

# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

February 19, 1985

AEP:NRC:0920

Donald C. Cook Nuclear Plant  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
INSPECTION REPORT 50-315/84-21 (DRSS)  
50-316/84-23 (DRSS) -- RESPONSE TO NOTICE  
OF VIOLATION

Mr. James G. Keppler  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Keppler:

This letter responds to Mr. J. A. Hind's letter dated January 8, 1985, which forwarded the subject Inspection Report of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant on November 26, 1984 through November 30, 1984. Based on a discussion with Mr. M. Schumacher of your staff, an extension to February 19, 1985 was granted for this response. The Notice of Violation attached to Mr. Hind's letter identified two items as violations of Technical Specification requirements and one item as a violation of 10 CFR 20. The following are our responses to these items:

## ITEM 1

Unit 1 and Unit 2 Technical Specification 6.9.1.7 states that the annual radiological environmental operating reports shall include the results of the land use census required by Specification 3.12.2, and summarized and tabulated results of all radiological environmental samples taken during the report period.

Contrary to the above, the Annual Radiological Environmental Operating Report for 1983 did not include the results for: (1) the 1983 land census; (2) the gamma isotopic analyses of monthly composite water samples from L1, L2, and L3 locations, and (3) gross beta and gamma isotopic analyses of each monthly composite sample from St. Joseph, Lake Township, and New Buffalo intakes:

## RESPONSE TO ITEM 1

### 1. Corrective Action Taken and Results Achieved

Results for (1) the 1983 land census; (2) the gamma isotopic analyses of 1983 monthly composite water samples from L1, L2, and L3 locations and

8502280006 850219  
PDR ADDCK 05000315  
Q PDR

1506

FEB 21 1985



(3) gross beta and gamma isotopic analyses of each 1983 monthly composite sample from St. Joseph, Lake Township, and New Buffalo intakes will be included in the 1984 Annual Radiological Environmental Operating Report.

2. Corrective Action to be Taken to Avoid Further Noncompliance

An AEPSC procedure has been developed that provides guidance on preparation of the Annual Radiological Environmental Operating Report to assure that all required data is included.

Also, a Plant Radiation Protection procedure is being developed which will provide guidance on preparation of the Annual Radiological Environmental Operating Report to assure that all required data is included. The procedure is currently scheduled to be issued by May 1, 1985.

3. Date When Full Compliance Will be Achieved

Full compliance will be achieved by May 1, 1985 when the missing 1983 data is included as part of the 1984 Annual Radiological Environmental Operating Report.

