

INDIANA & MICHIGAN ELECTRIC COMPANY

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

October 1, 1981
AEP:NRC:0605

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
IE Reports No. 50-315/81-14 and 50-316/81-18

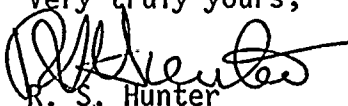
Mr. James G. Keppler, Regional Director
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region III
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter responds to Mr. C. E. Norelius's letter of July 15, 1981 transmitting to us the subject IE Reports. Originally your Mr. D. W. Hayes granted a two week extension to our Mr. Castresana by telephone. Our letter dated September 2, 1981 (AEP:NRC:605A) requested an additional one month extension to respond to the Appendix A notice of violation. In addition another one-week extension was granted by your Mr. D. W. Hayes on September 28, 1981.

Attachment 1 to this letter contains the reply to the two items of apparent non-compliance as cited in Appendix A to Mr. Norelius's letter. Attachment 2 provides the explanation of the unresolved item contained in the inspection report under Paragraph 7 concerning the review of the Unit 2 Cycle 3 Reload Safety Evaluation.

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
Joe Williams, Jr.
Resident Inspector at Cook Plant - Bridgman

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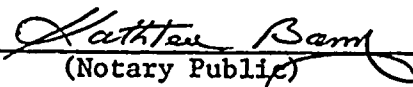
STATE OF NEW YORK
COUNTY OF NEW YORK

R. S. Hunter, being duly sworn, deposes and says that he is Vice President of Licensee Indiana & Michigan Electric Company, that he has read the foregoing response on the matter of Appendix A Notice of Violation attached to the NRC letter of July 15, 1981 which transmitted IE Inspection Report Nos. 50-315/81-14 and 50-316/81-18, and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.



R. S. Hunter

Subscribed and sworn to before me this 1st day of October, 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
FEDERAL
BUREAU OF
INVESTIGATION
OF THE
DEPARTMENT OF JUSTICE
WASHINGTON, D. C.

MEMORANDUM FOR THE DIRECTOR
FROM THE CHIEF OF BUREAU
SUBJECT: [Illegible]

1. [Illegible]

2. [Illegible]

ATTACHMENT 1 TO AEP:NRC:0605

RESPONSE TO ITEM 1

To prevent reoccurrence of the items constituting this violation, the Plant Manager has issued a memorandum to the Outage Coordinator requiring that the Plant Manager's Special Instructions (PMSI) on refueling outages be revised to include additional requirements to be imposed during the time that the reactor vessel head is off the reactor vessel. The new requirements will stipulate that a guard or other individual be stationed at the 650' containment area to account for items (tools, instruments, clipboards, etc.) going into and coming out of this containment area. This designated individual will also be responsible for checking persons going to this containment area to ensure that all items such as dosimeters, glasses, etc., are properly secured.

The PMSI will also require special caution in the placement of clothing and trash containers inside the containment during refuelings and in the use of headsets. In addition, plant personnel involved in future refueling shall be given special training to emphasize following plant procedures and requirements.

Furthermore, to assure a more complete response to this item, we requested Westinghouse, who was our refueling services contractor, to review the Inspection Report and provide us with proposed actions to prevent similar incidents in the future. Please note that our contractor is to comply with our procedures, a fact which was made clear to their lead personnel during an indoctrination talk held at the Plant prior to the start of the refueling activities. The actions which Westinghouse will take to prevent recurrence of Items a. through h. of Appendix A to the Notice of Violation are:

- a. Westinghouse shall instruct their shift supervisors on the operating deck in the containment to assist site supervisory personnel in ensuring that all personnel involved in refueling operations, regardless of employer, comply with the written refueling manual and site procedures.
- b. Westinghouse shall instruct their supervisors to tour and inspect the upper containment volume prior to completing each shift to ensure that loose objects are placed in proper storage locations and fastened as necessary. In addition, Westinghouse shall instruct their supervisors to identify to applicable site personnel those specific areas not complying with written procedures. Documentation of the shift inspection and actions taken shall be recorded in the Westinghouse shift work log.
- c. Westinghouse has informed us that all pens and pencils that conceivably could have been shipped to the site in support of refueling operations have been tested and

float in water. However, Westinghouse does supply its own employees with non-floating felt tip markers which will not be used in the future. A substitute marker that floats and is chloride free has been identified. Westinghouse will supply pens, pencils and markers that float for future refuelings at all locations.

d. See above under Items a. and b.

e. See above under Items a. and b.

f. g. and h. Westinghouse, through internal training programs instructs its personnel as to the importance of procedural compliance and the fastening of loose objects (glasses, tools, clothing, etc.) to prevent inadvertent loss into the refueling cavity. Written instructions have been issued by Westinghouse to responsible personnel to reemphasize those weak areas addressed in the NRC Inspection Report and to prevent future occurrence.

