

INDIANA & MICHIGAN ELECTRIC COMPANY

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

January 14, 1982
AEP:NRC:0640

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 INSPECTION REPORT NOS. 50-315/81-21; 50-316/81-24
APPENDIX A, NOTICE OF VIOLATION

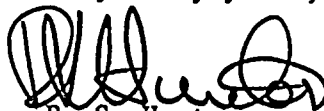
Mr. James G. Keppler, Regional Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region III
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter and its attachment respond to your letter of November 18, 1981 which had attached to it the subject Inspection Report. The attachment addresses the four violations noted in the Inspection Report and the corrective actions taken. With respect to your comment on the content of our responses, please be advised that we have developed revised procedures to improve our ability to respond as completely and as accurately as we can. We are taking steps to make sure that our answers are timely and, to the extent possible, will meet your original deadline. Where a response requires more time to fully address your concerns, we will request an extension of time from the NRC Staff so that our answers will still be timely.

On December 15, 1981 a request was granted by Mr. Knop of your office for an extension of two weeks to January 4, 1982 for this response. A further two week extension was granted to us by Mr. D. W. Hayes of your office on January 4, 1982.

Very truly yours,


R. S. Hunter
Vice President

RSH/emc
Attachment

cc: Attached

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PDR ADOCK 05000315
PDR

JAN 18 1982

[illegible]

Mr. J. G. Keppler

AEP:NRC:0640

cc: John E. Dolan - Columbus
R. W. Jurgensen
W. G. Smith - Bridgman
R. C. Callen
G. Charnoff
Joe Williams, Jr.
Region III Resident Inspector - Bridgman



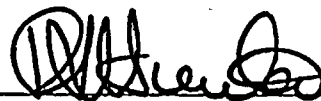
1. The first part of the document is a list of names and addresses. The names are listed in the first column, and the addresses are listed in the second column. The names are: John Doe, Jane Doe, and John Doe. The addresses are: 123 Main St, 456 Main St, and 789 Main St.



STATE OF NEW YORK)

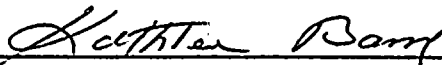
COUNTY OF NEW YORK)

R. S. Hunter, being duly sworn, deposes and says that he is a Vice President of the Licensee Indiana & Michigan Electric Company, that he has read the foregoing response to I.E. Inspection Report Nos. 50-315/81-21 and 50-316/81-24, dated November 18, 1981 and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.



Vice President

Sworn and subscribed to before me this
15th day of January, 1982



KATHLEEN BARRY
NOTARY PUBLIC, State of New York
No. 41-6066792
Qualified in Queens County
Certificate filed in New York County
Commission expires March 30, 1983

ATTACHMENT TO AEP:NRC:0640

RESPONSE TO THE NOTICE OF VIOLATION

RESPONSE TO ITEM 1: This item in the Inspection Report refers to the inspector's observation that demineralized water valves (DW-181 and DW-182) in the vicinity of the Spent Fuel Pit had not been padlocked nor had a check valve been installed at the outlet of DW-182 as had been stated in our letter No. AEP:NRC:0413, dated May 30, 1980. The corrective actions taken as stated in our reply were factual and implemented in a timely manner. However, with respect to valve DW-181 the failure was that adequate administrative controls had not been established to assure that the padlocks would always be reinstalled following use of the demineralized water connections. Regarding valve DW-182, this valve had not been included with the locked closed valves, neither had a check valve been installed due to the fact that the valve had not been considered to be "in the vicinity of the spent fuel pit". Valve DW-182 is located in the Hot Machine Shop on Elevation 650' in a separate room, not readily accessible and therefore we felt this error would not be repeated from this location.

To prevent reoccurrence, DCCNP Standing Order OSO.040 was revised on October 9, 1981 to lock close (padlock) and administratively control the demineralized water valves on the 650' elevation in the Auxiliary Building, including valves DW-181 and DW-182. Should it be necessary to open these valves, the Shift Operating Engineer shall be informed and the person requesting a particular valve shall enter it in the Non-conforming Equipment Log until the valve is locked closed. A check valve has been installed on the outlet of DW-182.

RESPONSE TO ITEM 2: This item addressed the lack of a procedure to use a fire hose for filling and making up water to the Refueling Transfer Canal from the Boric Acid Blender during the recent refueling outage. As the corrective action, Operations Department Procedure No. 12-OHP 4021.018.013 has been revised to include instructions that describe the process of filling the transfer canal from the Boric Acid Blender. Furthermore, procedural restrictions have been issued prohibiting the use of hoses to make up water to the spent fuel pit.