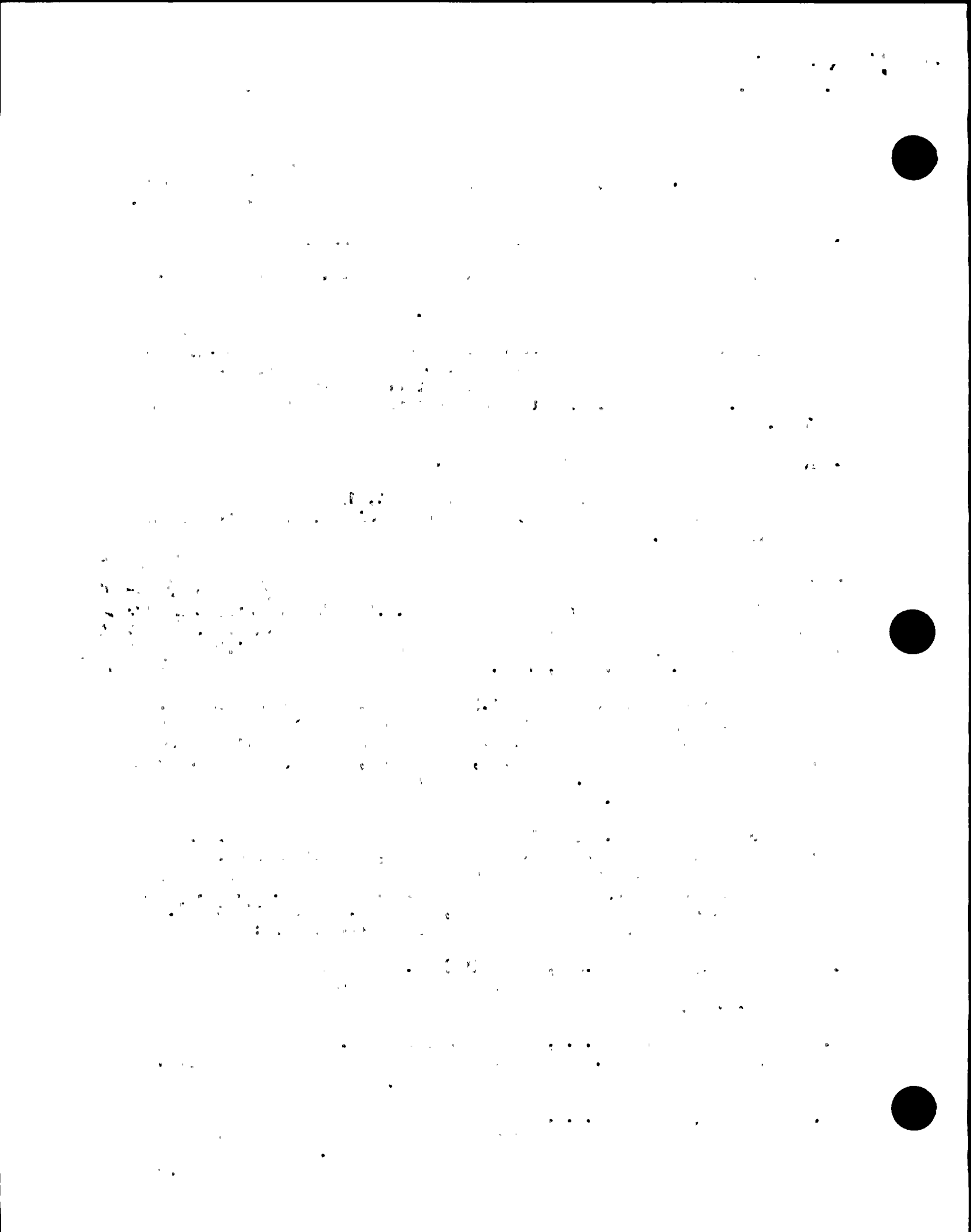
ITEM 2

Unit 1 and Unit 2 Technical Specification 6.8.1 states that written procedures shall be established, implemented and maintained covering, among other things, the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.

Appendix "A" of Regulatory Guide 1.33, November, 1972 states in part: "Procedures of a type appropriate to the circumstances should be provided to assure that tools, gauges, instruments, controls, and other measuring and testing devices are properly controlled, calibrated, and adjusted at specific periods to maintain accuracy." Laboratory equipment is listed as a specific example of such equipment.

Contrary to the above: (a) the licensee has not prepared and implemented a procedure governing the use, control, calibration, or adjustment of a PC-55 internal gas flow proportional counter currently in use on a daily basis; (b) the licensee has not fully implemented procedure 12 THP 6020.LAB.088, "Quality Control of Counting Equipment" (Revision 6, Change 5, October 23, 1984). Specific Examples of a failure to implement this procedure are:

- i. Contrary to step 6.2.6, the Ge(Li) No. 2 detector was not taken out of service when a source count fell outside a  $3\sigma$  control band on November 15, 1984;
- ii. Contrary to step 6.2.7, no entries were recorded on the control chart for the Ge(Li) No. 2 detector between October 6 and October 9, 1984, a period in which the detector was in use;
- iii. Contrary to step 6.2.7, no entries were recorded on the control chart for proportional counter PC-5 between November 21 and November 25, 1984, a period in which the counter was in use.



RESPONSE TO ITEM 2

It is noted that the violation states, "(Revision 6, Change 5, October 23, 1984)." It is not Change 5 but Change 3 that was approved October 23, 1984. Change 5 was approved January 5, 1985. Nevertheless, we agree the substance of the violation is correct, and our detailed response is presented below.

1. Corrective Action Taken and Results Achieved

a) When the violation was identified and brought to our attention, the PC-55 internal gas flow proportional counter was removed from service.

b) i. On November 16, 1984, the source check count fell within the 3σ control band without any changes being performed on the instrument.

Removing the instrument from service when the source check rate falls outside the 3σ control band is clearly required by Step 6.2.6. The technician who failed to follow the procedure has been counseled on his responsibility to follow procedure requirements.

ii. A data review indicated that although the control chart (graph) entry was not made, the source count was performed and found to be acceptable for continued instrument use.

