

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9808310015 DOC. DATE: 98/08/24 NOTARIZED: NO DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
 AUTH. NAME AUTHOR AFFILIATION
 BOESCH, J. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 SAMPSON, J.R. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-036-00: on 980723, discovered that flow indicator had
 not been calibr at TS required frequency. Caused by
 inadequate work practices. Action request has been written to
 calibr component on refueling outage basis. W/980824 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
Cook Nuclear Plant
One Cook Plant
Bridgman, MI 49106
616 465 5901



August 24, 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:

98-036-00

Sincerely,

A handwritten signature in cursive script that reads "John R. Sampson".

J. R. Sampson
Site Vice President

/mbd

Attachment

c: J. L. Caldwell, NRC
J. R. Sampson
P. A. Barrett
J. B. Kingseed
R. Whale
D. Hahn
Records Center, INPO
NRC Resident Inspector

LE2211

9808310015 980824
PDR ADOCK 05000315
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LICENSEE EVENT REPORT (LER)

(See reverse for required number of
digits/characters for each block)ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY
INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED
ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO
INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE
INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), 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) Cook Nuclear Plant Unit 1										DOCKET NUMBER (2) 50-315		PAGE (3) 1 of 3		
TITLE (4) Flow Indicator Not Calibrated at Technical Specification Required Frequency														
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 Cook		DOCKET NUMBER 50-316			
07	23	98	98	- 036	- 00	08	24	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)		0	20.2201 (b)				20.2203(a)(2)(v)			<input checked="" type="checkbox"/> 50.73(a)(2)(i)		50.73(a)(2)(viii)		
			20.2203(a)(1)				20.2203(a)(3)(i)			50.73(a)(2)(ii)		50.73(a)(2)(x)		
			20.2203(a)(2)(i)				20.2203(a)(3)(ii)			50.73(a)(2)(iii)		73.71		
			20.2203(a)(2)(ii)				20.2203(a)(4)			50.73(a)(2)(iv)		OTHER		
			20.2203(a)(2)(iii)				50.36(c)(1)			50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A		
			20.2203(a)(2)(iv)				50.36(c)(2)			50.73(a)(2)(vii)				
LICENSEE CONTACT FOR THIS LER (12)														
NAME Mr. John Boesch, Maintenance Superintendent										TELEPHONE NUMBER (Include Area Code) 616 / 465-5901 x2634				
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)										EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input checked="" type="checkbox"/> YES (If Yes, complete EXPECTED SUBMISSION DATE).					<input checked="" type="checkbox"/> NO									
Abstract (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16) On July 23, 1998, during a verification of Technical Specification (TS) surveillance requirements, it was discovered that the "Unit 1 To And From Unit 2 Chemical Volume Control System Charging Pump Discharge Cross-tie Flow Indicator," 12-QFI-201, had not been surveillance tested since August 12, 1992. TS 4.3.3.5.1, Table 4.3-6a, Item 11 requires calibration of this charging cross-flow indicator at least once every 549 days. This LER is submitted in accordance with 10CFR50.73(a)(2)(i)(B), for a condition prohibited by the plant's Technical Specifications. The root cause was work practices, with a contributing cause of lack of effective communications. To correct this condition, 12-QFI-201 was declared inoperable, Action Request A165365 (RT 21274) was written to calibrate the component, the calibration has been included in the forced outage schedule and must be completed prior to entry into Mode 3, and the Nuclear Test Scheduler database has been updated. To address work practices and communications, a lessons learned document was distributed, a Human Performance Improvement program has been implemented, a TS Surveillance Program group is being formed to provide leadership and ownership, and a procedure change has been made to prevent undocumented procedure changes which affect critical parameters. There is no safety significance for the failure to calibrate the charging cross-flow indicator. Charging cross-flow indication is used to establish flow in the charging cross-tie piping, but other remote and local indications would identify whether adequate flow is maintained through the line. Failure to calibrate the charging cross-flow indicator would not have prevented the charging cross-tie from performing its function.														



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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		98	--	036	--	00

Cook Nuclear Plant Unit 1

50-315

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

Conditions Prior to Event

Unit 1 was in Mode 5, Cold Shutdown

Unit 2 was in Mode 5, Cold Shutdown

Description of Event

On July 23, 1998, during a verification of Technical Specification (TS) surveillance requirements, it was discovered that the "Unit 1 To And From Unit 2 Chemical Volume Control System Charging Pump Discharge Cross-tie Flow Indicator," 12-QFI-201, had not been surveillance tested since August 12, 1992. TS 4.3.3.5.1, Table 4.3-6a, Item 11 requires calibration of this charging cross-flow indicator at least once every 549 days. Therefore, the charging cross-flow indicator, 12-QFI-201, had been inoperable since June 29, 1994.

