

PRIORITY 1
(ACCELERATED RIDS PROCESSING)
REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9408170039 DOC. DATE: 94/08/05 NOTARIZED: NO DOCKET #
FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M. 05000315
AUTH. NAME AUTHOR AFFILIATION
BAKER, K.R. 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 94-009-00: on 940712, discovered required continuous fire watch post not established due to inadequate administrative controls. Continuous fire post established & change made to work control process. W/940805 ltr.

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

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD3-1 PD	1 1	HICKMAN, J	1 1
INTERNAL:	AEOD/DSP/TPAB	1 1	AEOD/ROAB/DSP	2 2
	NRR/DE/EELB	1 1	NRR/DE/EMEB	1 1
	NRR/DORS/OEAB	1 1	NRR/DRCH/HHFB	1 1
	NRR/DRCH/HICB	1 1	NRR/DRCH/HOLB	1 1
	NRR/DRSS/PRPB	2 2	NRR/DSSA/SPLB	1 1
	NRR/DSSA/SRXB	1 1	NRR/PMAS/IRCB-E	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
	NRC PDR	1 1	NSIC MURPHY, G.A	1 1
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Indiana Michigan
Power Company
Cook Nuclear Plant
One Cook Place
Bridgman, MI 49106
616 465 5901



August 5, 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:

94-009-00

Sincerely,

A handwritten signature in dark ink, appearing to read 'A. A. Blind', written over the printed name.

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
J. B. Hickman - NRC
J. R. Padgett
G. Charnoff, Esq.
D. Hahn
INPO
S. J. Brewer

IF22
11

9408170039 940805
PDR ADOCK 05000315
S PDR

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 500 HRS. FORWARD
COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION
AND RECORDS MANAGEMENT BRANCH, RM8B 774, 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 1

DOCKET NUMBER (2)

05000315

PAGE (3)

1 OF 4

TITLE (4)

Required Continuous Fire Watch Post Not Established 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	
07	12	94	94	009	00	08	05	94	FACILITY NAME	DOCKET NUMBER	
										05000	
									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)		100%			20.405(a)(1)(i)			50.36(c)(1)			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 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

K. R. Baker - Operations 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 NPDOS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS

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)

On July 12, 1994 at 0000 hours, with Unit 1 in Mode 1 at 100% power, the Unit 1 Turbine Building Fire Protection header between 1-FP-183 and 1-FP-196 was found to have been isolated.

Two clearances supporting maintenance evolutions for fire protection header system component repairs were placed into effect concurrently without appropriate compensatory actions being initiated. Fire Zone #105, the Contractor Access Control area which gives access to the Auxiliary Building, is required to be under a continuous fire watch patrol when the fire suppression system for this area is inoperable. Contrary to Technical Specification 3.7.9.2.b, a continuous fire watch patrol was not established.

When discovered, a continuous fire watch post was established in accordance with Technical Specifications, and remained in effect until the clearances had been lifted and the system restored.

This event was determined not to have safety significance and did not represent a hazard to the safety and health of the public.

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.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)										
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER											
D. C. Cook Nuclear Plant - Unit 1	0 5 0 0 0 3 1 5	9	4	-	0	0	9	-	0	0	0	2	OF	0	4

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

Conditions Prior to Occurrence:

Unit 1 in Mode 1 (Power Operation) at 100 percent Rated Thermal Power.

Description of Event:

On July 12, 1994 at 0000 hours, the Unit 1 Turbine Building Fire Protection header was found to have been isolated between valves 1-FP-183 and 1-FP-196. This portion of the fire header was isolated when two clearances supporting maintenance evolutions for system component repairs were placed into effect concurrently. These tagouts were accomplished without appropriate compensatory fire watch actions being established.

Valve 1-FP-196 was closed on Clearance #1941396 to facilitate work on the Victaulic coupling of valve 1-FP-251. Valve 1-FP-183 was closed under Clearance #1941153 with the intention of isolating the portion of the fire protection header between 1-FP-183 and 1-FP-175 to perform repairs on various fire protection components.

The evolution which closed 1-FP-196 had been planned and executed without interface with the Integrated Scheduling Department due to the malfunction of the Victaulic coupling of valve 1-FP-251. This malfunction occurred as the system was being pressurized upon release of a clearance. The clearance for 1-FP-196 was already in place when Clearance #1941153 closed 1-FP-183, and isolated the header.

