

# CATEGORY 1

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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315  
 AUTH. NAME      AUTHOR AFFILIATION  
 WEBER, L.      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 98-039-00: on 980824, discovered that EOP procedural step  
 conflicts with SBLOCA. Cause indeterminate. Licensee will  
 updated LER by 981116.

DISTRIBUTION CODE: IE22T      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 2  
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Indiana Michigan  
Power Company  
Cock Nuclear Plant  
One Cook Plant  
Bridgman, MI 49106  
616 465 5501



September 22, 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:

98-039-00

Sincerely,

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

J. R. Sampson  
Site Vice President

/mbd

Attachment

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

9809280272 980922  
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S PDR





Y



## 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 20535-0001, 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 1
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TITLE (4) Interim LER - Emergency Operating Procedural Step Conflicts with Small Break LOCA Analysis
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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	
08	24	98	98	-- 039	-- 00	09	22	98	Cook Unit 2	50-316	
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)		50.73(a)(2)(i)	50.73(a)(2)(viii)	
			20.2203(a)(1)				20.2203(a)(3)(i)		X 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. Larry Weber, Operations Manager								TELEPHONE NUMBER (Include Area Code) 616/465-5901 x2443		

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
X	YES	(If Yes, complete EXPECTED SUBMISSION DATE).					11	16	98
	NO								

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

On August 24, 1998 with Unit 1 and Unit 2 in Cold Shutdown, during a review of the current revision to the Emergency Operating Procedure (EOP), "Transfer to Cold Leg Recirculation," it was identified that the EOP contained a step that may not satisfy the assumptions made in the Westinghouse analysis for a small break loss of coolant accident (LOCA) at the point when Safety Injection (SI) pump flow would be delivered to the reactor core. The EOP procedure step requires the high head SI pumps to be turned off if Reactor Coolant System (RCS) pressure exceeds 1250 psig (1000 psig for adverse containment condition) with the pump minimum flow line returning SI pump flow to the refueling water storage tank (RWST) isolated. The high head SI pumps are turned off to prevent pump damage if they are not delivering the minimum required flow to prevent such damage. This would only leave the centrifugal charging pumps to deliver flow to the reactor in the event of a small break LOCA where the RCS remained at high pressures. The Westinghouse analysis assumed SI pump flow would occur whenever the RCS pressure is less than 1350 psig. When instrument uncertainty associated with indicated RCS pressure is considered, the step to terminate SI in the procedure could place the plant in an unanalyzed condition outside of the conditions assumed in the safety analysis whenever a small break LOCA occurs and the RCS pressure is less than 1350 psig. An ENS notification was made on August 24, 1998 at 1705 hours EDT in accordance with 10CFR50.72(b)(2)(i). This interim LER is therefore submitted under 10CFR50.73(a)(2)(ii) for an unanalyzed condition.

Westinghouse is currently evaluating the significance of the event. Based on the results of the evaluation an analysis is expected to provide recommendations on the adequacy of the EOPs and whether the condition reported represents an unanalyzed condition. It is anticipated that an update to this LER will be submitted by November 16, 1998.