RESPONSE TO ITEM 3: The inspector determined, and we agree, that the Design Division review was not available and the required PNSRC review had not been done for design change RFC 12-2254 (Ice Deflectors) and that repair of the temporary roof attachments had not been fully completed as of September 3, 1981, even though the method of repair and approval had been received on site on September 17, 1979. Subsequent inspection on September 23, 1981 showed that the repairs were complete.

Our letter No. AEP:NRC:0224, dated July 11, 1979, responding to the Notice of Violation attached to IE Report Nos. 50-315/79-11 and 50-316/79-08, noted under Item No. 1 that the proposed change was judged to have had a negligible effect on a safety-related system. Our response also noted that the RFC should have been classified as safety-related so that it would have received a PNSRC review. Finally, our letter pointed out the request to the cognizant AEPSC Design Division to review the effect of the RFC on containment integrity and to recommend repair procedures, if appropriate. This review was documented on December 8, 1981 and made part of our files. The results of the review support our initial judgment that the drilling of anchor bolts into the containment wall had a negligible effect. Simultaneously with the review of this response, the PNSRC has reviewed RFC 12-2254. The conclusion of their review is that the modification had an insignificant effect and would not constitute an Unreviewed Safety Question. Furthermore, approximately two months prior to the date of AEP:NRC:0224, a member of the Field Civil Construction Department requested a member of the Design Division to review and approve on the letter of request, the use of self drilling anchors in the containment wall. This cognizant member of the Design Division signified his approval on the letter as requested. Additionally, on September 7, 1979, the same member from the Field Construction Department requested the Manager of the Structural Design Section to review the proposed method for repairing anchor bolt holes in the containment wall. The Manager of the Structural Design Section signified his approval of the repair method on the document which described it.

The Inspection Report also points out that not until the inspection performed on September 23, 1981, were the repairs of the temporary attachments completed. We can only attribute this time lag to the very large number of activities carried out at the Plant since the time of IE Inspection Reports 50-315/79-11 and 50-316/79-08 which were issued as you know, shortly after the TMI-2 accident. With respect to the time delay from an approved repair procedure to completion of repairs, please note that the schedule of completing RFC's considers manpower availability, complexity of the work, status of the Unit, as well as priority placed on the RFC. In this spirit, the epoxy coating of the brass plugs (the latter portion of the repair procedure installed in October of 1979) was not considered a high priority item.

RESPONSE TO ITEM 4: The inspector observed that a safety review was not conducted for a revision to design change No. RFC 12-2500. Further, AEPSC General Procedure No. 25 was not followed in that documentation was not transmitted to the site, prior to implementation of the design revision, showing that the required review and approvals had been conducted at the New York Offices.

RFC 12-2500 was initiated to modify certain control circuitry which was found to change position of the controlled device after reset of the initiating systems. The work and the subsequent testing was done in response to NRC IE Bulletin 80-06. The scope of the work was determined by the drawing review conducted in response to the IE Bulletin and the test conducted for this RFC verified the adequacy of the review. The work outlined under this phase of the RFC was detailed in the original RFC packet and reviewed by AEPSC Nuclear Safety and Licensing on March 6, 1980. The original packet was reviewed and accepted by the Plant Nuclear Safety Review Committee on March 17, 1981.

During the verification tests of the system level resets, it was discovered that the diesel generator load bank circuit breaker would reclose after a safety injection system level reset if the diesel generator were not connected to either of its associated safety buses. The load bank circuit breaker would not close if the diesel generator to bus circuit breakers were closed. Also, in case of a blackout while the diesel generator was being tested, the test breaker would open and remain open while the diesel bus breaker will close to serve the load. Overloading of the generator was not a concern since the load bank breaker could not close if the diesel was loaded. The unexpected closure of the circuit breaker on reset of the safety injection signal was deemed to be undesirable and the work necessary to revise the circuit to prevent this operational anomaly was initiated. Since the revision work due to system level resets was still in progress, the load bank circuit breaker control circuit revision was added to the related RFC. The work was identified as Supplement No. 2 to RFC 12-2500 on the design drawings and Revision 1 of RFC 12-2500 on waiver requests. The letter requesting authorization to perform the revision was written on April 30, 1981 and routed through the normal review path. Because this revision was closely related to the previously approved work, the approval was extended to this work. The change was reviewed and approved prior to its transmission to the Plant. The circuit change and its consequences were discussed with members of the Plant Staff. Plant personnel discovered the anomaly during the testing and were in continuous contact with members of the Electrical Generation Task Force in developing the solution.

No formal transmittal was used for the purpose and therefore no records kept of when the document was transmitted or whether it was transmitted.

The AEPSC Lead Engineer has been made aware of the importance of following AEPSC General Procedure No. 25 and the necessity of verifying that all communications regarding a proposed change must be documented and become part of the RFC packet.

کتابخانه
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