The closure of these valves left Fire Zone #105 in the Contractor Access Control (CAC) area unprotected by a sprinkler system, which resulted in the requirement that a continuous fire watch be established in the area. This requirement was not recognized as it was not realized that the header between the FP-183 and FP-196 valves had been isolated. The only fire watch in the area was the half hour patrol for door 1-DR-AUX517. This door provides access to the 612 foot elevation of the Auxiliary Building from the CAC area. The failure to establish a continuous fire watch in Fire Zone #105 is contrary to Technical Specification 3.7.9.2b.

Cause of Event:

A clearly defined work control process was not in place to ensure Fire Protection components being used as clearance boundaries were tracked as out of service by the Fire Protection Group.

The Fire Protection Group had proposed boundaries to support the maintenance activities, but was not made aware that the boundaries chosen for the clearance package were different from those proposed. During the clearance package assembly process, appropriate feedback was not given to the Fire Protection Group to update them on current system status.

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-5301), 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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D. C. Cook Nuclear Plant - Unit 1	0 5 0 0 0 3 1 5	9	4	0	0	9	0	0	0	3	OF	0	4

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

Analysis of Event:

This event is being reported per 10CFR50.73(a)(2)(i)(B), as operation prohibited by plant Technical Specifications. Technical Specification 3.7.9.2b requires that with one or more of the sprinkler systems inoperable, within 1 hour:

- 1) verify that at least one of the detection systems, where provided for the affected area, is OPERABLE and establish an hourly fire watch patrol, or
- 2) establish a continuous fire watch patrol.

The CAC area is protected by a wet pipe sprinkler system and has no fire detection. There is no equipment located in this area, as it is now used mostly for storage, and has a low fire rating consisting mainly of Class A combustibles materials with a fire duration of approximately 30 minutes.

The CAC area abuts the Main Steam Line area, Fire Zone #33A. The two fire zones are separated on the main floor of the CAC by a wall constructed of metal studs and double layers of sheet rock. This wall was originally designed to be a one and a half hour rated fire barrier, however, credit was not taken for the wall. The second floor of the CAC is separated from the Main Steam Line area by sheet rock and the metal outer wall of the Main Steam Line area.

The Main Steam Line area has a low fire loading consisting of Class A materials in the form of ordinary combustibles and cable insulation in cable trays with a fire duration of approximately 15 minutes. The two doors separating the two fire zones are one and a half hour rated fire doors. The Main Steam Line area is protected by a fire detection system consisting of ionization and infra-red fire detectors.

Due to the low combustible loading in the CAC, any fire that may start can be expected to be small and slow in developing. With the half hour fire watch tour on door 1-DR-AUX517 it is expected that any fire would be detected before out of control. This door provides access to the 612 foot elevation airlock of the Auxiliary Building, and is checked by the fire watch patrol by entry via the CAC area.

In the event of a fire on the main floor of the CAC it is expected that heat and smoke would rise through the open stairway to the second level of the CAC before they would challenge the wall separating the two fire zones. If a fire did breach the wall separating the zones, the fire would be detected by the ionization and infra-red systems in Fire Zone #33A. An alarm would be transmitted to the Control Room allowing the plant fire brigade to respond and extinguish the fire.

Based on the low fire loading in the CAC area, the barrier between the two fire zones, and the half hour fire watch tour transversing the area, it has been determined that this event was not significant. This event did not create a safety concern, nor did it create a hazard to the health and safety of the general public.

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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D. C. Cook Nuclear Plant - Unit 1	0 5 0 0 0 3 1 5	9	4	-	0	0	9	-	0	0	0	4	OF	0	4

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

Corrective Actions:

When discovered, a continuous fire watch post was established in accordance with Technical Specifications, and remained in effect until the clearances had been lifted and the system restored.

The following changes have been made to improve the work control process:

The PMSO.122 forms (Voluntary Removal From Service of Technical Specification Required Equipment, Vital Secondary Equipment and Fire Protection Equipment) are now being sent out to the Centralized Clearance Group (CCG) two weeks in advance. This allows the CCG adequate preparation time to develop Clearances in support of proposed maintenance activities.

Operations personnel will notify the Fire Protection Group prior to hanging clearances. Operations personnel will then work with the Fire Protection personnel to mark up component flow diagrams in accordance with the established clearance boundaries.

Operations personnel will contact the Fire Protection Group after clearance restoration, to aid the Fire Protection personnel in accurately tracking Fire Protection equipment status.

The Nuclear Plant Maintenance System (NPM) is being used by the Fire Protection Group to verify component status prior to developing clearance request forms.

Failed Component Identification:

None

Previous Similar Events:

050-0315/91-001