

PRIORITY 1

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ACCESSION NBR: 9408170033 DOC. DATE: 94/08/09 NOTARIZED: NO DOCKET #
FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
AUTH. NAME AUTHOR AFFILIATION
BEILMAN, T.P. 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 94-010-00: on 940502, missed containment personnel access
door surveillance due to inadequate administrative controls.
Two suspect personnel access doors inspected prior to mode
ascension on 940524 & found to be operable. W/940809 ltr.

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TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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



August 9, 1994

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:

94-010-00

Sincerely,

A. Alan Blind
A. A. Blind
Plant Manager

/sb

Attachment

c: J. B. Martin, Region III
E. E. Fitzpatrick
P. A. Barrett
R. F. Kroeger
M. A. Bailey - Ft. Wayne
NRC Resident Inspector
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9408170033 940809
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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)

Donald C. Cook Nuclear Plant

DOCKET NUMBER (2)

05000315

PAGE (3)

1 OF 03

TITLE (4) Missed Containment Personnel Access Door Surveillance Due To Inadequate Administrative Controls

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
05	02	94	94	010	00	08	09	94	FACILITY NAME	DOCKET NUMBER
										05000
										05000
OPERATING MODE (9)		5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		0	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)	
			20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)	
			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 368A)	
			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

T. P. Beilman - Maintenance Superintendent

TELEPHONE NUMBER (Include Area Code)

(616) 465-5901 ext. 2601

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)

YES

(If yes, complete EXPECTED SUBMISSION DATE)

X NO

EXPECTED
SUBMISSION
DATE (15)

MONTH DAY YEAR

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

Plant technical specifications on Divider Barrier Personnel Access Doors and Equipment Hatches requires that the personnel access doors and equipment hatches between the containment's upper and lower compartments shall be determined operable by visual inspection prior to final closure of the penetration each time it has been opened. As a result of inadequate administrative controls to ensure and document compliance with this specification it could not be determined if the surveillance had been met for two Unit 1 personnel access doors on May 2, 1994 when a mode change was made from mode 5 to mode 4. Due to the inability to demonstrate compliance with the surveillance and knowledge that the doors had been opened it was concluded that the surveillance requirement was missed.

The two suspect personnel access doors were inspected prior to mode ascension on May 24, 1994 and found to be operable. Administrative controls will be enhanced to ensure compliance and documentation of the subject surveillance requirement.

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

Description of Event

On May 24, 1994, in preparation for a mode change from mode 5 to mode 4 on Unit 1, a concern existed as to whether or not the appropriate surveillance requirements had been met for various divider barrier personnel access doors (EIIS/NH-DR) and equipment hatches (EIIS/NH-BHD). While following up on the concern a question arose relative to previous surveillance compliance on May 2, 1994 when the unit had undergone a similar mode change. A condition report was written to investigate and follow up on the question and provide proper close out documentation. The May 24, 1994 concern was resolved through a review of work packages and performance of a surveillance on two personnel access doors.

During the investigation of the condition report the incorrect event date was reviewed. The May 24, 1994 mode change was reviewed instead of the May 2, 1994 mode change. The condition report was closed based on the performance of the required surveillance being performed prior to the May 24, 1994 mode change. On July 8, 1994, during a review of the condition report package it was determined that the incorrect date had been investigated and that the condition report would need to be reopened. The condition report was reopened on July 12, 1994. A second condition report was written to document the error that occurred during the initial investigation.

Evaluation of the May 2, 1994 event concluded that two personnel access doors had not been surveilled, as no means existed to demonstrate the surveillance requirements had been met, and that this condition was reportable as a condition prohibited by plant's technical specifications (TS). A due date of August 11, 1994 was set for the licensee event report (LER) based on the condition report reopening date of July 12, 1994.

Plant TS 3.6.5.5, Divider Barrier Personnel Access Doors and Equipment Hatches, Surveillance Requirement 4.6.5.5.2a requires that the personnel access doors and equipment hatches between the containment's upper and lower compartments shall be determined operable by visually inspecting the seals and sealing surfaces of these penetrations and verifying no detrimental misalignments, cracks or defects in the sealing surfaces, or apparent deterioration of the seal material prior to final closure of the penetration each time it has been opened. As a result of not providing adequate administrative controls to ensure and document compliance with TS 4.6.5.5.2a it could not be determined if the surveillance had or had not been met for two personnel access doors. Both personnel access doors are 24" diameter manways which provide access between upper and lower containment volumes. Due to the inability to demonstrate compliance with the surveillance and knowledge that the doors were accessible and used during the Unit 1 outage it was concluded that the surveillance requirement had been missed.

Cause of Event

Failure to establish adequate administrative controls to ensure conduct and documentation of compliance with TS 4.6.5.5.2a.

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

Analysis of Event

This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as operation prohibited by the plant's TS. Plant TS 3.6.5.5, Divider Barrier Personnel Access Doors and Equipment Hatches, Surveillance Requirement 4.6.5.5.2a requires that the personnel access doors and equipment hatches between the containment's upper and lower compartments shall be determined operable by visually inspecting the seals and sealing surfaces of these penetrations and verifying no detrimental misalignments, cracks or defects in the sealing surfaces, or apparent deterioration of the seal material prior to final closure of the penetration each time it has been opened. As a result of not providing adequate administrative controls to ensure and document compliance with TS 4.6.5.5.2a it could not be determined if the surveillance had or had not been met for two personnel access doors. Due to the inability to demonstrate compliance with the surveillance and the knowledge that the subject doors were accessible and used during the Unit 1 outage it was concluded that the surveillance requirement had been missed.

This missed surveillance did not result in a risk to the public health and safety based on the following. Typically surveillances demonstrate equipment operability verse inoperability, as was the case for the subject personnel access doors. The surveillance conducted prior to the May 24, 1994 mode change demonstrated that the doors were closed and the seals were operable. The requirements for the divider barrier personnel access doors and equipment hatches being closed and operable ensure that a minimum bypass steam flow will occur from the lower to the upper containment compartments during a Loss of Coolant Accident. An engineering evaluation of the sealing arrangement concluded that with proper closure of the personnel access doors even without any seal present the allowable bypass flow area would have remained below the minimum bypass flow area assumed in the update final safety analysis report (UFSAR).

Corrective Action

The two suspect personnel access doors were inspected prior to mode ascension on May 24, 1994 and found to be operable. Administrative controls will be enhanced to ensure compliance and documentation of the subject surveillance requirement. These controls are scheduled to be in place prior to September 6, 1994.

Failed Component(s)

None

Previous Similar Events

50-315/89-009
50-315/89-010
50-315/89-014
50-315/91-001