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 BLIND, A.A.      Indiana Michigan Power Co. (formerly Indiana & Michigan Ele  
 RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: LER 94-002-00: on 940430, fire watch tour was omitted due to personnel error. Revised policy for implementing fire watch tour. W/940531 ltr.

DISTRIBUTION CODE: IE22T      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: S  
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Indiana Michigan  
Power Company  
Cook Nuclear Plant  
One Cook Place  
Bridgman, MI 49106  
616 465 5901



May 31, 1994

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:

94-002-00

Sincerely,

A. A. Blind  
Plant Manager

/sb  
Attachment

c: J. B. Martin, Region III  
E. E. Fitzpatrick  
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INPO  
S. J. Brewer

## LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, 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)

05000 316

PAGE (3)

1 OF 3

TITLE (4)

FIRE WATCH TOUR OMITTED DUE TO PERSONNEL ERROR

EVENT DATE (5)			LER NUMBER (6)			REPORT NUMBER (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
04	30	94	94	-- 002 --	00	05	31	94	FACILITY NAME	DOCKET NUMBER
										05000
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
1			20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)	
POWER LEVEL (10)			20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)	
063			20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER	
			20.405(a)(1)(iii)		X 50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)	
			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)(x)			

## LICENSEE CONTACT FOR THIS LER (12)

NAME: W. M. HODGE - PLANT PROTECTION SUPERINTENDENT  
TELEPHONE NUMBER (Include Area Code): 616-465-5901

## 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)

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

YES

(If yes, complete EXPECTED SUBMISSION DATE)

X

NO

## ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On 01-21-94 at 1015, Fire Door 2-DR-AUX344 for the 609' elevation (elev.) of the Turbine (Tur.) Building (Bldg.) was declared inoperable (which rendered the CO<sub>2</sub> suppression system for Fire Zones 46A, 46B 46C and 46D inoperable). Technical Specifications (TS) 3.7.9.3 and 3.7.10 required Action items were established. On 04-29-94 at 2308 an hourly FW toured the above described area. A shift turnover occurred at 2315 in which the tour point was omitted from the newly created tour sheet. The TS (3.7.9.3 and 3.7.10) required tour did not occur again until recognized and questioned by FW personnel to the FW Supervisor on 04-30-94 at 0030. The FW Supervisor recognized that the TS 3.7.9.3 and 3.7.10 action statements were not being met and contacted FW personnel and had the tour point added to the tour. A tour of the area was conducted on 04-30-94 at 0037. The U-2 4Kv CO<sub>2</sub> system for Fire Zones (FZ) 46A, 46B, 46C and 46D, and Fire Door 2-DR-AUX344 were inoperable without a hourly FW for 1 hour 26 minutes.

The policy for implementing fire watch tour sheets has been revised to require a review and then an independent review prior to use. This event was discussed and reviewed with the personnel involved.

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 (6)			PAGE (3)		
		YEAR 9 4	SEQUENTIAL NUMBER 0 0 2	REVISION NUMBER 0 0			

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

Description of Event

On 01-21-94 at 1015, Fire Door 2-DR-AUX344 (EIIS/NM-DR) for the 609' elevation (elev.) of the Turbine (Tur.) Building (Bldg.) was declared inoperable (this door was inoperable because the area's ventilation system has made impossible for the door to completely close). This door also made the CO<sub>2</sub> system for the lower elev. of the 4Kv room inoperable (FZs 46A, 46B, 46C and 46D). The CO<sub>2</sub> system was not designed to allow for perimeter leakage of this magnitude (10' by 12' = 120sq ft.) to effectively extinguish the fire. A roving fire watch (FW) patrol was established to tour the affected fire zones and Fire Door 2-DR-AUX344 as required by Technical Specifications (TS) 3.7.9.3 and 3.7.10 (U-2).

On 04-29-94 at 2308 a FW toured the above described area. A shift turnover occurred in which the tour point was omitted from the newly created tour sheet. The TS (3.7.9.3 and 3.7.10) required tour did not occur again until recognized and questioned by FW personnel to the FW Supervisor on 04-30-94 at 0030. The FW Supervisor recognized that the TS action statements were not being met and contacted FW personnel and had the tour point added to the tour. A tour of the area was conducted on 04-30-94 at 0037.

Cause of Event

The cause of this event was personnel error. The involved FW Supervisor failed to review the FW tour sheets upon completion, prior to the tours being conducted. This review would have identified all tour points were not incorporated onto the tour sheets for the shift.

Analysis of Event

The TS 3.7.9.3 action statement for an inoperable required CO<sub>2</sub> system requires that "...within 1 hour: 1) verify at least one zone of fire detection for the affected area is OPERABLE per Specification 4.3.3.8, and establish a fire watch patrol to inspect the affected area once per hour, or 2) Establish a continuous fire watch to patrol the affected area."

The TS 3.7.10 action statement for an inoperable fire rated assembly requires that "... within 1 hour: 1) verify that the fire detectors and/or fire suppression system on at least one side of the inoperable assembly are OPERABLE and establish an hourly fire watch patrol, or 2) establish a continuous fire watch patrol on one side of the penetration..."

Failure to maintain an hourly FW patrol was a violation of TS 3.7.9.3 and 3.7.10 and is reportable under 10 CFR 50.73(a)(2)(i)(B).

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

D. C. COOK NUCLEAR PLANT

0 5 0 0 0 3 1 6 9 4 - 0 0 2 - 0 0 0 3 OF 0 3

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

Analysis of Event (cont'd)

The U-2 4Kv CO<sub>2</sub> system for FZs 46A, 46B, 46C and 46D, and Fire Door 2-DR-AUX344 were inoperable without a hourly FW patrol for 1 hour 26 minutes. The analysis of this event concludes that in the unlikely event of a fire, personnel would have been promptly aware of its presence and would have extinguished the fire without significant spreading of the fire or equipment damage. This conclusion is based on the following:

1. The detection for FZs 46A, 46B, 46C and 46D were in an operable state, in the event of a fire, the detectors would have alarmed in the U-2 Control Room, which is manned 24 hours a day, this alarming condition would have been investigated and the appropriate Fire Brigade resources would have been dispatched to mitigate the fire.

Although an hourly FW patrol was not conducted for a 1 hour 26 minute period, it is concluded that the alarms/detection associated with affected fire zones would have allowed timely identification of a fire. Therefore, this event is not considered to have created a significant safety concern, nor did it create a significant hazard to the health and safety of the general public.

Corrective Actions

1. When the FW Supervisor was made aware of the omission of the tour point, the tour point was added and the affected area/equipment immediately toured for compliance with TS 3.7.9.3 and 3.7.10.
2. This event was discussed with the involved personnel. The personnel are fully aware of the TS 3.7.9.3 and 3.7.10 requirements of an hourly FW patrol for an inoperable CO<sub>2</sub> system and fire rated assembly, respectively.
3. Prior issuing Fire Watch tours sheets for implementation, they are now reviewed and independently reviewed to ensure accuracy.

Previous Similar Events

None