

# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
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March 28, 1985

AEP:NRC:0932

Donald C. Cook Nuclear Plant  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
INSPECTION REPORT 50-315/84-23 (DRP); 50-316/84-25 (DRP)  
RESPONSE TO NOTICE OF VIOLATION

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

Dear Mr. Keppler:

This letter responds to Mr. W. D. Shafer's letter dated February 27, 1985, which forwarded the subject Inspection Report of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant on December 22, 1984 through February 11, 1985. The Notice of Violation attached to Mr. Shafer's letter identified one item as a violation of Technical Specification requirements:

"Technical Specification 3.3.3.10.b requires, with less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-13.

Contrary to the above, with the Unit 1 auxiliary building vent radiation monitor inoperable on November 12, 1984 the applicable ACTION 28 of Table 3.3-13 (Item 3.a) was not complied with, in that required grab samples were not taken and analyzed within eight hours, but were completed after eight hours and 36 minutes.

Also contrary to the above, with the Unit 1 and Unit 2 hydrogen monitor inoperable on November 29, 1984, the applicable ACTION 30 of Table 3.3-13 (Item 1.a) was not complied with, in that required grab samples were not taken and analyzed within 12 hours, but were completed after 12 hours and eight minutes.

Each event was repetitive of a previous occurrence, the first example duplicating an event of November 8, 1984 and the second duplicating an event of May 4, 1984. The second example applies to both Units."

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The following is our response:

The first part of this item concerns missed samples on the Unit 1 Vent Stack Monitor. On November 8, 1984 a sample was missed due to inadequate communications between the Control Room Unit Supervisor, Radiation Protection and the Chemical Section. The inadequate communications were due to uncertainty as to who was responsible for inoperable equipment. On November 12, 1984 a sample was missed due to personnel error. The responsible technician failed to collect the sample within the specified eight hours. The sample was completed in eight hours and 36 minutes.

The second part of this item concerns missed samples on the Auto Gas Analyzer. On May 4, 1984 a sample was missed due to a clearance permit tag not being hung within the anticipated time frame. Hanging the clearance tag would remove the waste gas compressor from service, effectively eliminating the need to take the compensatory sample. In addition, work was being done on a regulator which was required to provide adequate sample pressure. Therefore, the Gas Decay Tank, which was in service, could not be sampled. On November 29, 1984 sampling was started in a time frame which is normally sufficient to complete the sampling requirements. However, the sampling was delayed because of the unexpected inoperability of a sample device (i.e., Flexielect). The Flexielect was returned to service and the sample was completed in 12 hours and 8 minutes, rather than the specified 12 hours.

1. Corrective Actions Taken and Results Achieved:

Plant Standing Order No. OSO.049, "Sample Requests", was amended on December 7, 1984 to assure that person(s) responsible for inoperable equipment are properly identified. The Operations personnel have been reminded to notify the Chemical Lab whenever Technical Specification compensatory sampling must be initiated. There have been several Radiation Monitoring System (RMS) instrument calibrations since the November 8, 1984 incident with no missed samples due to inadequate communications during calibration of inoperable instruments.

For the missed sample due to personnel error, the technician involved along with other technicians in the section have been reminded of the importance of taking Technical Specification related samples in the required time frame.

2. Corrective Actions Taken to Prevent Recurrences:

A Chemical Section supervisory letter (No. 247) was issued delineating steps to insure compliance with the frequencies specified in Technical Specification sampling requirements. These steps have reduced the risk of missing Technical Specification required samples due to unforeseen problems.



Mr. James G. Keppler

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Responsibility has been clearly stated within OSO.049 which should assure the personnel responsible to take compensatory actions are notified in sufficient time to complete the required action.

3. Date When in Full Compliance:

Compliance was achieved on November 29, 1984 when the last of the cited samples was taken. Plant Standing Order No. OSO.049 was amended on December 7, 1984.

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  
RBK  
3/28/85

edg

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