

AMERICAN ELECTRIC POWER Service Corporation



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AEP:NRC:00100

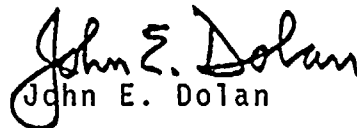
Donald C. Cook Nuclear Plant Units 1 & 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74

Mr. J. G. Keppler, Regional Director  
U.S. Nuclear Regulatory-Commission  
Office of Inspection and Enforcement  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Keppler:

This letter is in response to Mr. Gaston Fiorelli's letter dated October 4, 1978 which we received on October 6 and which transmitted to us IE Inspection Report Nos. 50-315/78-24; 50-316/78-22. Appendix A to that letter was a Notice of Violation citing three infractions and one deficiency. The attachment to this letter is the required response to the Notice.

Very truly yours,

  
John E. Dolan

JED:em  
attachment

cc: R. C. Callen  
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P. W. Steketee  
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Response to Notice of Violation Generated by IE Inspection  
Report Nos. 50/315/78-24; 50-316/78-22

Item 1 - Infraction

"Technical Specification 3.7.1.2 requires when in Modes 1, 2 and 3 that an inoperable auxiliary feedwater pump be restored to operable status within 72 hours or the plant be in Mode 4 within the next 12 hours.

Contrary to the above, results of the turbine driven auxiliary feedwater pump surveillance test conducted on June 7, 1978, in accordance with Technical Specification 4.7.1.2.a.1 indicated the pump to be inoperable with the plant in Mode 1 and the action required by Technical Specification 3.7.1.2 was not taken."

Explanation

The Surveillance Test Procedure being used by the Operator to test the turbine driven auxiliary feed pump was inadequate. The acceptance criteria of the procedure addressed only the requirements of Technical Specification 4.0.5 and did not include the specific criteria for Technical Specification 4.7.1.2.a.1. When the Operator performed the test he was unaware of the latter requirements.

Corrective Actions

Temporary changes to the procedures were made immediately after the discrepancy was found. The completely revised procedure was issued October 18, 1978. The procedure was revised to include the specific requirements of Technical Specification 4.0.5 (ASME Section XI requirements). Subsequent testing proved the pump was operable.

The procedure revisions include specific criteria for guidance of the Operator to determine if the turbine driven auxiliary feedwater pump is satisfactory with regard to pressure and flow. The procedure also includes acceptable ranges of vibration, lubrication and pump differential pressure. Providing this clear, concise, complete procedure will prevent recurrence.



A meeting was held October 20, 1978 with the Shift Operating Engineers to re-emphasize that Technical Specification requirements must be fulfilled and that if equipment does not meet the requirements, then immediate action must be taken to declare the equipment inoperable and action must be taken to restore the equipment to an operable condition within the required time frame or to follow the dictates of the Action Statements of the Technical Specifications.

Item 2 - Infraction

"Technical Specification 4.5.2.f.1 requires that the centrifugal charging pump be demonstrated operable every month by verifying the indicated discharge pressure to be  $\geq 2405$  psig during testing required by Technical Specification 4.0.5 (ASME Section XI testing).

Contrary to the above, testing conducted on April 11, 1978, as required by Technical Specification 4.0.5 did not verify discharge pressure to be  $\geq 2405$  psig due to a leaking pressure gauge (QPI-253) coupling and retesting was not conducted after corrective maintenance was completed on the gauge coupling on April 12, 1978."

Explanation

When the leaking gauge connector was found the Operator correctly submitted a job order to effect repairs. However; the Operator then mistakenly signed off the surveillance test instead of leaving it unsigned and marking it as incomplete testing on the Master Test Schedule.

Corrective Actions

The pump was retested after the error was found by the NRC inspectors and found to meet acceptance criteria.

The surveillance test procedure was also revised to fully incorporate the requirements of Tech. Spec. 4.5.2.f.1 and 4.0.5.

This event was discussed with the Operator involved and at a Shift Operating Engineers' meeting on October 20, 1978. At the meeting it was emphasized that if equipment does not meet acceptance criteria the test documentation is not to be signed off, the Master Surveillance Schedule is to be marked incomplete, action is to be taken to declare the equipment inoperable, and the Action Statements of the Technical Specifications are to be complied with.



Item-3 - Infraction

"Technical Specification 4.0.5 requires inservice testing of ASME Code Class 1, 2 and 3 pumps be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code 1974 Edition and Addenda through Summer 1975.

Contrary to the above,

- a. Records of inservice tests for the period January 20, 1978 through March 3, 1978 did not include the identification of instruments used, comparisons with allowable ranges of test values and analysis of deviations as required by Section XI, Subarticle IWP-6240."

Corrective Action

To preclude omissions of this data, procedure 12THP 4030.STP.022 entitled "ISI Pump Test Program" was issued on September 29, 1978. This procedure encompasses the following:

- a) Instrument calibration requirement;
- b) Allowable ranges of test data;
- c) The responsibility of evaluating accumulated data and directing subsequent action if deemed necessary.

Full compliance was achieved on September 29, 1978 when procedure 12THP 4030.STP.022 was approved and issued.

- b. "Records of inservice tests performed during the month of March 1978 on ECCS Train B were not accessible as required by Section XI, Subarticle IWP-6260."

Explanation

The testing of ECCS Train B was conducted on March 17, 1978, and signed off in the weekly surveillance log. Subsequent to this test the records were sent on their normal routing. However, to date the plant has been unable to locate these records.

Corrective Action

All personnel engaged in filing, transmitting, and using documents associated with the Master File have been briefed concerning personnel responsibilities in this area.

- c. "The August 22, 1978 results of a component cooling water pump 2W test and the August 8, 1978 results of an essential service water pump 2E test were in the "Required Action Range" of Table IWP-3100-2 of ASME Code Section XI and the pumps were not declared inoperable as required by Section XI, Subarticle IWP-3230. Several other examples were noted where test results were in the "Alert Range" of Table IWP-3100-2 and testing frequencies were not doubled as required by Subarticle IWP-3230."

Explanation

This discrepancy was due in part to the following: the data obtained were questioned by the ISI Supervisor and were being re-evaluated to determine a) the validity of the pump data obtained, or b) if the reference figures needed to be changed. Subsequent engineering reviews have determined that the data being generated were unsound.

Corrective Actions

This situation has been rectified by transferring the test responsibility to the Plant Performance Engineering Section effective October 1, 1978. The technical experience in this group better qualifies them to monitor and evaluate all aspects of the pump test program.

Subsequent to the reported audit, the component cooling water 2W pump was retested and proved operable. The essential service water 2E pump was also retested and proved operable upon renormalization of reference values based upon the pump manufacturer's test curve.

Item 4 - Deficiency

"Technical Specification 6.5.2.10.a requires minutes of each NSDRC meeting be prepared, approved and forwarded to the Senior Executive Vice President, Engineering and Construction, AEPSC, within 14 days following each meeting.

Contrary to the above, the minutes of NSDRC Meeting No. 18 conducted on April 6, 1978 were not prepared, approved and forwarded until July 18, 1978."

Corrective Actions

Additional staff has recently been hired in the Nuclear Safety and Licensing Section. At the same time, the extra workload due to Unit 2 startup has declined. A high priority has been assigned to the preparation of NSDRC meeting minutes to assure that the 14 day deadline is met for future meetings.