The technician who failed to make the proper entry on the graph was counseled on his responsibility to follow procedure requirements.

iii. A data review indicated that although the control chart (graph) entry was not made, the source count was performed and found to be acceptable for continued instrument use.

The technician who failed to make the proper entry on the graph was counseled on his responsibility to follow procedure requirements.

2. Corrective Action to be Taken to Avoid Further Noncompliance

a) A Chemical Section procedure is being written for use, control, calibration, or adjustment of the PC-55 internal gas flow proportional counter. The target date for procedure issuance is February 26, 1985.

b) The technicians involved in the failure to follow procedures have been reminded of their responsibility to follow procedures. In addition, a Chemical Supervisor has been assigned the responsibility to review and approve the counting room quality control check to insure all required tests are performed and logged per the procedure requirements.

c) Procedure compliance has and will continue to receive plant management attention.

...  
...  
...  
...

...  
...  
...

...  
...  
...

...  
...  
...  
...

...  
...  
...  
...  
...

...  
...  
...  
...

...  
...  
...

...  
...  
...  
...

...  
...  
...  
...  
...

...  
...  
...

### 3. Date When Full Compliance Will be Achieved

- a) Full compliance was achieved on November 30, 1984 when the PC-55 was removed from service.
- b)
  - 1. Full compliance was achieved on November 16, 1984 when the Ge(Li) 2 daily source check was within the 3 $\sigma$  control band.
  - ii. Full compliance was achieved on October 10, 1984 when the requirement to log the Ge(Li) 2 daily source check on the control chart (graph) was completed.
  - iii. Full compliance was achieved on November 26, 1984 when the daily source check of the PC-5 was logged on the control chart (graph).

### ITEM 3

10 CFR 20.201(b) requires that the licensee make such surveys as may be necessary to comply with 10 CFR 20 and reasonable to evaluate radiation hazards. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above requirement, as of the dates of the inspection, November 26-30, 1984, the licensee failed to make such surveys as were necessary to assure compliance with 10 CFR 20.106, "Radioactivity in Effluents to Unrestricted Areas." These surveys were inadequate in that the analytical technique used inaccurately determined the concentration of radioiodines released to the environment. Specifically, since November 16, 1984 silver zeolite cartridges from SPING effluent monitors were analyzed incorrectly oriented toward the detector, thus producing a significant nonconservative error in the derived air concentration for radioiodines released into the environment.

### RESPONSE TO ITEM 3

The Unit Vent, Auxiliary Ventilation System iodine sampler has associated with it a monitor. It is of note that this monitor does not depend on the orientation of the iodine sample media. This monitor's high alarm setpoint is set such that if the limits of 10 CFR 20 were exceeded, an alarm would occur. This in essence, provides a continuous survey of radioiodines in effluents to unrestricted areas to insure compliance with 10 CFR 20 limits.

#### 1. Corrective Action Taken and Results Achieved

The iodine sampling media is routinely counted on laboratory instrumentation. The results are used to quantify the iodine releases in order to perform the surveillances required by Technical Specifications 4.11.2.1.b and 4.11.2.3, and to insure compliance with the limiting conditions for operation of 3.11.2.1.b and 3.11.2.3.

The analysis was being performed with the sampling media inlet side facing away from the laboratory instrumentation detector when the calibration

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111

1111 1111 1111 1111 1111 1111 1111 1111 1111 1111



geometry was with the inlet facing toward the detector. Prior to the next required iodine sampling media analysis, the personnel involved in the analysis were instructed as to the required orientation of the Iodine Sampling Media. Proper geometry iodine sample media analyses have been performed on samples collected since December 12, 1984.

2. Corrective Action to be Taken to Avoid Further Noncompliance

Written guidance was provided to all Chemistry Section personnel on January 4, 1985. Procedures have been changed which clearly indicated the calibration geometry required and the sample media analysis geometry required.

3. Date When Full Compliance Will be Achieved

Full compliance was achieved on December 12, 1984 when proper iodine sample media counting geometry analysis was performed on samples collected since that date.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,



M. P. Alexich  
Vice President

*Worm*  
*2-19-85*

th

Attachment

cc: John E. Dolan  
W. G. Smith, Jr. - Bridgman  
R. C. Callen  
G. Bruchmann  
G. Charnoff  
NRC Resident Inspector - Bridgman

