

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9806170082 DOC. DATE: 98/06/12 NOTARIZED: NO DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
 AUTH. NAME AUTHOR AFFILIATION
 VERTERAMO, A. American Electric Power Co., Inc.
 SAMPSON, J. R. American Electric Power Co., Inc.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-028-00: on 980513, determined that TS surveillance requirements not met due to lack of understanding of "staggered test basis". Caused by lack of specific training. Periodic change of Nuclear Plant Maint Sys. W/980612 ltr.

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

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



June 12, 1998

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

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:

98-028-00

Sincerely,

A handwritten signature in cursive script, appearing to read "J. R. Sampson".

J. R. Sampson
Site Vice President

/mbd

Attachment

c: C. J. Paperiello (Acting), Region III
J. R. Sampson
P. A. Barrett
S. J. Brewer
R. Whale
D. Hahn
Records Center, INPO
NRC Resident Inspector

9806170082 980612
PDR ADDCK 05000315
S PDR

LICENSEE EVENT REPORT (LER)

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 - Unit 1

DOCKET NUMBER (2)
50-315

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TITLE (4)

Technical Specification Surveillance Requirement Not Met Due to Lack of Understanding of "Staggered Test Basis"

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
05	13	98	98	-- 028 --	00	06	12	98	Cook Unit 2	
OPERATING MODE (9)		5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		0	20.2201(b)			20.2203(a)(3)(i)			50.73(a)(2)(iii)	73.71(b)
			20.2203(a)(1)			20.2203(a)(3)(ii)			50.73(a)(2)(iv)	73.71c
			20.2203(a)(2)(i)			20.2203(a)(4)			50.73(a)(2)(v)	OTHER
			20.2203(a)(2)(ii)			50.36(c)(1)			50.73(a)(2)(vii)	(Specify in Abstract below and in Text, NRC Form 366A)
			20.2203(a)(2)(iii)			50.36(c)(2)			50.73(a)(2)(viii)(A)	
			20.2203(a)(2)(iv)		X	50.73(a)(2)(i)			50.73(a)(2)(viii)(B)	
			20.2203(a)(2)(v)			50.73(a)(2)(ii)			50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME: Mr. Alberto Verteramo, Performance Testing Manager
TELEPHONE NUMBER (Include Area Code): 616/465-5901, x1537

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)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On May 13, 1998, with both Unit 1 and Unit 2 in Mode 5, plant personnel determined that testing of the Unit 1 and Unit 2 Containment Recirculation system fans (CEQ fans) had not been performed on a "staggered test basis", as required by Technical Specification 4.6.5.6. The T/S requires that each of the 2 trains of CEQ fans be tested at least once per 3 months for Unit 1 and once per 92 days for Unit 2 on a staggered test basis. In accordance with the staggered test basis requirements, the surveillances must be performed at equal intervals, alternating between the 2 trains. As these surveillance requirements were not met, this event is reportable under 10CFR50.73(a)(2)(i)(B), as operation prohibited by Technical Specifications.

The cause of this event was determined to be lack of specific training on the use and application of the Technical Specifications. A familiarization session was held for the Performance Test engineers to ensure that they understand the T/S requirements as they relate to the systems being tested. Formal training on T/S will also be held for all personnel in the Performance Test section on the structure, contents and requirements of T/S. Plant scheduling department was directed to revise the test period between trains in both units to bring the test schedule in compliance with the staggered test basis requirement.

A review of CEQ fan testing results for the past 3 years was conducted. The review indicated that out of the 56 tests performed, only 2 failures occurred, with only 1 of those failures occurring outside the required test interval. Therefore, given the high reliability of the CEQ fans coupled with a low failure rate, the failure to comply with the staggered test basis requirement had no impact on the safe operation of either unit.

