

DMB

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
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April 24, 1986
AEP:NRC:0986

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC INSPECTION REPORT NOS. 50-315/86004(DRS)
AND 50-316/86004(DRS)

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. W. G. Guldemon's letter dated March 25, 1986, which forwarded the routine safety inspection conducted by members of your staff. This inspection was conducted from January 21, 1986 through February 18, 1986 on activities at the D. C. Cook Nuclear Plant Units 1 and 2. The notice of violation attached to Mr. Guldemon's letter identified two violations. Per your letter, no reply is required for violation no. 1. The response to violation no. 2 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
M. P. Alexich BRS
Vice President 4/24/86

Attachment
MPA/rjn

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

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NRC Violation No. 2

"Unit 2 Technical Specification 3.3.3.10b requires, with less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-13. The ACTION shown in Table 3.3-13 for no OPERABLE Unit auxiliary building ventilation system noble gas activity monitor is ACTION 28, which permits continued effluent releases provided grab samples are taken at least once per eight hours.

Contrary to the above, on December 27, 1985 with no OPERABLE Unit 2 auxiliary building ventilation noble gas activity monitor, ACTION 28 was not complied with in that consecutive samples were taken after an interval of 10 hours and 22 minutes rather than at least once per eight hours.

This event appears repetitive of previous occurrences on June 3, 1985 and, on Unit 1, on November 8 and 12, 1984."

Response To NRC Violation No. 2Corrective Action Taken and Results Achieved

The following corrective actions were taken upon discovery of the missed samples:

- a) Upon discovery of the December 27, 1985 extended sampling interval the samples were immediately obtained. No abnormal activity levels were indicated and no operational activities occurred which could have been expected to cause elevated activity levels.

A review of the Technical Specification requirements for sampling and the importance of performing these in the time frame defined was conducted with the technicians involved in the June 3, 1985, and December 27, 1985, events. Disciplinary action was taken with these individuals.

- b) During the November 8 and 12, 1984 occurrences, it was determined that the missed surveillances were the result of a communication failure between the departments involved. Appropriate personnel were reinstructed on the importance of this work at the time of the incidents.

Corrective Action To Be Taken To Avoid Further Violation

To preclude this type of event from recurring, the following actions were taken upon Plant Management's instruction:

1. A program has been established to keep cognizant personnel aware of inoperable Technical Specification required equipment. Equipment that falls into this category is reviewed after the Plant's morning "Plan of the Day" meeting. During this review a status report is given by the

appropriate Department Heads to the Assistant Plant Manager of Maintenance on what actions are underway to ensure the expeditious return of this equipment to operable status, and the compensatory actions being taken until the equipment is returned to operable status.

2. An independent audit was performed beginning March 10 through March 21, 1986 by Corporate QA on the programmatic controls in place for handling event initiated Technical Specification surveillances. As a result of this audit, the following interim and long term measures have been or are being taken:
 - a. A memo was sent to all departments on April 21, 1986 providing guidance for using the event initiated attachments of PMI-4030.
 - b. The event initiated portion of PMI-4030 is currently under revision. This revision will become PMI-4031, and will be strictly used for event initiated surveillances. Changes include:
 1. Delineation of department responsibilities.
 2. Reduction in the number and intricacy of forms associated with reporting and tracking.
 3. Development of a flow chart to aid in utilizing the paperwork to insure compliance.
 - c. Upon completion of PMI-4031 and PMI-4030, training will be provided to all departments on these procedures.
 - d. Procedure 12 THP 6020.LAB 100 was revised on April 17, 1986 to clearly indicate its interface with PMI-4030.
3. The acting plant manager has given direction to appropriate plant management on the importance of properly implementing action initiated surveillances.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on December 27, 1985, at 0718 hours when the required grab sample was obtained. PMI-4030 will be revised, and the new procedure, PMI-4031, will be completed by July 1, 1986. These procedures will be effective August 15, 1986, after training of all appropriate personnel is complete. In the interim, the memo sent out to all departments on April 21, 1986 reemphasizes the requirements of PMI-4030.

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