

## 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)

05000-315

PAGE (3)

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TITLE (4)

Failure to Perform Technical Specification Surveillance Test for Pressurizer Power Operated Relief Valves

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	
01	12	1999	1999	--	002	--	00	02	11	1999	
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 n 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. Donald Kosloff, Licensing Engineer

TELEPHONE NUMBER (Include Area Code)

616/465-5901, X2129

## COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

## SUPPLEMENTAL REPORT EXPECTED (14)

EXPECTED  
SUBMISSION  
DATE (15)

MONTH

DAY

YEAR

X YES  
(If Yes, complete EXPECTED SUBMISSION DATE).

NO

03

25

1999

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

On January 13, 1999, with Unit 1 depressurized in Mode 5, surveillance test section personnel determined that the reactor coolant system pressurizer power operated relief valves (PORVs) had not been tested as required by Technical Specification (TS) Surveillance Requirements 4.4.9.3.1a. and 4.4.9.3.1e.2.(a) for low temperature overpressure (LTOP) mitigation. The related surveillance procedure was required to be performed by January 10, 1999, but was not completed until January 13, 1999. Because of the missed surveillance the LTOP PORVs had become inoperable on January 10, 1999. Since the operators were not initially aware of the missed PORV surveillance, all actions required by TS 3.4.9.3 for inoperable PORVs had not been taken within the allowed Action times for the Limiting Condition for Operation. As the surveillance requirements had not been met, this event is reportable as operation prohibited by the plant's TS.

Inadequate scheduling controls allowed two personnel errors to cause the event. After determining the surveillance procedure due date by using the Nuclear Plant Maintenance (NPM) computer system, a surveillance scheduler failed to verify the NPM due date against the Nuclear Test Scheduler (NTS) computer scheduled due date. The NPM due date was wrong because data had not been entered correctly for the previous (December 1998) surveillance. This caused NPM to generate an erroneous surveillance due date of January 15, 1999. As corrective action, additional direct management oversight was instituted to verify that all TS surveillances are current and to improve the accuracy of future surveillance scheduling. This included emphasis on personal accountability standards and proper use of NTS. The root cause investigation for this event has not been completed. It is anticipated that, if significant changes to the LER are identified as a result of completion of the root cause investigation, an update to this LER will be submitted by March 25, 1999. At the time of the event the unit was depressurized, both LTOP PORVs remained capable of performing their safety functions, and one PORV was open (although not blocked open) for pressure control, therefore this event had no safety significance.



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		1999	--	002	--	00

Cook Nuclear Plant Unit 1

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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, depressurized

**Description of Event**

On January 13, 1999, with Unit 1 in Mode 5, Operations requested the surveillance section to verify how much grace time was available for performance of surveillance test procedure 01-IHP 4030.STP.089, "Pressurizer Power Operated Relief Valve Cold Over-pressurization Bi-stable and Backup Air Pressure System Functional Test." Surveillance test section personnel then determined that the reactor coolant system (RCS) pressurizer power operated relief valves (PORVs) had not been tested at the frequency required by Technical Specification (TS) Surveillance Requirements (SR) 4.4.9.3.1a. and 4.4.9.3.1e.2.(a) for low temperature overpressure (LTOP) mitigation. These TS SR must be performed to verify PORV operability in accordance with TS Limiting Condition for Operation (LCO) 3.4.9.3 in Mode 5 when the temperature of any RCS cold leg is less than or equal to 152 degrees F and the RCS is not vented through a 2-square-inch or larger vent, or through any single blocked-open PORV. SR 4.4.9.3.1a requires the performance of a channel functional test on an LTOP PORV actuation channel at least once per 31 days when the PORV is required to be operable. SR 4.4.9.3.1e.2.(a) is required to determine that the PORV emergency air tank is operable by verifying air tank pressure instrumentation is operable by performing a channel functional test at least once per 31 days.

Surveillance procedure 01-IHP 4030.STP.089 was required to be performed by January 10, 1999. It was not performed until January 13, 1999. Because of the missed surveillance, the PORVs became inoperable on January 10, 1999. Since the operators were not initially aware of the missed PORV surveillance, the actions required by TS 3.4.9.3 for inoperable PORVs were not taken within the allowed LCO action time of 24 hours for restoration of the inoperable PORVs or, if the inoperable PORVs were not restored to operability, within the allowed LCO action time of 32 hours for venting of the RCS through at least a 2-square-inch vent, or through any single blocked open PORV.

