June 14 of this year. No maintenance had been performed on these valves since last tested.

On November 21, 1992 a review was conducted to determine if Unit Two could enter MODE Two in preparation for turbine roll. Part of this review included a determination of Technical Specifications which would be impacted by the Mode Change. One of the Technical Specifications affected is 3.7.1.5, which deals with the Main Steam Isolation Valves (EIIS: SB/ISV). It was identified that the Technical Specification allowed for entry into MODE 2 for physics testing with the surveillance not current provided the MSIVs (EIIS: SB/ISV) were maintained in the closed position. While all low power physics testing had been completed, it was determined to be allowable (satisfying the intent of the Technical Specification) to enter MODE 2 with the surveillance not current as long as the MSIVs (EIIS: SB/ISV) were maintained in the closed position.

Plant administrative guidance requires the tracking of MODE changes made when component/system surveillances are not current. With respect to the MSIVs (EIIS: SB/ISV) this fact was recognized and the required documentation, PMI-4030 (Technical Specification Review and Surveillance) Attachment #6 (Authorization to Change Modes With Technical Specification Equipment Out Of Service), was completed and approved by the acting Operations Department Superintendent and an Assistant Plant Manager. PMI 4030 Att. #6, to allow entry into mode 2, was approved based on the knowledge that the intent of the MSIV (EIIS: SB/ISV) time closed surveillance is to ensure the MSIVs (EIIS: SB/ISV) close to minimize the effects of a steam break accident. At the time of the mode change the MSIVs (EIIS: SB/ISV) were closed and tagged closed under a clearance permit to provide protection for work in progress on the main generator (EIIS: TA/GEN).

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

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D. C. Cook Nuclear Plant - Unit 2

YEAR SEQUENTIAL REVISION

NUMBER NUMBER NUMBER

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

Description of Event (cont.)

Based on the guidance provided on Attachment 6, entry into MODE 2 was made on November 21, 1992 at 2112 hours.

Following the mode change, the Shift Supervisor commenced a review of the activities performed for entry into MODE 2. As part of his review, he re-evaluated the transition into MODE 2 with the MSIVs (EIIS: SB/ISV) INOPERABLE. At this time, he determined that changing modes with all four MSIVs (EIIS: SB/ISV) inoperable was not in literal compliance with the ACTION STATEMENT for Technical Specification 3.7.1.5. Upon determination of this finding, the Shift Supervisor contacted Operations Department Management and relayed his concerns and interpretation of the Technical Specification. Following discussions with Operations Department Management, it was concluded that a conservative approach would be to consider the unit in a Technical Specification 3.0.3 condition and perform a shutdown into MODE 3 (Hot Standby).

At 0021 hours on November 22, 1992 the Shift Supervisor declared an UNUSUAL EVENT (as a result of the unit considered being in a Technical Specification 3.0.3 condition) and made a 1 hour report to the NRC Operations Center in accordance with 10CFR 50.72(b)(1)(i)(A). MODE 3 was entered at 0032 hours on November 22, 1992.

Cause of Event:

This event was the result of an interpretation of Technical Specification 3.7.1.5 by the acting Operations Superintendent, a Shift Supervisor and an Assistant Plant Manager to allow entry into MODE 2 by meeting the intent of the specification. This interpretation resulted in the failure to meet the literal requirements of the specification.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 600 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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

Analysis of Event:

This event is considered reportable pursuant to 10CFR 50.73(a)(2)(i)(B), Any operation or condition prohibited by the plant's Technical Specifications. The failure to surveil the main steam isolation valves prior to entry into MODE 2 resulted in a violation of the Plant Technical Specifications.

A review of the safety significance determined that there was no safety significance associated with the plant being in MODE 2 with the MSIVs closed and the surveillance not performed. Technical Specification 4.7.1.5.3 clearly allows this condition during PHYSICS TESTING with the provision that the valves are maintained closed. It is apparent that although the mode change to MODE 2 was a condition prohibited by a conservative literal Technical Specifications interpretation, the condition had no safety significance. Additionally, since the MSIVs were in the position required for them to perform their intended safety function, a Technical Specification 3.0.3 did not exist.

A contributing factor to this event was a weakness of the process to independently review Technical Specifications and surveillances outstanding, prior to the MODE change. A review of the process revealed that although a mode change prohibited by Technical Specifications was allowed to occur, safety significance was of prime consideration by the operating shift and management review of the decision to proceed to MODE 2 as required by the process. The process is not considered deficient from a safety significance standpoint.

The main steam isolation valves were maintained closed for the entire period of this event. In the closed position they were performing their intended safety function. As a result, this event had no impact on the health and safety of the public.

CORRECTIVE ACTION

After the Shift Supervisor determined that the mode change to MODE 2 was made in error, the unit was placed in MODE 3.

To prevent recurrence of this event, the following actions will be taken:

Technical Specification 3.7.1.5 will be revised to clarify the Limiting Conditions for Operation and the surveillance requirements to address mode changes with closed MSIVs. Both the Unit One and Two specifications will be addressed to ensure consistency.

The PMI-4030 process will be enhanced to delineate specific independent reviews which must be accomplished prior to authorization for mode changes with Technical Specification equipment inoperable or with surveillance in grace or expired.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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

Failed Component Identification:

There were no failed components associated with this condition.

Previous Similar Events:

None