

AMERICAN ELECTRIC POWER Service Corporation



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JOHN E. DOLAN
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June 1, 1979
AEP:NRC:00199

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
Reply 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, Ill. 60137

Dear Mr. Keppler:

This letter is in response to Mr. Heishman's letter of May 8, 1979 which transmitted to us IE Inspection Reports No. 50-315/79-05 and 50-316/79-05. The following is our required response to the notice of violation generated as a result of the inspection report.

ITEM 1

"(Both Units) Technical Specification 6.8.1 requires implementation of written procedures. Procedures 12-OHP-4030 STP.035 "Locked or Sealed Valve Position Logging" requires certain valves to be logged as to position changes.

Contrary to the above, the position of valve 1-WD-230-7 was changed on March 28, 1979 without being logged as required."

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CORRECTIVE ACTIONS

Procedure 12-OHP 4030.STP.035 was revised to define more clearly the category of valves to which the locking and sealing requirements are applicable. In addition, the logs necessary to implement Procedure 12 OHP 4030.STP.035 have been made an integral part of the procedure. These changes became effective on April 18, 1979 when Rev. 3 to 12-OHP 4030.STP.035 was issued.

The Production Supervisor has instructed the Operating Personnel both verbally and in writing to review the requirements of and the changes to the procedure.

ITEM 2

"(Unit 1 only) Technical Specification 6.8.1 requires implementation of written procedures. Temporary change number 3 to 1-OHP 4021.032.001 "Starting, Loading, Paralleling and Shutting Down Diesel-Generators" requires an entry into the Jumper/Lifted Lead Log when pulling and replacing field flash fuses for diesel-generator starts. Contrary to the above, 1 CD diesel-generator was started on March 26, 1979 with no corresponding log entry."

DISCUSSION

Plant Manager Instruction PMI-2140, entitled "Bypass of Safety Functions, Jumpers, Grounds and Lifted Wire and Blocked Relays", waives the requirements for logging when the leads are temporarily lifted to perform operability testing. However, in an attempt to provide traceability of fuses pulled during the conduct of 1-OHP 4021.032.001, a Temporary Change Sheet was initiated which required that the pulling of the fuses be recorded in the log.

On March 26, 1979 a Unit 1 Diesel Generator was started and fuses were pulled by the operator supervising the test with no corresponding log entry. When the engine came up to speed, the operator immediately reinserted the fuses. This action was in full compliance with PMI-2140 which allows this type of temporary lifting of leads without logging. However, the instructions of Temporary Sheet 3 to 1-OHP 4021.032.001 were not followed by the Operator.



CORRECTIVE ACTIONS

The Operator was verbally reminded of the importance of complying with the requirements of the subject Procedure and all applicable Temporary Sheets.

After careful review by the Operations Superintendent and the Production Supervisor, it was deemed that the log entry requirement identified in Temporary Sheet 3 should be deleted. The deletion of this requirement insures that the instructions of PMI-2140 are uniformly applied to all procedures.

Issuance of a Temporary Sheet on May 25, 1979 eliminated the requirement of logging the removed fuses if the removal is of short duration and the person doing the test does not leave the area.

Very truly yours,

JED:em


John E. Dolan
Vice President

cc: R. C. Callen
G. Charnoff
R. W. Jurgensen
D. V. Shaller-Bridgman

