

Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS960087

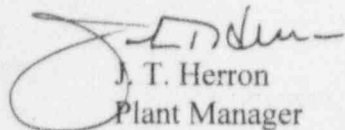
May 8, 1996

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555-0001

Dear Sir:

Cooper Nuclear Station Licensee Event Report 96-004 is forwarded as an attachment to this letter.

Sincerely,


J. T. Herron
Plant Manager

/crm

Attachment

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution

INPO Records Center

W. Turnbull
MidAmerica Energy

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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)

COOPER NUCLEAR STATION

DOCKET NUMBER (2)

05000298

PAGE (3)

1 OF 3

TITLE (4)

Failure to Perform Surveillance within Required Surveillance Interval

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
04	09	96	96	-- 004	-- 00	05	08	96	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		097	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

Chris R. Moeller, Senior Staff Licensing Engineer

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 NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On April 9, 1996, it was discovered that the monthly functional test for the Division 2 Intermediate Range Neutron Monitors (IRMs) was not completed within the required Technical Specification (TS) surveillance interval of thirty-one days plus 25 percent (seven days). While originally scheduled for March 26, 1996, the surveillance was removed from the work schedule when it was determined that the quarterly calibration and functional test surveillance (which also fulfills the monthly functional testing requirements) was scheduled for March 28, 1996. However, during the performance of the quarterly surveillance, IRM B was determined to be inoperable and the surveillance was terminated. At this point, the monthly surveillance should have been immediately rescheduled to meet the March functional testing requirements for the remaining operable IRMs (D, F, and H), but it was not. The monthly functional test was subsequently completed on April 9, 1996, approximately 5 days after the window for the TS surveillance interval had expired. When discovered, the plant was at full power operation.

The cause classification for this condition is Management/Quality Assurance Deficiency (NUREG 1022, Appendix B, Cause Code E.) As a result of weaknesses in the computerized surveillance tracking program, the Division 2 surveillances were being tracked manually as an interim action until an enhanced tracking program can be implemented. While controls exist in the computer program to prevent the surveillance tests from being dropped, these same controls were not applied to the interim manual tracking program. Consequently, when the monthly test was dropped from the schedule in favor of quarterly test, there was no flag set in the manual tracking program to ensure that the monthly functional testing requirements were met. Since the condition was identified following a subsequent completion of the monthly functional test, the plant was in compliance with the TS at the time of discovery. Immediate actions were taken to review past surveillances for similar occurrences; none were found. To prevent recurrence, other Division 2 surveillances susceptible to this scheduling error were input into the computerized tracking program. It is anticipated that the enhanced surveillance tracking computer program will be operational by June 1996.

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TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
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		96	-- 004	-- 00	

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

PLANT STATUS

At the time of discovery, the plant was at full power operation.

EVENT DESCRIPTION

On April 9, 1996, it was discovered that Surveillance Procedure (SP) 6.2IRM.302, "IRM Functional Test (Mode Switch In Run) (Div 2)," was not completed within the required Technical Specification surveillance interval of thirty-one days plus 25 percent (seven days). While originally scheduled for March 26, 1996, the surveillance was removed from the work schedule when it was determined that the quarterly calibration and functional test surveillance (which also fulfills the functional testing requirements of SP 6.2IRM.302) was scheduled for March 28, 1996. However, during the performance of the quarterly calibration and functional test surveillance (SP 6.2IRM.304, "IRM Calibration and Functional Test (Mode Switch In Run) (Div 2)"), Intermediate Range Neutron Monitor (IRM) B was determined to be inoperable and the surveillance was terminated. At this point, SP 6.2IRM.302 should have been immediately rescheduled to meet the March functional testing requirements for the remaining operable IRMs (D, F, and H), but it was not.