Upon discovery of the missed surveillance, plant management determined that the LTOP PORVs could be promptly restored to operable status by completing the surveillance procedure. The surveillance was completed and the PORVs were declared operable at 21:35 hours on January 13, 1999. This was the most expeditious way to exit the LCO action statement. The completed surveillance indicated that the PORVs had remained capable of performing their safety function during the period from January 10 to January 13 while they were considered inoperable. The RCS remained depressurized during this period.

**Cause of Event**

Preliminary investigation indicated that inadequate scheduling controls had allowed two personnel errors to cause the event. After determining the surveillance procedure completion due date by using the Nuclear Plant Maintenance (NPM) computer system, an instrument and controls surveillance scheduler failed to verify the due date from the NPM system computer data base against the Nuclear Test Scheduler (NTS) system computer data base scheduled due date. The NPM-scheduled due date was wrong because of improperly entered data related to completion of the previous (December 1998) surveillance. When the data was entered in NPM for the previous surveillance the "class code" field displayed on the computer screen had a correct entry which indicated that the surveillance procedure was the primary job order activity (JOA). However, there was no entry in the "PRIMARY JOA" field on the primary activity computer display screen. "YES" should have been entered in the "PRIMARY JOA" field of the primary activity screen. The "YES" entry would have activated the NPM computer program to generate a due date for the next surveillance, based on the date that the primary job order activity, the surveillance, was completed. Since there was no entry in the "PRIMARY JOA" field, NPM generated an erroneous due date of January 15, 1999, based on final close-out of other job order activity on December 15, 1998, for completion of the next surveillance. The NTS data base indicated the correct surveillance completion due date for January. The actual December surveillance completion date had been entered correctly in the NTS data base by a clerk using the date of completion from the completed December 1998 surveillance procedure.



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

## Cause of the Event (continued)

The root cause investigation for this event has not been completed. Additional corrective actions may be developed based on the results of the root cause investigation. It is anticipated that, if significant changes are identified as a result of completion of the root cause investigation, an update to this LER will be submitted by March 25, 1999.

Analysis of Event

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

The operability of two PORVs, or of one PORV and the residual heat removal (RHR) safety valve, ensures that the RCS will be protected from low temperature pressure transients when one or more of the RCS cold legs are less than or equal to 152 degrees F. Either LTOP PORV or the RHR safety valve has adequate relieving capability to protect the RCS from overpressurization due to postulated transients. Such transients include the start of an idle reactor coolant pump with the secondary water temperature of the steam generator less than or equal to 50 degrees F above the RCS cold leg temperature and the start of a charging pump and its injection to a water solid RCS. At the time of the event the RCS was depressurized, one PORV was open for pressure control, but not blocked, and the RHR safety valve was operable. Also, on January 13, 1999, surveillance testing of the LTOP PORVs indicated that the PORVs had remained capable of performing their safety functions during the event. Therefore this event had no safety significance.

Although this event only affected Unit 1, the same scheduling programs are used for both units.

Corrective Actions

The surveillance procedure was completed and the PORVs were declared operable at 21:35 hours on January 13, 1999.

Additional direct management oversight was instituted for current TS surveillance status and future TS surveillance scheduling. The plant accountability policy was applied to the surveillance scheduler who made the surveillance test scheduling error because he had not followed procedure by failing to validate the schedule dates in the NPM data base against the schedule dates in the NTS data base. The Integrated Scheduling Manager issued "Lessons Learned" to all schedulers to remind them to use the controlled data bases to establish due dates when scheduling TS surveillance tests. A review of all current plant TS surveillance requirements verified that all required TS surveillances were current for both units. The surveillance test section is now performing parallel tracking of scheduled TS surveillance test activities for both units. Duration of the parallel tracking will be determined based on future evaluation.

The root cause investigation for this event has not been completed. Additional corrective actions may be developed based on the results of the root cause investigation. It is anticipated that, if significant changes are identified as a result of completion of the root cause investigation, an update to this LER will be submitted by March 25, 1999.

Previous Similar Events

315/96-003-00  
315/94-010-00  
315/92-004-00  
315/91-011-00  
315/91-002-00  
315/90-011-00  
315/90-005-00  
316/90-005-00  
315/89-011-00