

**AMERICAN ELECTRIC POWER** *Service Corporation*



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July 11, 1979  
AEP:NRC:00224

Donald C. Cook Nuclear Plant Unit 1  
Docket No. 50-315  
License No. DPR-58  
Response to Notice of Violation

Mr. J. G. Keppler, Regional Director  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter provides the required response to the notice of violation attached as Appendix A to Mr. R. F. Heisman's letter dated June 13, 1979. The responses to Items 1 and 2 in the notice, cited as infractions, follow.

ITEM 1 - INFRACTION

"Technical Specification 6.5.1.6.d requires PNSRC review of proposed modifications to systems or equipment that affect nuclear safety.

Contrary to the above, the PNSRC did not review the modification made to the containment vessel which resulted in bolts being driven into the containment wall to anchor a sheet metal ice deflector and temporary roof shelter over the east steam and feedwater valve enclosure adjacent to the containment wall".

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ITEM 1 - CORRECTIVE ACTIONS

The installation of the ice deflector was covered under a Request For Change (RFC) in accordance with the American Electric Power Service Corporation (AEPSC) procedure for engineering design changes associated with the Donald C. Cook Nuclear Plant. The RFC was classified as non-safety-related because the proposed change was judged to have a negligible effect on the safety-related system. Although the judgment of negligible effect was sound, the RFC should have been classified as safety-related so that it would receive PNSRC review.

The cognizant AEPSC Design Division has been requested to review the effect of the RFC on the containment integrity and to recommend repair procedures if appropriate. The results of the Design Division review will be included in the RFC, which will then be reviewed by the PNSRC. To prevent recurrence, the parties involved in making design changes have been reminded in writing that modifications must be done according to the RFC procedure and that as part of this procedure all impacts, including specifically safety impacts, must be assessed in writing early in the process by the individuals designated in the procedure. The RFC procedure includes PNSRC review of the RFC's classified as safety-related.

The installation of the temporary roof had not been covered in an RFC. Upon discovery of the temporary modification to a safety-related structure without an RFC, a stop work order was issued and steps were taken to subject the proposed modification to the proper review procedures. In order to preclude recurrence, the Indiana & Michigan Power Company construction department sections and current construction contractors as of April 27, 1979 were advised in writing that no modification, either temporary or permanent, is ever to be made to a Class I structure without written approval from AEPSC.

ITEM 2 - INFRACTION

"Technical Specification 6.8.1 requires implementation of written procedures. Procedure 1 - OHP 4030 STP.005 requires the return to normal of valves positioned during the surveillance test.

Contrary to the above, the suction valve to a centrifugal charging pump was found in the closed position vice (sic) the required open position."

ITEM 2 - CORRECTIVE ACTION

- The valve was not returned as required to its open position because the operator who carried out the final valve alignment steps in the test procedure did not have the test procedure in hand as required by plant procedures. Instead, the operator who directed the performance of these steps had the procedure and initialed the steps as being completed. The two operators involved were verbally reprimanded for not having the procedure in hand as required and told that further violations of plant procedures could result in more severe disciplinary action.

To preclude recurrence, the shift operating engineers were instructed to review with their operators that suction valves on stand-by pumps are not normally closed and that certain identified procedures are required to be in hand when performed.

Very truly yours,

*John E. Dolan*  
John E. Dolan  
Vice Chairman

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