Assuming the March functional testing requirements to have been met via SP 6.2IRM.304, the monthly surveillance SP 6.2IRM.302 was next scheduled for, and satisfactorily completed on, April 9, 1996. During the post-surveillance review for this surveillance, it was noted that the previous completion date for SP 6.2IRM.302 was February 26, 1996. Based on this date, the Technical Specification surveillance interval for the March test ended on April 4, 1996. As a result, IRMs D, F, and H were technically inoperable from April 4, 1996, until SP 6.2IRM.302 was successfully completed on April 9, 1996.

CAUSE

This condition was caused by weaknesses in the computer program used to track and schedule surveillance tests. In 1994, a programmatic change was initiated to divisionally split the surveillance test procedures. (Previously the same procedure was used to surveillance test both divisions.) To facilitate this programmatic change, a new numbering methodology was adopted. Under this methodology, for example, SP 6.1.2A, "IRM Functional Test (Mode Switch In Run) (Div 1/Div 2)," was replaced with SP 6.1IRM.302, "IRM Functional Test (Mode Switch In Run) (Div 1)," and SP 6.2IRM.302 for Division 2. However, the surveillance tracking program would not accommodate the new numbering methodology. Since an enhanced surveillance tracking program was already under development, it was decided to track the Division 1 surveillance tests under the old number using the existing computer program and to manually track the Division 2 surveillance tests on an interim basis until the enhanced computer program became operational. While controls exist in the computer program to prevent the surveillance tests from being dropped, these same controls were not applied to the interim manual tracking program. Consequently, when SP 6.2IRM.302 was dropped from the schedule in favor of SP 6.2IRM.304, there was no flag set in the manual tracking program to ensure the monthly functional testing requirements were performed within the Technical Specification surveillance interval.

The cause classification for this condition is Management/Quality Assurance Deficiency (NUREG 1022, Appendix B, Cause Code E.)

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TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

SAFETY SIGNIFICANCE

This condition had minimal safety significance. As noted above, SP 6.2IRM.302 was successfully completed on April 9, 1996. Except for IRM B which had been previously declared inoperable as a result of SP 6.2IRM.304, no discrepancies were identified as a result of the surveillance. Therefore, while IRMs D, F, and H were technically inoperable due to the missed surveillance, they were capable of performing their intended safety function. However, as further detailed below, the plant was never at a power level that would have called the IRM safety function into play.

To ensure an adequate overlap in neutron monitoring capability is maintained during low power operation, a trip signal is generated if an IRM is up scale or inoperable and its companion Average Power Range Monitor (APRM) is down scale. This potential would only occur at a very narrow power range during reactor start up or shut down activities. Therefore, at power operation with the APRMs on scale, as was the case during this condition, this feature is no longer relied upon since adequate neutron monitoring capability is provided by the APRMs.

CORRECTIVE ACTIONS

Since the operability of IRMs D, F, and H had been reestablished with the successful completion of SP 6.2IRM.302, the plant was in compliance with the Technical Specification requirements at the time of discovery.

Immediate corrective actions were taken to review past surveillances for similar occurrences. None were found.

To prevent recurrence, other Division 2 surveillance procedures susceptible to this scheduling error (i.e., those where both a functional test procedure and a calibration and functional test procedure exist for the same system or equipment) were entered into the existing computer program. (As a result of a program change implemented late in 1995, the existing computer program was modified to accommodate the new procedure numbering methodology. However, the Division 2 surveillances were not entered at that time because the surveillance history for a procedure is lost with the assignment of a new number. This weakness is being addressed in the enhanced computer program.)

As previously noted, an enhanced surveillance tracking computer program which will address the weaknesses described in this report has been procured. It is anticipated that this program will be operational by June 1996.

PREVIOUS EVENTS

LER 88-020	Surveillance Procedure Not Preformed Within Required Surveillance Interval
LER 90-008, Rev. 1	Update On Surveillance Procedures Not Performed Within Required Intervals Due To Deficient Computer Scheduling Program And Personnel Error
LER 93-024	Failure To Perform A Required Surveillance Test While Shutdown Due To Ineffective Communications

Correspondence No: NLS960087

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

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