

AMERICAN ELECTRIC POWER Service Corporation



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JOHN E. DOLAN

*Senior Executive Vice President
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December 21, 1978

AEP:NRC:00106

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

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 your letter dated November 9, 1978 which we received on November 13, 1978 and which transmitted to us IE Inspection Reports No. 50-315/78-27 and 50-316/78-31. Appendix A to your letter was a Notice of Violation citing two infractions. On November 13, 1978, Mr. R. F. Warrick of your office agreed by telephone to an extension until December 21, 1978 of the due date for our required reply. The required reply to the Notice of Violation follows.

INFRACTION A

"Technical Specification 6.8.1 requires procedures be implemented. PMI-2140, Bypass of Safety Functions: Jumpers, Grounds, Lifted Wire and Blocked Relay Control requires alarms which are blocked be approved and logged.

Contrary to the above, on August 29, 1978, the Unit 2 RWST piping for low temperature alarm was blocked without being approved and logged."

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1. Corrective Action Taken and Results Achieved

Since it was not possible to determine exactly who actually blocked the alarm, a new policy was instituted for blocking alarms effective September 12, 1978. This policy requires that the Unit Supervisor who is in charge of the Control Room remove all alarm blocks prior to getting relieved. This makes the individual in charge of the Control Room immediately responsible for all blocked alarms since there are no alarms blocked when a Unit Supervisor takes the responsibility for the Control Room. This has resulted in fewer alarms being blocked at any given time and a more complete record of blocked alarms that do exist.

2. Corrective Action To Be Taken to Avoid Recurrence

Since the number of blocked alarms has been reduced and all blocked alarms are accounted for by each eight hour shift, the responsibility for a blocked alarm which is not recorded is immediately placed and proper action can be taken. These actions will also identify alarms which are repetitively blocked and will enable us to investigate the cause and take appropriate action to eliminate the cause for the repetitive alarms.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved on September 12, 1978.

INFRACTION B

"Technical Specification 6.8.1 requires procedures be implemented. PMI-7030, 'Condition Reports' requires that condition reports be promptly initiated for events which may be reportable to external organizations.

Contrary to this requirement, Condition Reports were not promptly initiated for the inoperability of the Unit 2 AB diesel generator on June 14, 1978 and the opening of Unit 2 ice condenser doors on September 26, 1978."

1. Corrective Action Taken and Results Achieved

The Operations Superintendent met with all Shift Operating Engineers and the Production Supervisors - Operations to re-emphasize the need for promptly preparing Condition Reports when required and that during their review of logs they should question whether required reports were initiated. Also, the Unit Supervisors are now required to note in the Control Room Logs if they have initiated a Condition Report for any log entry which had the potential for placing the Unit in one of the Action Statements of the Technical Specifications. This will readily allow the log reviewer to determine whether or not a Condition Report was initiated for any item on the log.

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2. Corrective Action To Be Taken To Avoid Recurrence

Identifying log entries as to whether a Condition Report has been initiated will assist the log reviewer in determining if required reports were initiated and will also enable the reviewer to make direct contact with the Unit Supervisor if a Condition Report was not initiated. The log reviewer will then be able to take immediate action to instruct personnel in the proper manner of complying with instructions and to get a Condition Report initiated if it was not.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved on October 20, 1978.

Very truly yours,

John E. Dolan

John E. Dolan
Senior Executive Vice President,
Engineering

JED:em

cc: R. C. Callen
G. Charnoff
P.W. Steketee
R. J. Vollen
R. Walsh
D. V. Shaller -Bridgman
R. W. Jurgensen

