

AMERICAN ELECTRIC POWER Service Corporation



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JOHN E. DOLAN
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AEP:NRC:00044

August 10, 1978


Donald C. Cook Nuclear Plant Units 1 & 2
Docket Nos. 50-315 & 50-316
License Nos. DPR-58 & 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 responds to Mr. Gaston Fiorelli's letter of June 28, 1978 which we received on June 30 and which transmitted to us a Notice of Violation generated as a result of IE Report No. 50-315/78-09; 50-316/78-07 by Mr. C. H. Brown. On July 20, Mr. Gaston Fiorelli of your staff agreed to a three week extension of our reply due date in a telephone conversation with Ms. J. F. Etzweiler of the American Electric Power Service Corporation. Our required reply to the Notice of Violation is attached.

Very truly yours,


John E. Dolan

JED:em

cc: R. C. Callen
G. Charnoff
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R. J. Vollen
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DONALD C. COOK NUCLEAR PLANT UNITS 1 & 2
DOCKET NOS. 50-315 AND 50-316
LICENSE NOS. DPR-58 AND DPR-74

ATTACHMENT TO AEP:NRC:00044

REPLY TO NOTICE OF VIOLATION TRANSMITTED WITH IE REPORT NO. 50-315/78-09;
50-316/78-07

INFRACTION 1 (UNITS 1 and 2) Contrary to Technical Specifications Section 6.8.1, procedure PMI 2271 was not followed in that untreated wood was used in the control rooms (the panel areas) and in other "safety related areas" of the plant.

CORRECTIVE ACTIONS The temporary Lexan security doors with wood frames on the panel backs have been removed. All other untreated wood objects have been removed from the panel areas.

Because the construction of Unit 2 is now complete, opportunities for situations similar to the cited non-compliance to recur are reduced and access by craft and plant personnel and the control of combustible materials in safety related areas is now completely under PMI 2271 entitled "Control of Combustible Materials." In addition, an order for treated lumber has been placed so that it will be available for scaffolding and other needs in construction and maintenance work.

Two additional steps shall be taken in order to increase the awareness, among craft and plant personnel at all levels, of the new materials control provisions of the fire protection program. The first step shall be the presentation and discussion of the requirements and the reasons for the requirements of PMI 2271 at I&M Construction, construction contractor, and Plant safety meetings. The statement to be presented will be approved by the Plant Manager and the I&M Construction Manager. The person responsible for each safety meeting will be required to sign and return the statement as an acknowledgment that the statement was presented to personnel. This action shall be taken by September 29, 1978.

The second step shall be the posting of metal signs at or in the safety-related areas listed in PMI 2271. The signs shall provide notice to the effect that the control of combustible materials is mandatory in the designated areas. The signs shall be installed by February 1, 1979.

INFRACTION 2 (Unit 2) Contrary to Technical Specifications Section 3.7.10, no fire watch had been posted at a nonfunctioning penetration fire barrier in the control room panel area.

CORRECTIVE ACTIONS The PNSRC had reviewed the requirements of Technical Specification 3.7.10 and agreed, with the Plant Manager's concurrence, that if the area protected by the non-functional penetration fire barrier is monitored by an automatic fire detection device which is operable, then the automatic detection device is considered as adequate surveillance and fulfills the requirement for establishing a continuous fire watch. This interpretation had not been previously documented, but was formally documented at PNSRC Meeting 555 on April 19, 1978. A copy of this interpretation was presented to the NRC inspector prior to his departure from the plant on April 20, 1978.

However, to provide a more conservative policy, it has been decided that, when a human continuous firewatch is not expected to be present on at least one side of the safety-related non-functional penetration fire barrier for more than one hour, then either a permanent or temporary penetration fire barrier seal shall be installed in the seal opening.

The requirements for non-combustible temporary seals shall be defined in a memo by August 31, 1978, and shall be included in the Plant Maintenance Department Procedure to be revised by November 1, 1978. The memo shall serve as a temporary procedure and shall be approved by the PNSRC, the Plant Manager and the Construction Manager. Both the memo and the Procedure revision are further described in the reply to Infraction 3.

INFRACTION 3 (Units 1 and 2) Contrary to Technical Specification 6.8.1.a, penetration fire barriers were being rebuilt using materials for which there was no approved procedure.

CORRECTIVE ACTIONS The penetration fire barrier repair method used was in accordance with the applicable specification written to cover such work, but no approved construction procedure existed at that time for the performance of such a repair by the site electrical contractor who did the work. Immediate remedial action was taken in the form of the writing of a temporary procedure dated April 24, 1978 and approved by the Construction Manager and the Plant Manager. The Plant Maintenance Department did and does have approved procedures for penetration fire barrier repairs, which Maintenance personnel follow when performing such work.

The specification referred to above is overly restrictive regarding repairs and is to be revised. Subsequent to that revision, the Plant Maintenance Department Procedure will be revised, by November 1, 1978, to include the full range of anticipated repair, replacement and installation work on penetration fire barrier seals. By the same date, this procedure will also be made applicable to I&M Construction and contractors. In the interim, until the Maintenance Department Procedure is revised, work by Construction and contractors will be performed in accordance with the specification referred to above as amplified and clarified by the April 24 temporary procedure and by the August memo which shall be approved by the PNSRC, the Plant Manager and the Construction Manager.