Cause of Event

The root cause of the failure to calibrate the charging cross-flow transmitter, as required by TS requirement 4.3.3.5.1, was work practices, due to failure to follow procedures:

Failure to issue a Preventive Maintenance Change Request (PMCR) as required by procedure PMP5030.001.003, "Preventive Maintenance."

Failure to enter the new procedure into the Nuclear Test Scheduler (NTS) database, as required by procedure PMP4030.NTS.001, "Use of the Nuclear Test Scheduler (NTS) Computer Program."

A contributing cause was lack of effective communications between the Maintenance Procedure Writer and the Preventive Maintenance (PM) group.

The investigation conducted for this LER revealed that 12-QFI-201 was originally calibrated under procedure 1IHP6030.IMP.146, "Pressurizer Level Cold Calibration." In early 1994, 12-QFI-201 was removed from this procedure as part of procedural upgrades performed in response to Design Change RFC-2985 (Protection & Control System upgrade). Specifically, 12-QFI-201 was removed from IHP6030.IMP.146, Revision 7. Revision 7 was approved on February 11, 1994. Procedure 12IHP6030.IMP.092, "Charging Header Cross-Flow Indication Calibration," Revision 0, was written and approved on January 27, 1994 to perform the calibration of 12-QFI-201. In addition to these procedural changes, 12-QFI-201 was removed from the associated recurring task (RT 4848) which controlled the periodic calibration of several other components under procedure 1IHP6030.IMP.146. However, a new recurring task was not written to perform procedure 12IHP6030.IMP.092, and no entry was made into the NTS database as required under procedure PMP4030.NTS.001. Because of these and other contributing factors, 12-QFI-201 was not calibrated after 1992, resulting in a violation of Technical Specification 4.3.3.5.1, Table 4.3-6a, Item 11.

The failure to calibrate the charging cross-flow indicator was identified as a result of corrective actions being performed for a commitment in a previous Condition Report (CR 98-1181) to perform a line-by-line review of procedure PMI-4030, "Technical Specification Review and Surveillance," TS responsibilities. Some of the problems identified in this Licensee Event Report (LER) investigation were similar in nature to those identified in Condition Report 98-1181. Specifically, the following problems were identified (with actions in progress to correct):

- Poor coordination and communication between departments;
- Acceptance of memory and workarounds in lieu of adherence to programmatic requirements;
- A disconnect between Technical Specification requirements and procedure requirements; and,
- The need for manual intervention to coordinate schedules.

LICENSEE EVENT REPORT (LER)
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TEXT (If more space is required, use additional copies of NRC Form (366A) (17))

Analysis of Event

This LER is submitted in accordance with 10CFR50.73(a)(2)(i)(B), for a condition prohibited by the plant's Technical Specifications.

There is no safety significance for the failure to calibrate the charging cross-flow indicator. The charging cross-flow indicator provides local readout of flow through the charging cross-tie piping. In the event of an 10CFR50 Appendix R event in one unit requiring shutdown from outside the Control Room, the cross-tie piping can be used as an alternate flow path from the opposite unit to provide Reactor Coolant Pump seal injection flow and make-up water to maintain water level in the Pressurizer. Charging cross-flow indication is used to establish flow in the piping, but other remote and local indications would identify whether adequate flow is maintained through the line. Failure to calibrate the charging cross-flow indicator would not have prevented the charging cross-tie from performing its function.

Corrective Actions

Upon discovery of this condition, 12-QFI-201 was declared inoperable. Action Request A165365 (RT 21274) has been written to calibrate the component on a refueling outage basis. The calibration has been included in the Unit 1 forced outage schedule and must be completed prior to entry into Mode 3. NTS has been updated to reflect the requirement to calibrate 12-QFI-201 prior to entry into Mode 3 on a refueling basis.

This event is related to the problems found in Condition Report 98-1181. Additional corrective actions are being completed separately as a result of the investigation from Condition Report 98-1181:

Technical Specification surveillances have been reviewed and verified to ensure all Technical Specification requirements are contained in an active surveillance procedure, procedures for selected restart systems are adequate, and all surveillances are current.

Line Management held a meeting with PM group personnel to communicate the expectations for strict procedural use and adherence.

PM group personnel reviewed the requirements of procedure PMP4030.NTS.001 to ensure familiarization with the procedure and to reinforce strict compliance.

Failed Component Identification

Not Applicable

Previous Similar Events

LER 50-315/93-010-00

LER 50-315/94-014-00