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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

August 28, 1985
AEP:NRC:0945

Donald C. Cook Nuclear Plant Unit No. 1
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC Report Nos. 50-315/85016(DRP) and 50-316/85016(DRP)


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

Dear Mr. Keppler:

This letter is in response to Mr. N. J. Chrissotimos' letter dated July 29, 1985, which forwarded the subject inspection report of the special safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant during the period May 21, 1985 through June 24, 1985. The Notice of Violation attached to Mr. Chrissotimos' letter identified one violation. The response to this violation is addressed in the attachment to this letter.

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 8/27/85*

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Attachments

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

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NRC ITEM

"10 CFR 50, Appendix B Criterion III 'Design Control' requires design changes, including field changes, be subject to design control measures commensurate with those applied to the original design. This requirement is implemented, in part, at Paragraph 10.4.3 of licensee procedure PMI-5040 'Design Change Control Program,' which states that if a design change cannot be installed within the tolerance provided, work must stop pending specified reviews and approvals.

"Contrary to the above, during the performance of a design change under RFC 01-2764 the licensee implemented field changes without the required reviews and approvals when tie-rods were placed differently from that shown on the only applicable drawing; further, when the tolerance of drawing 12-3434A-4 for one-half inch grout between baseplate and floor could not be met, work was not stopped, nor were the specified reviews and approvals performed.

"This is a Level IV violation (Supplement 1)."

RESPONSE

Corrective Actions Taken and Results Achieved

The battery tie rod placement was corrected immediately in accordance with the approved drawing. The deviation from the grout tolerance was approved by the AEPSC design group, and no changes were required.

Walkdowns performed by AEPSC, Plant and Vendor representatives identified additional problems that confirmed that the batteries had not been installed to the supplied vendor drawings. The problems found were corrected and a final walkdown was performed; no additional problems were identified.

Corrective Action To Be Taken To Avoid Further Violation

To prevent recurrence of the problems identified, the following actions are being taken:

1. Additional training will be given to appropriate personnel to ensure that future design changes are installed in accordance with approved design drawings. This training will be completed by December 1, 1985.
2. The present method of scoping design changes will be revised to identify those instances in which existing installation procedures may not adequately direct the work to be performed, and to assure that adequate guidance and QC involvement is provided. This will be accomplished through revisions to existing installation procedures, generation of unique procedures, or supplements to the drawings as appropriate for each specific design change. In addition, punch lists are being developed to assure that items such as QA and QC reports, Plant

Deviation Reports and other constraints are monitored and reviewed prior to declaring a modified system operable. These revisions will be completed by December 1, 1985.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on July 27, 1985 when all identified problems were corrected. It was also determined by June 21, 1985 that the as built condition of the battery rack installation was seismically adequate and no change to the grouting was necessary.

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