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# INDIANA & MICHIGAN ELECTRIC COMPANY

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

June 26, 1981  
AEP:NRC:00576

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
Response to Violations Cited in IE Report  
Nos. 50-315/81-03; 50-316/81-03

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

Dear Mr. Keppler:

Enclosed herewith is our response to the violations cited in IE Inspection Report Nos. 50-315/81-03 and 50-316/81-03. A two week extension was granted for this submittal by Mr. Hayes of your office on June 11, 1981.

Very truly yours,

  
R. S. Hunter  
Vice President

cc: John E. Dolan - Columbus  
R. C. Callen  
G. Charnoff  
R. W. Jurgensen  
D. V. Shaller - Bridgman  
Region III Resident Inspector - Bridgman

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STATE OF NEW YORK )  
COUNTY OF NEW YORK)

R. S. Hunter, being duly sworn, deposes and says that he is the Vice President of Licensee Indiana & Michigan Electric Company, that he has read the foregoing response to the Notice of Violation contained in IE Inspection Report Nos. 50-315/81-03 and 50-316/81-03 and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

  
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Subscribed and sworn to before me this 29<sup>th</sup> day of June, 1981.

  
\_\_\_\_\_  
Notary Public

KATHLEEN BARRY  
NOTARY PUBLIC, State of New York  
No. 41-4606792  
Qualified in Queens County  
Certificate filed in New York County  
Commission expires March 30, 1983

THE UNITED STATES OF AMERICA

ALBANY, N. Y.

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Response to Item 1:

We have reviewed the three cases cited and have the following specific comments:

- 1(a) Design change No. RFC-DC-01-1819 was processed as an "Emergency" RFC after receiving a safety review by the Plant Nuclear Safety Review Committee (PNSRC). The RFC was classified as not safety-related. The proposed change was to insert sheet metal screws through the sheet metal covering on the door jambs for the ice-condenser inlet doors to hold insulation strips in place. The insulation strips had slipped down, interfering with the inlet door operation. The change was determined not to constitute an unreviewed safety question as per 10.CFR.50.59. The results of the review were documented on the PNSRC Review Checklist by a check mark in the "No" box. The bases for this determination were not documented.
- 1(b) Design change No. RFC-DC-12-1814 consists of relocating a 1" drain valve from a vertical section of pipe to a horizontal section of pipe in the drain line from each steam generator stop valve.

The Plant Maintenance Superintendent discussed the proposed change with the AEPSC Piping Section Cognizant Engineer and his verbal approval was received prior to PNSRC review. Following the PNSRC review the Plant Manager reviewed the proposed change with the AEPSC Chief Nuclear Engineer in a telephone conversation. The Chief Nuclear Engineer approved proceeding with the change installation.

Corrective Actions, Item 1(a) and 1(b) to Prevent Recurrence:

A PNSRC Subcommittee on Changes will be established. This Subcommittee will review all design changes (RFC's) prior to PNSRC review. For "Emergency" RFC's the Subcommittee will determine if the proposed change is not safety-related, is safety-related, or has a safety interface; or if it is in violation of any of the three essential requirements of 10 CFR 50.59. The basis for this determination will be documented on the PNSRC Review Checklist. If the "Emergency" RFC is classified as "Safety-related" or "Safety Interface" a written safety evaluation will be performed documenting the bases and criteria used to determine that the proposed change does not involve an unreviewed safety question. The Subcommittee's findings and the recommendations will be presented to the PNSRC for approval.



The PNSRC Review Checklist will be revised to accommodate the documentation of the required evaluations.

The procedure for processing "Emergency" RFC's (PMI-5040) will be revised by August 1, 1981.

- 1(c) All new proposed procedures have been reviewed by the PNSRC. Since the procedures were written to either implement a system or a procedure described in the FSAR or a design change which has had an independent safety evaluation, the PNSRC did not perform a detailed safety evaluation for these procedures. The PNSRC review was indicated by sign off on the procedure cover sheet.

All changes (revisions) to the plant procedures have always been evaluated by the PNSRC and the results of this review were documented on the 10 CFR 50.59 Review Checklist. Often this review has been documented by a check mark in a Yes or No box on the Review Checklist.

