

# INDIANA & MICHIGAN POWER COMPANY

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

November 26, 1979

AEP:NRC:00302

Donald C. Cook Nuclear Plant Units 1 and 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 provides the required response to the Notice of Violation as Appendix A to Mr. R. F. Heishman's letter dated October 24, 1979.

## ITEM 1 - INFRACTION

"Technical Specification 6.5.1.6.e requires PNSRC investigation of all violations of Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Chairman of NSDRC.

Contrary to the above requirement, PNSRC did not review three recent IE Inspection Reports containing items of noncompliance and did not forward recommendations to NSDRC. Reports referenced are documented in paragraph 5."

## ITEM 1 - CORRECTIVE ACTIONS

At present an internal routing system to coordinate NRC IE Responses and reviews is not documented in procedure form at the Plant.

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To prevent recurrence of this infraction, an instruction will be prepared to establish a formal routing, review and approval system. The proposed completion date will be January 15, 1980. Until such time that the instruction is prepared and approved for use, all responses to Technical Specification violations will be submitted to PNSRC for review.

In addition, your inspector asked us to "address the apparent lack of coordination between the PNSRC and NSDRC when forming a licensee response to an item of noncompliance that is plant or system specific."

The American Electric Power Service Corporation's NSDRC Subcommittee on Plant Occurrences reviews all LER's that occur at Cook Plant. This review is conducted periodically. Corporate management review of responses to IE Notices of Violation is conducted through established procedure before written responses are transmitted to the NRC. Members of the NSDRC perform this review function. Effective November 14, 1979, all responses to items of noncompliance identified in IE Inspection Reports that are to be submitted to the Nuclear Regulatory Commission will be forwarded to the Plant for review prior to transmittal to the Nuclear Regulatory Commission.

#### ITEM 2 - INFRACTION

"Technical Specification 6.8.1 requires implementation of procedures, PMI-2275 "Fire Prevention - Control of Ignition Sources" requires authorization by the "I & M Construction Safety Coordinator" on a "Welding, Burning, or Grinding Permit."

Contrary to the above, on September 14, 1979, a large number of active welding permits either did not have this authorization, or contained signatures of personnel that were not the designated individual."

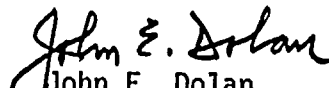
#### ITEM 2 - CORRECTIVE ACTIONS

A review of PMI-2275, Revision 3, revealed that the I&M Construction Safety Coordinator is identified in context by title only. One individual is assigned to perform the Safety Coordinator functions in addition to his normal job duties; however, an alternate was not identified to fulfill the required functions in his absence. To prevent

recurrence, four individuals were identified as I & M Construction Safety Coordinators with their names added to PMI-2275 via a Temporary Change Sheet on October 17, 1979, to alleviate any further problems of this type.

Very truly yours,

JED:em

  
John E. Dolan  
Vice President

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