We will transmit to Westinghouse a copy of this response and request from them adherence to the proposed actions described in Paragraphs a. through h. above.

In addition, at the suggestion of Westinghouse, a proposed change to the refueling manual, stating that "Dosimetry equipment shall be securely fastened to personnel or personnel anti-contamination clothing to prevent inadvertent loss into the refueling cavity," will be implemented prior to the next refueling outage.

We believe that all the actions described above will provide an effective control of the conditions raised in the violation.

Full compliance shall be achieved prior to the next scheduled refueling outage.

RESPONSE TO ITEM 2

On June 30, 1981, the Operations Superintendent issued a memo to all Shift Operating Engineers requesting each supervisor and their staffs to review the Procedure No. PMP 2110.CPS.001 and its temporary (change) sheets. The memo is explicit with respect to the cited violation, and further, details the requirements and stresses that the rules are not dependent on the mode in which the Units are operating. On July 30, 1981, the acting Operations Superintendent confirmed to the Plant Manager, in writing, that the Shift Operating Engineers and their shifts were fully aware of the requirements of PMP 2110.CPS.001.

ATTACHMENT 2 TO AEP:NRC:0605

RESPONSE TO OPEN ITEM IN PARAGRAPH 7

The Westinghouse "Reload Safety Evaluation for Donald C. Cook Nuclear Plant Unit 2, Cycle 3" dated December 1980, did specify that a Technical Specification change was required for Cycle 3 and this fact was properly noted at the time. However, we believed that the change was unnecessary since we had been working with Westinghouse from before the Summer of 1980 to develop a new set of Technical Specifications for the control of core power distributions. These new Technical Specifications would have completely eliminated the need for the change identified in the reload evaluation. It was our intent to have these Technical Specifications in place for the start of Cycle 3 of Unit 2.

At the same time we were deeply involved in evaluating reload fuel suppliers for Unit 2. It was anticipated that the vendor who would be awarded the reload fuel contract would be responsible for supporting the submittal of this new set of Technical Specifications. As it turned out, Westinghouse was not awarded the contract, and as such their work on the Technical Specifications change ceased. The successful vendor was just starting its analysis in support of the change, an analysis which would not be available for several months.

The Westinghouse set of Technical Specifications was originally scheduled for discussion at the NSDRC meeting on March 17, 1981. However, aware that Westinghouse would not be awarded the fuel contract, the item was deleted from the meeting agenda since the likely vendor would not have the proposed change available for NRC submittal for some time.

Having worked for so long in developing the new Westinghouse set of Technical Specifications discussed above, we did not immediately recognize that abandoning the set course of action would result in having to request the change recommended in the reload evaluation report. However, as soon as that became apparent to us, the May 1, 1981 (AEP:NRC:0564) letter was written requesting the change.

We would like to note that our own internal review uncovered this oversight and that, upon discovery, immediate action was taken to properly modify the Unit 2 Technical Specifications. Furthermore, the NSDRC review was based on the information provided to its members during the meeting. Such information, albeit wrong on the issue of need for Technical Specifications changes, was right on the substantive issues pertaining to the safety analysis of Cycle 3 of Unit 2. In fact, during that particular NSDRC meeting, a meaningful discussion developed as to the values of certain cycle parameters, such as the initial critical boron concentration.

To prevent reoccurrence of this event the AEPSC Nuclear Engineering Division personnel in charge of reviewing reload cycle



safety evaluations have been instructed to be aware of the need to perform a careful review prior to presenting the matter at the NSDRC. In addition, the NSDRC presentation will be reviewed and approved by the supervisor of the engineer making the presentation prior to the actual presentation to the NSDRC.