In the future, the PNSRC review of all procedures and revisions to procedures requiring a written safety evaluation will be documented on the PNSRC Review Checklist. The bases or criteria used to determine that the proposed procedure or change to the procedure does not constitute an unreviewed safety question will be documented in the safety review.

For temporary changes to procedures which are written in compliance with the requirements of Technical Specification 6.8.3, the PNSRC review and safety evaluation will be documented by signoff in the space provided on the Temporary Change Sheet form.

Date When Full Compliance Will Be Achieved

Full compliance on all of the above items will be achieved by August 1, 1981.

Response to Items 2 and 3:

Prior to July, 1980 the tickler file used to identify instructions and procedure review requirements had been maintained on a 3 x 5 card index file. The cards identified the last review date, last revision date, record of who performed the review and the next scheduled review date. In July, 1980 the Operations Department along with other departments moved to the new office building. The individual serving as the Quality Control Implementation Coordinator had also recently left the company. There was also a change in Operations Superintendent in October, 1980. In the transfer from one office



to another, office workers did not recognize the significance of the card file and it was discarded.

Since November, 1980 two employees have been assigned to the Quality Control Implementation Coordinating (QCIC) position to provide the coordination necessary to review procedures, submit required reports on time and to reinstitute an orderly review program as required by plant administrative controls.

Item 2: Failure to Submit Report within the Required Time

(1) Corrective action taken and results achieved:

Personnel involved in the submission of special reports have re-reviewed the requirements for report submission.

(2) Corrective action to be taken to avoid further noncompliance:

Special reporting requirements have been reinstituted with the re-establishment of a tickler system.

(3) The date when full compliance will be achieved:

We are currently in full compliance with special report requirements.

Item 3a. Improper Cancellation of Procedures

(1) Corrective action taken and the results achieved:

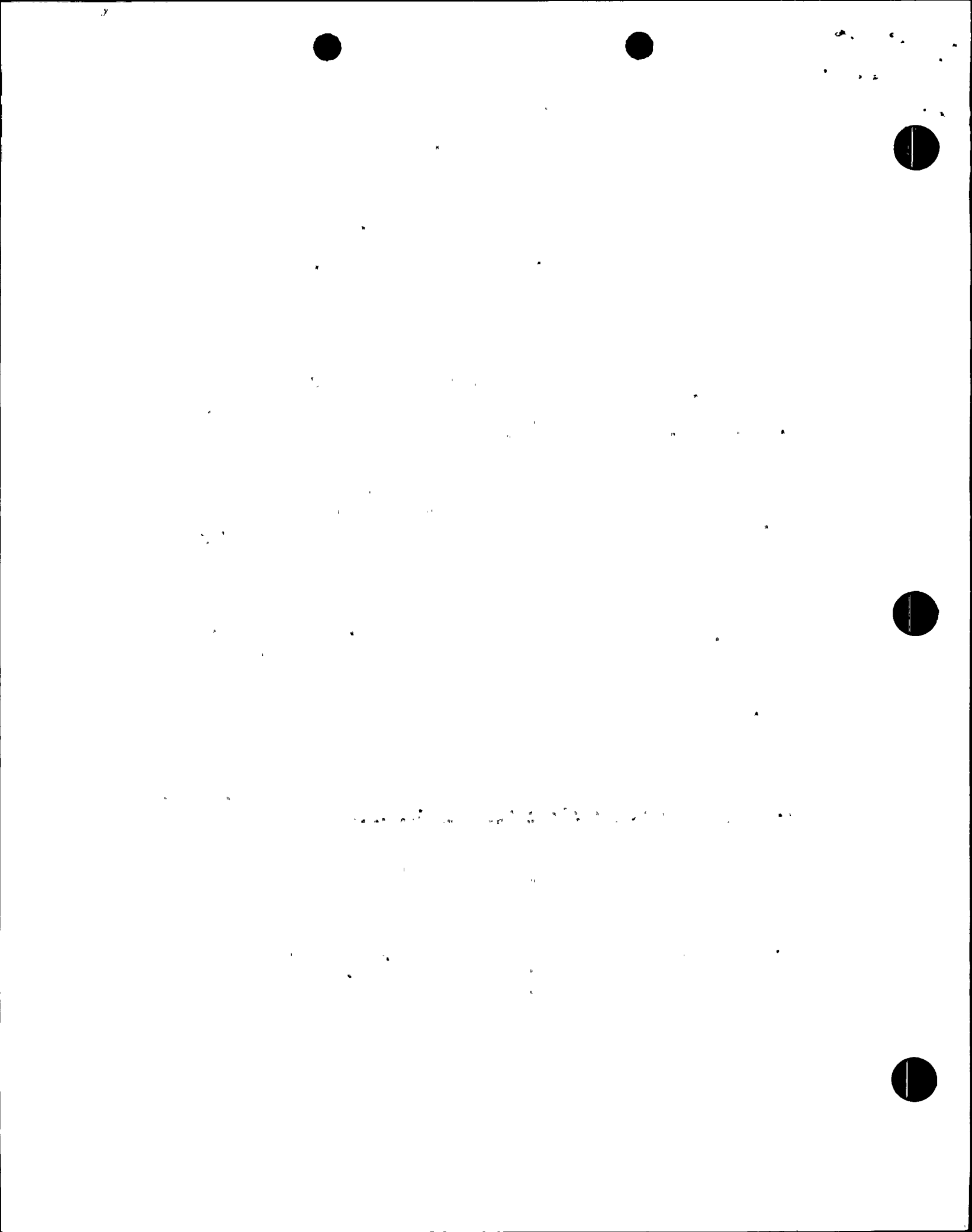
Since this inspection, all instructions and procedures that have been cancelled have had a summary statement explaining the reason for cancellation.

