

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9811090049 DOC. DATE: 98/11/02 NOTARIZED: NO DOCKET #
 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 98-044-00: on 981001, offsite power availability was not
 verified as required by TS surveillance. Caused by
 inadequate procedure that governed document changes. Revised
 appropriate surveillance procedures. With 981102 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD3-3 PD	1 1	STANG, J	1 1
INTERNAL: AEOD/SPD/RAB	2 2	AEOD/SPD/RRAB	1 1
<u>FILE CENTER</u>	1 1	NRR/DE/ECGB	1 1
NRR/DE/EELB	1 1	NRR/DE/EMEB	1 1
NRR/DRCH/HICB	1 1	NRR/DRCH/HOHB	1 1
NRR/DRCH/HQMB	1 1	NRR/DRPM/PECB	1 1
NRR/DSSA/SPLB	1 1	RES/DET/EIB	1 1
RGN3 FILE 01	1 1		
EXTERNAL: L ST LOBBY WARD	1 1	LITCO BRYCE, J H	1 1
NOAC POORE, W.	1 1	NOAC QUEENER, DS	1 1
NRC PDR	1 1	NUDOCS FULL TXT	1 1

NOTE TO ALL "RIDS" RECIPIENTS:
 PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS
 OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL
 DESK (DCD) ON EXTENSION 415-2083

FULL TEXT CONVERSION REQUIRED
 TOTAL NUMBER OF COPIES REQUIRED: LTTR 22 ENCL 22

AD4



Indiana Michigan
Power Company
Cook Nuclear Plant
One Cook Plant
Bridgman, MI 49106
616 465 5901



November 2, 1998

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

Operating License 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:

LER 98-044-00, "Offsite Power Availability Not Verified as Required by Technical Specification Surveillance".

Sincerely,

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

J. R. Sampson
Site Vice President

Jmbd

Attachment

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

9811090049 981102
PDR ADOCK 05000315
S PDR

IE22 1/1

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) Offsite Power Availability Not Verified as Required by Technical Specification Surveillance
--

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		
10	01	98	98	--	044	--	00	11	02	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)		00	20.2201 (b)				20.2203(a)(2)(v)				X 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. 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
YES (If Yes, complete EXPECTED SUBMISSION DATE).	X	NO							

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

On October 1, 1998, during a review of Technical Specification (TS) surveillance requirements for the offsite electrical power sources by engineering, it was discovered that the availability of the preferred offsite power source was not being verified in accordance with TS 4.8.1.1.a. Specifically, the surveillance procedure did not require verification of breaker alignment and voltage reading for the preferred offsite power source. The TS requires that each of the circuits between the offsite electrical power sources, preferred and alternate offsite power sources, and the onsite 4 kV electrical distribution system be determined operable at least once per 7 days by verifying correct breaker alignments and indicated power availability. In accordance with 10CFR50.73(a)(2)(i)(B), this LER is being reported as a condition prohibited by the plant's Technical Specifications.

The root cause for this condition was an inadequate procedure that governed document changes. The instruction that governed the procedure change process in 1992 did not provide adequate guidance and expectations to the Operations personnel for the review of changes made to plant procedures and their supporting documentation. The appropriate surveillance procedures have been revised. Recent improvements in the procedure revision process have been made which include the issuance of an Operations Department document revision procedure.

The failure to perform the required surveillance was evaluated. It was determined that not verifying the breaker alignment and voltage availability of the preferred offsite source had no safety significance.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER(2)	LER NUMBER (6)					PAGE (3)
		YEAR	SEQUENTIAL NUMBER		REVISION NUMBER		2 of 3
		98	--	044	--	00	

Cook Nuclear Plant Unit 1

50-315

2 of 3

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 October 1, 1998, during a review of Technical Specification (TS) surveillance requirements for the offsite electrical power sources by System Electrical Engineering, it was discovered that the availability of the preferred offsite power source was not being verified in accordance with TS 4.8.1.1.1.a. Specifically, surveillance procedures 1/2 OHP 4030.STP.031, "Operation Weekly Surveillance Checks," did not require verification of breaker alignment and voltage reading for the preferred offsite power source. The TS requires that each of the circuits between the offsite electrical power sources, 34.5 kilovolt (kV) preferred and alternate 69 kV offsite power sources, and the onsite 4 kV electrical distribution system be determined operable at least once per 7 days by verifying correct breaker alignments and indicated power availability.

