

# PRIORITY 1

(ACCELERATED RIDS PROCESSING)

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9510170247 DOC. DATE: 95/10/10 NOTARIZED: NO DOCKET #  
FACIL: 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316  
AUTH. NAME AUTHOR AFFILIATION  
NICHOLS, W. 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 95-009-00: on 940402 conditions occurred outside design basis due to personnel error in aligning ESF fans for surveillance testing. Restarted filter exhaust train.  
W/951010 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4  
TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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EXTERNAL:	L ST LOBBY WARD	1 1	LITCO BRYCE, J H	2 2
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616 465 5901



October 10, 1995

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:

94-009-00

Sincerely,

A. A. Blind  
Plant Manager

/clc

Attachment

c: H. J. Miller, Region III  
E. E. Fitzpatrick  
P. A. Barrett  
R. F. Kroeger  
M. A. Bailey - Ft. Wayne  
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M. R. Padgett  
G. Charnoff, Esq.  
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NRC Resident Inspector

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<b>NRC FORM 366</b> (5-92)				<b>U.S. NUCLEAR REGULATORY COMMISSION</b>				<b>APPROVED BY OMB NO. 3150-0104</b> <b>EXPIRES 5/31/95</b>															
<h2 style="margin: 0;">LICENSEE EVENT REPORT (LER)</h2> <p style="margin: 5px 0;">(See reverse for required number of digits/characters for each block)</p>												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.											
<b>FACILITY NAME (1)</b> Donald C. Cook Nuclear Plant - Unit 2								<b>DOCKET NUMBER (2)</b> 05000 316				<b>PAGE (3)</b> 1 OF 3											
<b>TITLE (4)</b> Plant Conditions Outside the Design Basis Due to Personnel Error In Aligning Engineered Safety Feature Fans for Surveillance Testing																							
<b>EVENT DATE (5)</b>			<b>LER NUMBER (6)</b>			<b>REPORT NUMBER (7)</b>			<b>OTHER FACILITIES INVOLVED (8)</b>														
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME		DOCKET NUMBER												
04	2	94	94	009	00	10	10	95			05000												
										FACILITY NAME		DOCKET NUMBER											
												05000											
<b>OPERATING MODE (9)</b>		4		<b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)</b>																			
<b>POWER LEVEL (10)</b>		--		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)		X 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)																			
<b>LICENSEE CONTACT FOR THIS LER (12)</b>																							
<b>NAME</b> W. Nichols, Operation Superintendent								<b>TELEPHONE NUMBER (include Area Code)</b> 616-465-5901 x2536															
<b>COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)</b>																							
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE		SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS													
<b>SUPPLEMENTAL REPORT EXPECTED (14)</b>										<b>EXPECTED SUBMISSION DATE (15)</b>		MONTH	DAY	YEAR									
YES (if yes, complete EXPECTED SUBMISSION DATE)				X NO																			
<b>ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)</b> <p>On April 2, 1994, while performing a post high efficiency particulate air (HEPA) filter replacement surveillance test on one of the Unit 2 Engineered Safety Feature Exhaust Filter Train the redundant Unit 2 Exhaust Filter Train Unit was taken to off resulting in entry into Technical Specification (TS) 3.0.3. The plant's TSs provide action for a single inoperable Exhaust Filter Train; however, upon inoperability of both trains, TS 3.0.3 is entered. This alignment existed for six minutes prior to being recognized. Once recognized the Exhaust Filter Train which had been taken to off was immediately restarted.</p> <p>Based on the available information, this event was originally determined to not be reportable under 10CFR50.72 or 10CFR50.73. However, the event was later reevaluated and determined to be reportable under 10CFR50.73(a)(2)(i)(B), as a condition prohibited by the plant's Technical Specifications and 10CFR50.73(a)(2)(ii), as a condition that was outside the design basis of the plant. The original reportability review had assumed credit for the exhaust filter train under test, which was subsequently confirmed operable through surveillance testing; therefore, during the six minutes of misalignment only one Exhaust Filter Train was considered inoperable and TS 3.0.3 need not have been entered. The design basis criteria was not considered applicable as the event response was being directed by the technical specifications.</p> <p>This event has minimal safety significance as the Exhaust Filter Train under test was capable of performing it's intended safety function, the misalignment was of short duration and proper operation of the system is confirmed as part of the emergency operating procedures when the system is required. At no time was the health or safety of the public in jeopardy.</p>																							

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 600 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 (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Donald C. Cook Nuclear Plant - Unit 2	0 5 0 0 0 3 1 6	9 4	— 0 0 9	— 0 0	0 2	OF	0 3

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

**CONDITIONS PRIOR TO OCCURRENCE**

Unit 2 in Mode 4, Hot Shutdown, at 341 degrees F

**DESCRIPTION OF EVENT**

On April 2, 1994, while performing a post high efficiency particulate air (HEPA) filter replacement surveillance test on one of the Unit 2 Engineered Safety Feature Exhaust Filter Train the redundant Unit 2 Exhaust Filter Train Unit was taken to off resulting in entry into Technical Specification (TS) 3.0.3. The plant's TSs provide action for a single inoperable Exhaust Filter Train; however, upon inoperability of both trains, TS 3.0.3 is entered. TS 3.0.3 was entered as the Exhaust Filter Train under test had not yet been demonstrated operable and it's redundant Exhaust Filter Train was inoperable as it would not have automatically started as required from the off position. This alignment existed for six minutes prior to being recognized. Once recognized the Exhaust Filter Train which had been taken to off was immediately restarted.

**CAUSE OF EVENT**

The cause of this event was personnel error. The individual performing the AES system alignment is a licensed reactor operator and is responsible to understand and maintain system operability during surveillance testing.

**ANALYSIS**

Based on the available information, this event was originally determined to not be reportable under 10CFR50.72 or 10CFR50.73. However, the event was later reevaluated and determined to be reportable under 10CFR50.73(a)(2)(i)(B), as a condition prohibited by the plant's Technical Specifications and 10CFR50.73(a)(2)(ii), as a condition that was outside the design basis of the plant. The original reportability review had assumed credit for the exhaust filter train under test, which was subsequently confirmed operable through surveillance testing; therefore, during the six minutes of misalignment only one Exhaust Filter Train was considered inoperable and TS 3.0.3 need not have been entered. The design basis criteria was not originally considered applicable as the event response was being directed by the technical specifications.

This event has minimal safety significance as the Exhaust Filter Train under test was capable of performing it's intended safety function, the misalignment was of short duration and proper operation of the system is confirmed as part of the emergency operating procedures when the system is required. At no time was the health or safety of the public in jeopardy.

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-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			
Donald C. Cook Nuclear Plant - Unit 2	0 5 0 0 0 3 1 6	9 4	0 0 9	0 0	0 3	OF	0 3

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

**CORRECTIVE ACTION**

The Filter Exhaust Train that had been taken to off was immediately restarted once the inappropriate alignment was recognized.

The licensed operator involved was counselled on the expectations of the Operations Department personnel during surveillance testing and on the requirements of technical specification 3.7.6.1, Engineered Safety Features Ventilation System.

**FAILED COMPONENT IDENTIFICATION**

None

**PREVIOUS SIMILAR EVENTS**

None