(2) Corrective action to be taken to avoid further noncompliance:

- QCIC, Performance Engineer, Production Supervisors and Operations Superintendent have re-reviewed the requirements for cancelling instructions or procedures.

(3) Date when full compliance will be achieved:

Full compliance has been achieved and is in effect as of the date of this letter.



Item 3b. Instructions and Procedures Review

(1) Corrective action taken and the result achieved:

The Operations Department Procedures are in five different series:

- 1) OHP 4021.XXX.XXX - Normal Operating Procedures
- 2) OHP 4022.XXX.XXX - Abnormal Operating Procedures
- 3) OHP 4023.XXX.XXX - Emergency Operating Procedures
- 4) OHP 4024.XXX.XXX - Annunciator Response Procedures
- 5) OHP 4030.STP.XXX - Surveillance Test Procedures

In the five series of procedures there are 614 procedures. Our review of the status of these procedures has identified 290 procedures that are behind in the review requirement. The OHP 4022.XXX.XXX and OHP 4023.XXX.XXX procedures are all current. They are reviewed routinely as part of the requalification training program. The record of this review was in the training Section at the time of this inspection, but was not presented to the NRC inspector for his review.

(2) Corrective Action to be taken to avoid further noncompliance:

To avoid reoccurrence, we have reinstituted a tickler control system to identify the review cycle and provide the records required by the plant administrative controls. All of the OHP 4024.XXX.XXX series (63 total) are currently being reviewed with completion expected by August 30, 1981. The remainder of the procedures past due for review are being rescheduled.

(3) Date when full compliance will be achieved:

We expect to have all past due procedures reviewed and then maintain the required review cycle by December 31, 1981.

Item 3c. Incomplete Distribution of Procedures

(1) Corrective Action taken and the results achieved:

- a) Procedures 2-OHP 4030.STP.030, rev. 2 and 1-OHP 4030.STP.015, rev. 2 were issued on February 3, 1981 and were forwarded to the Master Plant File on February 3, 1981.



b) Procedures 2-OHP 4021.008.003, rev. 1 dated February 22, 1980 and 1-OHP 4021.051.005, rev. 0 dated October 15, 1976. Our inspection of the Master Plant File found the original of both procedures in the file.

c) Procedure 1-OHP 4023.053.001, rev. 0 - A complete copy of this procedure was placed in the Unit 1 Control Room within an hour of the inspector finding the discrepancy.

(2) Corrective Action to be taken to avoid further noncompliance.

Office personnel have been instructed to be diligent in the distribution of instructions and procedures to ensure the required copies are properly distributed.

(3) Date when full compliance will be achieved:

We are currently in full compliance with plant administrative controls for distribution of instructions and procedures.

9-11-68