An investigation discovered that prior to 1992, surveillance procedures 1/2 OHP 4030.STP.031 did not include steps to verify correct breaker alignment and power availability for either the preferred or alternate offsite power sources, as required by TS 4.8.1.1.1.a. A revision of the surveillance procedures in 1992 added steps to verify correct breaker alignment and power availability for the offsite power sources. However, the procedure revision only included verification of correct breaker alignment and power availability for the alternate offsite power source. The same requirements for the preferred offsite power source were not added. As a result, the requirements of TS 4.8.1.1.1.a were not fully met.

Cause of Event

The root cause for this condition was an inadequate document change procedure. The instruction that governed the procedure change process in 1992, Procedure Group Guideline 003.002, "Procedure Change Sheets," did not provide adequate guidance and expectations to the Operations Department for reviewing changes made to plant procedures and their supporting documentation. Additionally, no formal documentation of completed procedure change reviews was required.

The surveillance requirement has existed since the TS were originally issued. It could not be determined why the verification steps were never included in the surveillance procedure up until 1992.

Analysis of Event

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

The 4 kV electrical distribution system design at D.C. Cook consists of two subsystems: the 4 kV safety-related and non-safety related distribution systems. The safety-related system is designed to ensure a continuous supply of electrical power to all essential plant equipment during normal operation and under abnormal plant conditions. The 4 kV safety-related system buses can receive power from four sources: the non-safety related unit auxiliary transformers (UAT), the 34.5 kV preferred offsite power, the emergency diesel generator system, or the 69 kV alternate offsite power source. During normal operations, the main generator supplies power to the 4 kV non-safety related buses through the UATs. During plant start-up or shutdown, the 34.5 kV preferred offsite source supplies power to the 4 kV non-safety related buses through the reserve auxiliary transformers 101/201AB and 101/201CD. The non-safety related buses then supply power to the four 4 kV safety-related buses.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER(2)	LER NUMBER (6)					PAGE (3)
		YEAR	SEQUENTIAL NUMBER			REVISION NUMBER	
		98	--	044	--	00	

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

Analysis of Event (cont'd)

To ensure the availability of these offsite power sources, TS 4.8.1.1.1.a requires that each of the circuits between the offsite power sources and the onsite 4 kV electrical distribution system be determined operable at least once per 7 days by verifying correct breaker alignments and indicated power availability. Although procedures 1/2 OPH 4030.STP.031 did not include a step to verify the availability of the 34.5 kV preferred offsite power source, there are indication lights on the control room electrical panels which indicate power available to the 101/201AB and 101/201CD reserve auxiliary transformers. When these lights are lit, they provide indication that power is available from the 34.5 kV preferred offsite source. During shift turnover, control room panel walkdowns are conducted between the oncoming and offgoing shifts. Also, as part of regular control room operator duties, walkdowns of these panels are performed once per shift. It is reasonable to assume that the operators would have identified this condition during panel walkdowns.

Based on the above, it was determined that not verifying the breaker alignment and voltage availability of the preferred offsite source had no safety significance.

Corrective Actions

Procedures 1/2 OHP 4030.STP.031, "Operation Weekly Surveillance Checks," were revised to include verification of the voltage upstream of the offsite reserve auxiliary transformers 101/201AB and 101/201CD, as required by TS 4.8.1.1.1.a.

Recent improvements in the procedure revision process have been made which include the issuance of OPM.001, "Operations Department Document Revision Manual." This manual provides detailed instruction regarding the procedure change, review and approval process. Recent additions to the manual have included the addition of a procedure revision checklist, which is required to be completed for all procedure changes and revisions. The checklist requires the procedure reviewer to address specific questions related to the document change and to formally document the results of the review.

A comprehensive assessment of the plant's surveillance program is currently being performed as part of the Restart Plan. This assessment will be completed prior to restart of either unit. Specific actions that arise from this assessment will be communicated to the NRC during the restart process.

Failed Component Identification

Not Applicable

Previous Similar Events

None