



## Nebraska Public Power District

COOPER NUCLEAR STATION  
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321  
TELEPHONE (402) 825-3811

CNSS948120

April 22, 1994

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Dear Sir:

Cooper Nuclear Station Licensee Event Report 92-020 is forwarded as an attachment to this letter.

Sincerely,

*R. L. Gardner*  
R. L. Gardner  
Plant Manager

RLG/nc

Attachment

cc: L. J. Callan  
G. R. Horn  
J. M. Meacham  
R. E. Wilbur  
V. L. Wolstenholm  
D. A. Whitman  
INPO Records Center  
NRC Resident Inspector  
R. J. Singer  
CNS Training  
CNS Quality Assurance

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PDR ADDCK 0500029B  
S PDR

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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 INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 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)  
COOPER NUCLEAR STATIONDOCKET NUMBER (2)  
05000298PAGE (3)  
1 OF 3

TITLE (4) Technical Specification Violation for Inoperable Primary Containment Surveillance Instruments

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	30	92	92	-- 020 --	00	04	22	94	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
POWER LEVEL (10)	100	77.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)	
		20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)	
		20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER	
		20.405(a)(1)(iii)		X 50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)	
		20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)			
		20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)			

## LICENSEE CONTACT FOR THIS LER (12)

NAME

John R. Myers

TELEPHONE NUMBER (Include Area Code)

(402) 825-3811

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS

## SUPPLEMENTAL REPORT EXPECTED (14)

YES  
(If yes, complete EXPECTED SUBMISSION DATE).

X NO

EXPECTED  
SUBMISSION  
DATE (15)

MONTH DAY YEAR

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

During an Operational Safety Team Inspection in November 1993, a condition was identified where Technical Specifications required Primary Containment narrow range level instruments PC-LI-12 and PC-LI-13 were sequentially removed and re-installed on January 30, 1992, without being declared inoperable. The appropriate Technical Specification LCO was not entered. This condition was determined to be reportable during the investigation of the inspection findings. A subsequent review of maintenance work requests for related instruments identified two additional instances, one in 1987 and one in 1990, where instruments were not declared inoperable in accordance with Technical Specifications.

These events resulted from personnel not recognizing the instruments as being Technical Specification instruments, thus failing to declare the components inoperable and implement the required actions, as required by station procedures. Tailgate sessions with Instrument and Control technicians and training for licensed operators were initiated to discuss the instrument and LCO statements in Technical Specification sections 3.1 (Reactor Protection System) and 3.2 (Protective Instrumentation). As long term corrective action, an evaluation of the work control process is in progress to identify changes which will assist personnel in recognizing Technical Specification components. The feasibility of identifying Technical Specification components in the plant configuration computer database will also be evaluated.

LICENSEE EVENT REPORT (LER)  
TEXT 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 (MNRB 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)		DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
COOPER NUCLEAR STATION		05000298	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
			92	-- 020 --	00	

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

A. Event Description

During an Operational Safety Team Inspection (OSTI) in November, 1993, a condition was identified where Technical Specification required Primary Containment narrow range level instruments PC-LI-12 and PC-LI-13 were sequentially removed and re-installed on January 30, 1992, without being declared inoperable. While reviewing this finding, it was determined that appropriate post maintenance testing was not conducted until January 31. During this testing, calibration of PC-LI-12 was required; however, PC-LI-13 was found within tolerance. The instruments were not declared inoperable, which resulted in not entering the Technical Specification LCO, and therefore the appropriate action statement was not followed. Technical Specification Table 3.2.F, Primary Containment Surveillance Instrumentation, requires, with both channels inoperable, that the indication be restored within six hours or the Reactor be in Hot Shutdown within the following six hours and in Cold Shutdown in the following 18 hours.

A subsequent review of work requests for instruments on this Technical Specification table identified two additional instances where instruments were not declared inoperable and Technical Specification action statements were not followed. On March 16, 1987, Primary Containment drywell pressure recorder PC-PR-1B (green pen) was found to be oscillating. A replacement recorder was installed until March 27, at which time the original recorder, following testing, was re-installed and placed back in service. A few days later oscillations were again noted and monitored. The replacement recorder was re-installed on July 14. Post maintenance testing was performed on July 21. Technical Specification Table 3.2.F requires a special report if the instrument is out of service for more than 30 days.

On January 25, 1990, work was authorized on Primary Containment wide range level recorder PC-LR-1A. Between that date and March 31, troubleshooting and repair efforts continued. The transmitter was replaced on March 31, and post maintenance testing completed satisfactorily. Technical Specification Table 3.2.F requires a special report if the instrument is out of service for more than 30 days.

B. Plant Status

The plant was in various modes of operation when these violations occurred.

C. Basis for Report

Failure to comply with the requirements of Technical Specifications, reportable in accordance with 10CFR50.73(a)(2)(i). This condition was determined to be reportable during the detailed investigation of the OSTI findings.

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TEXT CONTINUATION

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COOPER NUCLEAR STATION		05000298		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 3
				92	-- 020 --	00	

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

D. Cause

Personnel failed to recognize the instruments as being Technical Specification instruments, and thus failed to declare the components inoperable and implement the required actions, as required by station procedures.

E. Safety Significance

As demonstrated by post maintenance testing, PC-LI-13 was properly functioning upon its re-installation. Primary Containment level is indicated in the Control Room on eight different level recorders and indicators, and is available on the Plant Management Information computer system (PMIS). Primary Containment pressure is indicated on six different pressure recorders of various ranges, and is available on PMIS. These instruments do not control any active safety functions, but provide indication and annunciation. These indications are available from redundant instruments, although in the case of PC-LI-12 and PC-LI-13, the redundant instruments are a wider range (-4 feet to +6 feet, as opposed to +/-10 inches).

F. Safety Implications

The safety aspects of these events are fully covered in "Safety Significance" above.

G. Corrective Action

As immediate corrective action upon discovery, tailgate sessions with Instrument and Control technicians and training for licensed operators were initiated to discuss the instrument and LCO statements in Technical Specification sections 3.1 (Reactor Protection System) and 3.2 (Protective Instrumentation). An evaluation of the work control process is in progress to identify changes which will assist personnel in recognizing Technical Specification components before they are removed from service. Additionally, an evaluation of the feasibility of identifying Technical Specification components in the plant configuration computer database will be conducted.

H. Similar Events

LER 93-037, Failure to Declare the Control Room Emergency Filter System Inoperable Prior to Initiating Maintenance on a Fire Door, discusses a related situation.