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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9212300122 DOC. DATE: 92/12/23 NOTARIZED: NO DOCKET #  
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315  
 AUTH. NAME AUTHOR AFFILIATION  
 WIEBE, J.S. Indiana Michigan Power Co.  
 BLIND, A.A. Indiana Michigan Power Co.  
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-010-01: on 920812, determined that section of thermo-lag 330 had not been included in fire watch posting, due to inadequate or misleading info in surveillance procedure. Plant procedures & design changes revised. W/921223 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5  
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

## NOTES:

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INTERNAL:	ACNW	2 2	AEOD/DOA	1 1
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	NRR/DET/EMEB 7E	1 1	NRR/DLPQ/LHFB10	1 1
	NRR/DLPQ/LPEB10	1 1	NRR/DOEA/OEAB	1 1
	NRR/DREP/PRPB11	2 2	NRR/DST/SELB 8D	1 1
	NRR/DST/SICB8H3	1 1	NRR/DST/SPLB8D1	1 1
	NRR/DST/SRXB 8E	1 1	REG FILE 02	1 1
	RES/DSIR/EIB	1 1	RGN3 FILE 01	1 1
EXTERNAL:	EG&G BRYCE, J.H	2 2	L ST LOBBY WARD	1 1
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10-4  
26p

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



December 23, 1992

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

Operating Licenses DPR-58  
Docket No. 50-315

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:

92-010-01

Sincerely,

A handwritten signature in cursive script that reads 'A. A. Blind'.

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

300027

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PDR ADOCK 05000315  
S PDR

Handwritten initials 'J.E.' followed by a vertical line and the number '1/1'.

## LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 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 1

DOCKET NUMBER (2)

0 5 0 0 0 3 1 5

PAGE (3)

1 OF 0 4

TITLE (4) Missed Surveillance Due to the Use of Obsolete Documentation  
in Support of Thermo-Lag 330 Inspections

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
0	8	1	2	9	2	0	1	0	D. C. Cook - Unit 2
0	8	1	2	9	2	0	1	1	
2	9	2	0	1	0	0	1	1	
2	9	2	0	1	1	2	2	3	
9	2					9	2		

DOCKET NUMBER(S)

0 5 0 0 0 3 1 6

0 5 0 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

OPERATING MODE (9)	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)
6	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 Joel S. Wiebe - Safety and Assessment Superintendent

TELEPHONE NUMBER

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)

YES (If yes, complete EXPECTED SUBMISSION DATE) ☒ NO ☐

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

This supplemental report is being submitted to reflect the results of the completed review of Thermo-Lag 330 documentation in response to this event.

In response to NRC bulletin 92-01, fire watches were established in all areas of the plant where Thermo-Lag 330 was identified as having been installed. On August 12, 1992, following a preliminary review by the Appendix R Coordinator to ensure that all Thermo-Lag 330 was being patrolled by the fire watch personnel, it was determined that a section of Thermo-Lag 330, which enclosed a conduit in the Unit-2 Blowdown Flash Tank area, had not been included in the fire watch posting. It was further determined that the Thermo-Lag 330 at that location had not been included in the surveillance program for fire barriers as required by Technical Specification 3/4.7.10 due to obsolete documentation being utilized for that surveillance.

The immediate corrective action taken was the establishment of a fire watch for the area.

In an effort to ensure that there was no other Thermo-Lag 330 installed in the plant which has not been included in the surveillance program, all available drawings and previous surveillances were researched. No additional violations were identified.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-830), 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 1	DOCKET NUMBER (2)  0   5   0   0   0   3   1   5	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9   2	-   0   1   0	-   0   1	0   2	OF	0   4

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

Conditions Prior to Occurrence

Unit 1 (U-1) - in Mode 6 (Refueling)

Unit 2 (U-2) - in Mode 5 (Cold Shutdown)

Description of Event

In response to NRC bulletin 92-01, fire watches were established in all areas of the plant where Thermo-Lag 330 (EIIS:JL/CND:ISL) was identified as having been installed. On August 12, 1992, following a preliminary review by the Appendix R Coordinator to ensure that all Thermo-Lag 330 (EIIS:JL/CND:ISL) was being patrolled by the fire watch personnel, it was determined that a section of Thermo-Lag 330 (EIIS:JL/CND:ISL), which enclosed a conduit in the Unit-2 Blowdown Flash Tank (EIIS:WI/TK) area, had not been included in the fire watch posting. It was further determined that the Thermo-Lag 330 (EIIS:JL/CND:ISL) at that location had not been included in the surveillance program for fire barriers as required by Technical Specification 3/4.7.10.

