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SUBJECT: Special rept:on 960814,determined radiation monitor inoperable since isolation of 1-MRV-213 on 960802.1-MRV-213 leakby problem will be corrected,when parts become available,tentatively scheduled for Oct.

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Donald C. Cook Nuclear Plant Unit 1
Docket No. 50-315
License No. DPR-58
Special Report, Technical Specification 3.3.3.1

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

August 16, 1996

Gentlemen:

This Special Report is being submitted in accordance with Technical Specification (TS) 3.3.3.1, Action Statement 22B, to inform the NRC that the Steam Generator (SG) Power Operated Relief Valve (PORV) Radiation Monitor for Loop 1, 1-MRA-1601, was inoperable longer than allowed by the Action Statement.

On August 2, 1996, at 1700 hours, the PORV for Steam Generator #1, 1-MRV-213, was isolated. The valve had been observed to be leaking by as evidenced by wisps of steam exhausting to atmosphere. The manual isolation valve upstream of 1-MRV-213 was closed, effectively isolating the leakage.

During preparation of the draft Safety Evaluation for extended operation of the unit with this valve configuration, it was determined that operation with 1-MRV-213 isolated affected operability of the downstream radiation monitor. 1-MRA-1601 monitors the gaseous effluent flow from a location on the SG #1 PORV discharge vent to atmosphere. The physical location of the monitor required an exemption from the requirements of NUREG-0737, Item II.F.1, due to the possibility of steam flow bypassing the monitor should the safety valve(s) lift during a Steam Generator Tube Rupture (SGTR). An exemption was granted by the NRC on April 6, 1990, after a review of the plant configuration and the alternate monitoring methods in place.

On August 14, 1996, it was determined that the radiation monitor had been inoperable since the isolation of 1-MRV-213 on August 2, 1996, and that the 7 day Action Statement for return to operability had not been met. Because the monitor was not returned to service prior to August 9, 1996, a Special Report must be submitted within 14 days of the event, in accordance with Action Statement 22B of TS 3.3.3.1. This letter shall serve to fulfill the requirements of the Special Report.

While 1-MRA-1601 was inoperable, permanent procedures were in place that served as compensatory actions. These procedures, which were reviewed and approved by the NRC prior to the granting of the exemption issued for the physical location of 1-MRA-1601, consist of an Emergency Plan procedure that contains diverse methods for determining release levels from the Main Steam System in the event that the PORV vent path is unavailable. The procedure, PMP 2081.EPP.107 "Alternate Release Level Determinations", would be used if the radiation data display system is inoperable or if a radiation monitor is off scale or bypassed. Four major effluent paths are considered in the procedure: the gland seal leak off, the SJAE exhaust, the unit vent, and Main Steam (SG safeties/PORV). The method of estimating a release rate involves sending out radiation monitoring teams to predesignated locations to obtain dose rate measurements or grab samples. Release rate is then determined by multiplying the dose rate or grab sample results by the appropriate correct factors.

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PMP 2081.EPP.107 also includes a method to estimate release rate if sampling and monitoring data is unavailable or cannot be obtained in time to support a dose assessment. This method involved the use of a logic diagram that utilizes information on plant conditions, when it is available, and utilizes conservative default values when information on plant conditions is unavailable.

The block valve upstream of 1-MRV-213 was reopened on August 14, 1996 at 1605 hours, and 1-MRA-1601 returned to service and declared operable. The 1-MRV-213 leakby problem will be corrected when parts become available, tentatively scheduled for October.

Sincerely,

A. A. Blind
Site Vice President

c: A. B. Beach, Region III
E. E. Fitzpatrick
NRC Resident Inspector
NFEM Section Chief, State of Michigan