

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9804280276 DOC. DATE: 98/04/20 NOTARIZED: NO DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
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 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-009-01: on 980217, HR SR not being met resulted in
 condition prohibited by TS. Caused by inadequate procedures.
 TS change has been submitted to revise surveillance
 procedure. W/980420 ltr.

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

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Indiana Michigan
Power Company
Cock Nuclear Plant
Cock Place
Bridgman, MI 49106



April 20, 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:

98-009-01

Sincerely,

A handwritten signature in cursive script, reading 'J. R. Sampson', is written over the typed name.

J. R. Sampson
Site Vice President

/mbd

Attachment

c: A. B. Beach, Region III
E. E. Fitzpatrick
P. A. Barrett
S. J. Brewer
R. Whale
D. Hahn
Records Center, INPO
NRC Resident Inspector

9804280276 980420
PDR ADOCK 05000315
S PDR

JE 22

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 (MNB 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 1DOCKET NUMBER (2)
50-315

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TITLE (4)

Hydrogen Recombiner Surveillance Requirement Not Being Met Results in A Condition Prohibited by Technical Specifications

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
02	17	98	98	-- 009 --	01	04	20	98	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10)	00	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)	73.71(c)
		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. Mike Finissi, System Engineering - Electrical Supervisor

TELEPHONE NUMBER (Include Area Code)

616/465-5901, x2830

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	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
(If yes, complete EXPECTED SUBMISSION DATE).	X				

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

On February 17, 1998, it was determined that the Unit 1 hydrogen recombinder surveillance requirement (SR) 4.6.4.2.b4 was not met on June 17, 1997. SR 4.6.4.2.b4 requires verification of the integrity of all heater electrical circuits associated with the electric hydrogen recombiners by performing a continuity and resistance to ground test immediately following a system functional test and achieving a minimum resistance of 10,000 ohms. On June 17, 1997, the timing of the resistance measurement was not in accordance with the T/S requirement to immediately perform the resistance to ground test. This event is being reported under 10CFR50.73(a)(2)(i)(B) as an operation or condition prohibited by the plant Technical Specifications (T/Ss).

The cause of this event was determined to be an inadequate surveillance procedure. Additionally, Westinghouse verified that the acceptance criteria is based on the resistance test being performed at ambient temperatures. Therefore, a T/S change has been submitted. Upon approval of the T/S, the surveillance procedure will be revised to reflect the new T/S, and the unit 1 hydrogen recombiners will be retested in accordance with the new procedure. The test will be completed prior to the unit achieving mode 2.

Based on a review of past surveillance data, no instances were found where the unit 1 recombiners were returned to service with resistance values less than the required T/S minimum. Based on this information, there is reasonable assurance that the recombiners would have performed their intended design function. Therefore, this event had no significant safety consequences for the plant or the health and safety of the public.

LICENSEE EVENT CONTINUATION

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 (MNB87714), 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.

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Cook Nuclear Plant - Unit 1	50-315	98	-- 009 --	01	2 OF 3

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

Conditions Prior to Event

Mode 5

Power level 0

Description of Event

On February 17, 1998, it was determined that the Unit 1 T/S requirement to measure the hydrogen recombiner heater element resistance to ground immediately after performing the functional test was not met on June 17, 1997. The acceptance criteria for this surveillance is that the resistance to ground must be at least 10,000 ohms. The resistance to ground for the Unit 1 recombiner was measured 30 minutes after completion of the functional test and was found to be 6,000 ohms, 4000 ohms less than the T/S minimum. A second set of readings was taken approximately ½ hour after the initial readings and were acceptable. The timing of the measurements was not in accordance with the T/S requirement to immediately perform the resistance to ground test.

Cause of the Event

The cause of this event was determined to be an inadequate surveillance procedure. Unit 1 T/S surveillance 4.6.4.2.b.4 requires that continuity and resistance to ground testing be performed immediately following the functional test (T/S surveillance 4.6.4.2.b.3) to verify the integrity of the heater electrical circuits. Procedure 12EHP 4030.STP.206 has a note that says the resistance test must be performed immediately after the functional test, however, no directions are given as to how the immediately criteria is to be met. The procedure does not require that the start and stop times between tests be recorded and no definition of "immediately" is provided.

Analysis of the Event

This event was reported on February 17, 1998 via ENS at 1602 hours EST under 10CFR 50.72(a)(2)(i) as a condition found while shutdown that had it been found while the reactor was operating would have resulted in the nuclear power plant being in an unanalyzed condition. An interim LER was submitted on March 19, 1998. This LER is submitted in accordance with 10CFR 50.73(a)(2)(i)(B) as an operation or condition prohibited by the plants T/Ss.

The Unit 2 T/Ss, which were based on the Standard Westinghouse T/Ss in use at the time, do not have the requirement to perform the resistance test immediately following the functional test. No basis for performing the surveillance immediately following the functional test could be found.

Westinghouse has identified that the resistance increases as the equipment temperature decreases. Additionally, Westinghouse determined that the T/S acceptance criteria is based on the resistance test being performed with the heater elements at ambient temperature. Therefore, it was determined that the T/S requirement to immediately perform the resistance test was an error.

Based on a review of past surveillance data taken between 1989 and present, no instances were found where the Unit 1 recombiners were returned to service with resistance values less than the required T/S minimum. In addition, the data review did not indicate any other occasion where it was necessary to take a second set of readings. Therefore, although the T/S requirement was not complied with literally, there is reasonable assurance that the recombiners would have performed their intended design function.

LICENSEE EVENT CONTINUATION

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

Corrective Action

Unit 1 hydrogen recombiners were declared inoperable.

A T/S change has been submitted to remove the word "immediately" from the surveillance requirement.

The recombiner surveillance procedures will be revised to include a specific recombiner temperature prior to performing the resistance checks. The procedures will be revised after the T/S change has been received and prior to mode 2.

Both Unit 1 hydrogen recombiners will be tested in accordance with the revised surveillance procedures prior to mode 2.

Failed Component Identification

None.

Previous Similar Events

None