The immediate corrective action taken was the establishment of a fire watch for the area.

As a result of this initial finding, the Safety & Assessment Quality Control Supervisor performed an investigation of all available drawings, records and previous surveillances to ensure that there was no other Thermo-Lag 330 (EIIS:JL/CND:ISL) installed in the plant that was not included in the surveillance program. While performing this investigation, one additional area of Thermo-Lag 330 (EIIS:JL/CND:ISL) was noted as not being included in the surveillance program. This section of Thermo-Lag 330 (EIIS:JL/CND:ISL) was installed via a design change in September of 1990, in Fire Zone 24 (EIIS:IC/DET). A fire watch had already been posted in this fire zone (EIIS:IC/DET) during the original response to NRC Bulletin 92-01. A subsequent inspection of the Thermo-Lag 330 (EIIS:JL/CND:ISL) installation determined the fire barrier to be in acceptable condition per the surveillance inspection requirements. Given the time frame from installation to the date when compensatory actions were in affect it was determined that the surveillance requirements for this installation had not been violated.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), 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 1	DOCKET NUMBER (2)  0 5 0 0 0 3 1 5	LER NUMBER (6)			PAGE (3)		
		YEAR 9 2	SEQUENTIAL NUMBER 0 1 0	REVISION NUMBER 0 1			

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

Cause of Event

Inadequate and/or misleading information in the surveillance procedure was the cause of the failure to include the identified section of Thermo-Lag 330 in the surveillance program. The plant procedure which directed the surveillance of Thermo-Lag 330, stated "... personnel assigned to perform the surveillance shall perform the inspection utilizing initial installation reports, previous surveillances, applicable electrical drawings and any other associated information". This statement does not clearly define the scope of the surveillance and actually directed personnel to use information which had been compiled over a period of years. While plant instructions exist which require the use of the most current documents to perform work, the wording in the surveillance procedure could be interpreted to be inconsistent with this requirement.

Since the surveillance procedure used a vague statement to identify the scope of the inspection, there was no obvious impact to the surveillance program when design changes for Thermo-Lag installations took place. The individual who performed the impact review for the particular design change which installed the Thermo-Lag 330 at the location being discussed was not aware of the impact that this addition would have on the surveillance program. Regardless of that fact, had the inspector obtained the latest revision of the drawing being utilized for the inspection, all of Thermo-Lag 330 identified on the drawing would have been included in the surveillance.

Analysis of Event

This report is being submitted in accordance with 10CFR50.73, paragraph (a)(2)(i)(B) as an event that violated Technical Specifications.

Based on fire loading in Fire Zone 22, the BTU/sq. ft. released by complete combustion of all combustibles in the zone is very low (equivalent fire severity of .8 minutes). This makes it highly unlikely that a fire in zone 22 would result in damage to the cable unless major defects existed in the Thermo-Lag 330 wrap. The required surveillance inspection of the affected conduit section, performed as a part of the immediate action for the event, revealed no problems with the Thermo-Lag 330 wrap. Therefore, it is concluded that the event did not adversely impact the health and safety of the public.

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 1	DOCKET NUMBER (2)  0   5   0   0   0   3   1   5	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9   2	-   0   1   0	-   0   1	0   4	OF	0   4

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

Corrective Actions

As a result of the research for this event, a complete listing of all known Thermo-Lag 330 installations has been compiled. This information has been included in a revision to the surveillance procedure.

As a result of other concerns and problems not related to this event, the plant created and staffed a position of Site Appendix R Coordinator in 1991. The plant procedures, for design changes, have been revised to include additional reviews by the Appendix R Coordinator to enhance the impact reviews performed on changes related to the Plant Fire Protection program. In addition, the plant has a much greater awareness of the Plant Fire Protection requirements than it did when the affected portion of Thermo-Lag 330 was originally installed. We are confident that similar errors relative to design impact reviews will be prevented.

Failed Components Identified

None

Previous Similar Events

None