

9/19

# INDIANA & MICHIGAN POWER COMPANY

P. O. BOX 18  
BOWLING GREEN STATION  
NEW YORK, N. Y. 10004

July 31, 1979  
AEP:NRC:00231

Donald C. Cook Nuclear Plant Units 1 and 2  
Docket Nos. 50-315 and 50-316  
License No. 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, Illinois 60137

Dear Mr. Keppler:

This letter is written in response to Mr. R. F. Heishman's letter dated June 25, 1979 which transmitted to us IE Inspection Report Nos. 50-315/79-13 and 50-316/79-10 conducted by Messrs. K. R. Baker and K. E. Masse.

The Notice of Violation attached to Mr. Heishman's letter as Appendix A contained four infractions which resulted from these two inspection reports. Attachment A to this letter contains our responses to these infractions.

Very truly yours,

JED:em

Attachment

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

*John E. Dolan*  
John E. Dolan  
Vice President

AUG 6 1979

7910090477

## ATTACHMENT A

AEP:NRC:00231

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

### Response to Notice of Violation Resulting from IE Inspection Reports Nos. 50-315/79-13 and 50-316/79-10

#### Item 1 - Infraction

(Unit 2 only) Technical Specification 6.5.1.6.d requires the PNSRC to review proposed changes to equipment affecting nuclear safety. 10 CFR 50.59 requires a safety analysis prior to modification of safety related equipment.

Contrary to the above, after cooler drain valves were removed from 2AB and 2CD diesel generators without initiation of a facility design change or PNSRC review and approval.

#### Explanation

The Design Engineer issued instructions to the Plant stating that the diesel generator after cooler drains were to be kept open to the atmosphere at all times. Consequently, Temporary Change No. 1 to 2-OHP 4021.032.006 Rev. (2), "Emergency Diesel Generator Miscellaneous System Lineup", was issued June 27, 1978 stating that these drain valves were to remain open. However, since these valves were found closed on several occasions, they were removed not only to prevent the possibility that they might be closed but also because they were now unnecessary.

#### Corrective Action

A design change to remove the diesel generator after cooler drain valves from the flow diagram has been issued and approved by the PNSRC on June 19, 1979. Temporary Change No. 5 to procedure 2-OHP 4021.032.006 Rev (2) was issued on June 27, 1979 stating that these drain valves are to be deleted from the Procedure Checkoff Sheet (5.1-AB) since they have been removed. The corresponding procedure for Unit 1 has been revised in a similar manner.

#### Item 2 - Infraction

(Unit 2 only) Technical Specification 6.8.3.c requires review of temporary changes to procedures.

Contrary to the above, procedure 2-OHP 4030 STP.005 "ECCS Pumps Operability Test" (control room copy) contained a carbon copy of Change No. 7, dated February 5, 1979, with only the first level of review signed off. This change had not been reviewed by the PNSRC and approved by the Plant Manager as of May 9, 1979.

Explanation

Temporary Change No. 7 to procedure 2-OHP 4030 STP.005 "ECCS Pumps Operability Test", deleted the recording of the motor bearing temperature because of inaccessibility to the bearing with a pyrometer. Prior to presenting this temporary procedural change to the PNSRC, it was reviewed by the Plant Operations Supervisor who rejected it because it altered the intent of the procedure. Although he wrote "rejected" across the original Temporary Change Sheet including a note that an alternate method for measurement must be found, signed it, and returned it with a request to remove the carbon copy from the control room procedure, the carbon copy was not removed.

Corrective Action

Temporary Change No. 7 to procedure 2-OHP 4030 STP.005 has been removed.

Item No. 3 - Infraction

(Both Units) Technical Specification 6.8.1.2 requires procedures to be established, maintained and implemented.

Contrary to the above, numerous inconsistencies between drawings, procedures and as-built conditions were identified concentrated in the Safety Injection and Residual Heat Removal Systems. Errors indicate that procedures and associated valve lineups are inadequately maintained. Documented examples have been issued to the licensee.

Explanation

The drawings referred to in the inspection reports which do not reflect the as-built conditions are miniature flow diagrams which are issued for convenience only and with the full knowledge that they are not totally accurate. Plant Standing Order No. PMSO.014, issued November 4, 1975, emphasized this difference in the accuracy between miniature and full size drawings and also stressed that the full sized drawings (kept in the Shift Operating Engineer's Office) reflecting the current as-built conditions are to be used for all plant operations.

Corrective Action

All Safeguard Systems procedures have been reviewed and revised where required to remove any inconsistencies between the procedures and the as-built conditions. Other procedures are being revised to reflect as-built conditions as they are used.

Item No. 4 - Infraction

(Unit 2 only) Technical Specification 6.8.1 requires implementation of procedures.

Contrary to the above, an operator did not use Temporary Change No. 2 to (OHP) 4021.032.006 Revision 2, which would have changed the automatic voltage setting on 2AB diesel generator during a test run. Change No. 2 was a current, approved part of the procedure at the time.

Explanation

Use of Temporary Change No. 2 to 2-OHP 4021.032.006 Revision 2 was overlooked by the operator when using this procedure because there was no note in the body of the procedure where Temporary Change No. 2 applied referring to the use of it, as required by Plant Manager's Instruction No. 2010.

Corrective Action

The note referring to the use of Temporary Change No.2 was added to Procedure 2-OHP 4021.032.006 at the procedural step where it applies. All other operating procedures are being reviewed for this deficiency and appropriate notes are being added where required.

To preclude recurrence, Plant Manager's Instruction No. 2010 was reviewed with the operator stressing the necessity to reference the pertinent Temporary Change Sheet instruction in the body of the procedure at the step where it applies.