LICENSEE EVENT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
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TEXT (if more space is required, use additional NRC Form 366A's) (17)

Conditions Prior to Event

Unit 1 was in Mode 5, Cold Shutdown
Unit 2 was in Mode 5, Cold Shutdown

Description of Event

Technical Specification (T/S) 4.6.5.6 for both Units 1 and 2 requires that each containment recirculation system (CEQ) shall be demonstrated operable at least once per 3 months for Unit 1 and once per 92 days for Unit 2, on a staggered test basis. "Staggered test basis" is defined as: a) A test scheduled for "n" systems, subsystems, trains or other designated components obtained by dividing the specified test interval into "n" equal subintervals, b) The testing of one system, subsystem, train or other designated component at the beginning of each subinterval.

While revising the containment hydrogen skimmer ventilation test procedure, plant personnel questioned whether or not the surveillance was performed on a staggered test basis. The fans are tested on a staggered basis is to prevent an inoperable CEQ train from going undetected throughout the surveillance interval. After reviewing the definition for staggered test basis, past test data was reviewed for the period of January 1995 to the present for both units to determine if the surveillances had been performed in accordance with the requirements. Review of the test data, confirmed that, although the surveillances had been performed within the overall time intervals stipulated, the staggered test basis requirement was not met on several occasions.

Cause of the Event

The root cause was determined to be lack of training on the use and structure of T/S for the test Engineers, which resulted in the misapplication of the T/S requirements. Being unfamiliar with T/S, the personnel involved did not realize that a definition was provided for staggered test basis in Section 1.

Lack of understanding of the definition of staggered test basis resulted in improper scheduling sequences. As the personnel involved interpreted the requirements to simply mean that the CEQ trains had to be tested in an alternating manner, incorrect inputs were provided to the Nuclear Test Scheduler (NTS) system and the Nuclear Plant Maintenance (NPM) system. As a result, NTS was not set up to monitor staggered test frequencies, and NPM was not set up with the correct interval between tests of the respective trains.

Analysis of Event

This condition was determined to represent an operation not meeting the requirements of Technical Specification 4.6.5.6, which requires each containment air recirculation system to be demonstrated operable at least once per 3 months on a staggered test basis. This LER is therefore submitted in accordance with 10CFR50.73(a)(2)(i)(B) for any operation or condition prohibited by Technical Specifications.

A total of 56 surveillance tests were performed on the CEQ fans in both units from January 1995 to the present. Of the 56 tests performed, 21 did not meet the staggered test basis requirement. During this same period, only 2 tests failed to meet the surveillance acceptance criteria. In both instances, the CEQ fans were already inoperable due to previous maintenance activities, or due to an unrelated surveillance that made the CEQ fans inoperable. Of the two failed tests, only one occurred beyond the staggered test basis frequency.

The safety significance of the condition was assessed. Based on the high reliability of the CEQ fans, and the low failure rate, it was determined that the failure to comply with the staggered test basis requirement has no impact on safety for either unit. -

LICENSEE EVENT CONTINUATION

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

Corrective Actions

The Scheduling department was directed to change the NPM periodicity between trains in both units. The Job Orders associated with the surveillance procedure have been reset such that the next required date is consistent with a staggered test basis as defined in Section 1 of the T/S.

The NTS records associated with the surveillance procedure will be reset with the completion of the surveillance procedure on each CEQ train such that the next required date is consistent with a staggered test basis as defined in Section 1 of the T/S. This will synchronize the NTS and respective Job Orders dates.

The personnel in the Engineering Test section (ENPT) will review the T/S surveillances for which they are responsible to ensure that the surveillances are being performed in accordance with all T/S requirements and definitions.

A familiarization session was held for ENPT personnel on the use of T/S and definitions. All ENPT personnel will also attend formal training, both initial and continuing, on T/S to ensure that they are conversant with the structure, content and requirements of the T/S.

Information on this failure to correctly perform a T/S surveillance will be provided to the personnel responsible for the overall surveillance program review. This will ensure that surveillances performed by other sections and departments will be reviewed for similar noncompliances.

Failed Equipment Identification

Not Applicable

Previous Similar Events

None