

INDIANA & MICHIGAN ELECTRIC COMPANY

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

August 4, 1980
AEP:NRC:00447

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

SUBJECT: IE INSPECTION REPORT NOS. 50-315/80-08 and 50-316/80-07
ITEMS IN NONCOMPLIANCE

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter and its attachment are our response to Mr. Heishman's letter dated July 10, 1980 requesting responses to the three infractions listed in IE Inspection Report Nos. 50-315/80-08 and 50-316/80-07. We received Mr. Heishman's letter on July 15, 1980. One of these infractions (Item 1 of the "Notice of Violation") does not require a response since it is stated in the report that this item was satisfactorily resolved during the inspection.

Very truly yours,


R. S. Hunter
Vice President

Attachment

cc: R. C. Callen
C. Charnoff
John E. Dolan
R. W. Jurgensen
D. V. Shaller - Bridgman

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ATTACHMENT TO AEP:NRC:00447

RESPONSE TO INFRACTION NO. 1

The inspector considers this item closed with no reply necessary.

RESPONSE TO INFRACTION NO. 2

Although the events described in Item 2 of the "Notice of Violation" were recognized as being of sufficient importance for the on-duty Shift Operations Engineer to report them by telephone to the NRC Operations Center and to the Resident Inspector, the Unit Shift Supervisor and the Shift Operating Engineer failed to enter them in the applicable log-books.

As soon as the matter was brought to the attention of the Operations Superintendent by the Resident Inspector, "Late Entries" of these events were made in the required logbooks.

To prevent recurrence, the Shift Supervisor and the Unit Supervisor involved, were reminded of the requirement and importance of maintaining complete and accurate logs. In addition, a memo has been issued to all licensed operators restating the requirement and importance of maintaining accurate logs of all significant shift activities.

RESPONSE TO INFRACTION NO. 3

EXPLANATION

Surveillance testing of the auxiliary feedwater pumps is performed to satisfy the requirements of both Technical Specification Section 4.7.1.2 and the Inservice Inspection (ISI) Program as specified in Section XI of the ASME Boiler and Pressure Vessel Code.

On May 6, 1980, surveillance testing was performed on Unit 2's turbine driven auxiliary feedwater pump (TDAFP). The test results satisfied the requirements of Technical Specification 4.7.1.2; however, the pump discharge pressure was higher than the previous test results which placed the pump in the ISI test program "alert range" requiring an increase in the testing frequency.

Normally, the ISI Program required data are obtained from the Operations Department monthly surveillance test procedure which covers all auxiliary feedwater system surveillance requirements. This procedure, when completed, requires review and signoff by the Shift Operating Engineer (SOE).

On May 20, 1980, when the extra ISI program test was due, only pump flow, pump vibration and, pump suction and discharge pressures readings were required. These readings were recorded, using the applicable data sheet from the auxiliary feedwater system procedure. Since these data were required specifically for the ISI program and were to be forwarded to the plant performance section for review and evaluation, the SOE did not review the data obtained. The special test data did satisfy the ISI program acceptance criteria but, this time on the low side "alert range". The significance of the fact that the discharge pressure was below Technical Specification Section 4.7.1.2, minimum requirements was not recognized by the Operations Superintendent's office. Consequently, the pump was considered operable.

On May 27, 1980, the NRC Resident Inspector informed the plant Operations Superintendent of the TDAFP situation and that he considered the pump inoperable. Since the Action Statement Technical Specification Section 3.7.1.2 had been exceeded, Technical Specification Section 3.0.3 was in effect. Retesting of the pump was started immediately. Power reduction was also started to place the reactor in hot standby within one hour should this become necessary. The pump was successfully retested within the one hour and the power reduction terminated. Since the previous testing of this pump, there had been no work performed on it that would have affected the pump performance. The discrepancies with the discharge pressure readings have been attributed to failure to properly measure the turbine speed at the required test conditions. At no time during the period since May 6, 1980 was the TDAFP actually inoperable. The entire problem was a failure to properly conduct the test and evaluate the test results.

CORRECTIVE ACTION

The ISI test data sheet has been revised to assure that the Technical Specification discharge pressure requirement supersedes the operability requirements of the ASME Boiler and Pressure Vessel Code.

