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 FACIL:50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316
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 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-009-01:on 921122,MSIVs technically inoperable as
 result of failure to conduct current stroke time
 surveillances.Caused by allowing entry into Mode 2 w/MSIVs
 closed.Rev to MSIV TS will be requested.W/930604 ltr.

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June 4, 1993

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:

92-009-01

Sincerely,

A. A. Blind
Plant Manager

/sb

Attachment

c: A. B. Davis, Region III
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9306110269 930604
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S PDR

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) Donald C. Cook Nuclear Plant - Unit 2																		DOCKET NUMBER (2) 0 5 0 0 0 3 1 1 6										PAGE (3) 1 OF 0 5							
TITLE (4) Main Steam Isolation Valve Surveillance Requirement Interpretation Leads To Unit Shutdown																																			
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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1 1		2 2		9 2		9 2		0 0 9		0 1		0 6		0 4		9 3											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)																															
2				20.402(b)						20.405(c)						50.73(a)(2)(iv)						73.71(b)													
POWER LEVEL (10)				20.406(a)(1)(i)						50.36(c)(1)						50.73(a)(2)(v)						73.71(c)													
0 0 0				20.406(a)(1)(ii)						50.36(c)(2)						50.73(a)(2)(vii)						X OTHER (Specify in Abstract below and in Text, NRC Form 366A)													
				20.406(a)(1)(iii)						50.73(a)(2)(i)						50.73(a)(2)(viii)(A)						Voluntary													
				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)																		TELEPHONE NUMBER																	
NAME																		AREA CODE																	
J.S. Wiebe - Safety and Assessment Superintendent																		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 NPROS				CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NPROS															
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)

This revision is being submitted to update the reporting classification, cause, and analysis of the reported event. Based on subsequent reviews, this event is no longer being reported as a condition prohibited by the technical specifications, but is being voluntarily reported based on its potential generic interest.

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 were tagged closed for turbine generator maintenance, the valves were technically inoperable as a result of not having current stroke time surveillances. A Unit 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 and exited 3.0.3.

Subsequent reviews of the technical specifications, ASME Code requirements and system configuration revealed that the valves were performing their intended safety function and that the stroke time surveillances were not required until the Main Steam System was to be placed in service. Based on the subsequent reviews, there was no violation of the technical specifications and the event was determined to be not reportable.

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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Donald C. Cook
Nuclear Plant - Unit 2

0 5 0 0 0 3 1 6

YEAR	SEQUENTIAL NUMBER	REVISION NUMBER
92	009	01

02 OF 05

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

This revision is being submitted to update the cause, analysis and reporting classification of the event. Based on subsequent review, this event is no longer being reported as a condition prohibited by the technical specifications, but is being voluntarily reported based on its potential generic interest.

CONDITIONS PRIOR TO OCCURRENCE

Unit Two in Mode 2 (Startup) at 10E-7 amps on the intermediate range nuclear channels

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) 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 (MSIVs) were considered inoperable as a result of the surveillance requirements contained in plant surveillance procedures (to verify that the MSIVs 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 2 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. It was identified that the Technical Specification allowed for entry into Mode 2 for physics testing with the surveillance not current provided the MSIVs 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 were maintained in the closed position.

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-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)

Plant administrative guidance requires the tracking of Mode changes made when component/system surveillances are not current. With respect to the MSIVs 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 Attachment #6, to allow entry into Mode 2, was approved based on the knowledge that the intent of the MSIV time closed surveillance is to ensure the MSIVs close to minimize the effects of a steam break accident. At the time of the mode change the MSIVs were closed and tagged under a clearance permit to provide protection for work in progress on the main generator.

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 tagged closed. At this time, he determined that changing modes with all four MSIVs not having their surveillance current 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 10CFR50.72(b)(1)(i)(A). Mode 3 was entered at 0032 hours on November 22, 1992.

CAUSE OF EVENT

This event was the result of allowing entry into Mode 2, with the main steam line isolation valves closed and main steam system removed from service to facilitate work on the main generator, without providing justification for exceeding a 92 day surveillance requirement.

LICENSEE EVENT REPORT (LER)
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ANALYSIS OF EVENT

This event is being voluntarily reported as it might be of generic interest demonstrating the intricate relationship between the technical specifications and ASME Code requirements.

Based on the surveillance requirement interpretation by the Shift Supervisor, indirectly using ASME Code IWV-3411 through technical specification reference to 4.0.5, all four main steam isolation valves were declared inoperable. ASME Code IWV-3411 requires that the valves be exercised every 92 days. The valves were last tested June 13th and 14th, 1992. All valves were declared inoperable as they had not been surveilled in the last 92 days. The specification for the main steam isolation valves does not provide action for four inoperable valves. For those circumstances not directly provided for in an action statement and whose occurrence would violate the intent of a specification the measures to be taken are delineated in specification 3.0.3. Specification 3.0.3 requires that within one hour action shall be initiated to place the unit in a Mode in which the Specification does not apply and provides a limiting time table for obtaining the appropriate mode. The main steam isolation valve specification has provisions for operation in Mode 3 with four isolation valve that have not been surveilled through an exemption to 4.0.4 for entry into Mode 3. Once the unit was placed in the Mode 3, specification 3.0.3 was exited.

Further review of ASME Code IWV-3411 revealed that the valves are to be exercised at least every 3 months (92 days), except as provided by IWV-3412(a), IWV-3415 and IWV-3416. Review of ASME Code IWV-3416 reveals that: "For a valve in a system declared inoperable or not required to be operable, the exercising test schedule need not be followed. Within 30 days prior to return of the system to operable status, the valves shall be exercised and the schedule resumed in accordance with requirements of this article."

Based on the main steam system being out of service to facilitate work on the main generator, article IWV-3416 applies to the periodicity of the surveillance test and there was no violation of the technical specifications. Also, based on the start-up procedure requirement to test the Main Steam Isolation Valves (MSIVs) and the administrative tracking of the MSIV's status, controls were sufficient to ensure the valves would be tested prior to declaring the main steam system operable. Actual testing of the MSIVs occurred on November 30, 1992, before Unit 2 was again placed in Mode 2.

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The process failure which allowed the mode change without clear consideration of the ASME requirements was reviewed. A review of the process revealed that 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 standpoint.

Based on the fact that the technical specifications were not violated and there was no safety significance this event did not pose a threat to the health and safety of the public.

CORRECTIVE ACTION

Based on the surveillance requirement interpretation, all four main steam isolation valves were declared inoperable and the unit was taken to Mode 3 (Hot Standby).

To prevent recurrence the procedure controlling the authorization to change modes with technical specification equipment out of service was revised to delineate specific independent reviews to be accomplished prior to authorizing a mode change with technical specification equipment inoperable or with surveillance in grace or expired.

In addition, a revision to the main steam isolation valve technical specification will be requested to clarify the Limiting Conditions for Operation and the surveillance requirements to address mode changes with closed main steam isolation valves.

FAILED COMPONENT IDENTIFICATION

None

PREVIOUS SIMILAR EVENTS

None