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SUBJECT: Responds to NRC 870520 ltr re violations noted in Insp Repts  
 50-315/87-09 & 50-316/87-09. Corrective actions: operations  
 memo issued on 870415 requiring control of evolutions such  
 as cooldown/depressurization by operator assigned to task.

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# INDIANA & MICHIGAN ELECTRIC COMPANY

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June 19, 1987  
AEP:NRC:1029

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. 50-315/87009 (DRP)  
AND 50-316/87009 (DRP)

U.S. Nuclear Regulatory Commission  
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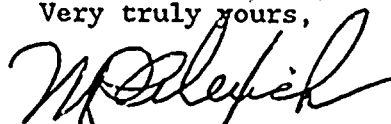
Attn: A. B. Davis

Dear Mr. Davis:

This letter is in response to W. G. Guldemon's letter dated May 20, 1987, which forwarded the report on the routine safety inspection conducted by members of his staff. This inspection was conducted from April 1, 1987 through May 4, 1987 on activities at the D. C. Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Guldemon's letter identified one violation, which 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

cm

Attachment

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

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ATTACHMENT TO AEP:NRC:1029

RESPONSE TO NRC INSPECTION REPORT 315/87009; 316/87009

Inspection Report 315/87009; 316/87009

NRC Violation

"Unit 1 Technical Specification 3.4.9.1 requires the Reactor Coolant System (RCS) temperature and pressure [to] be limited during cooldown within the limit lines of Figure 3.4-3. A required ACTION with any of the limits exceeded is to restore temperature and/or pressure within the limit within 30 minutes.

"Contrary to the above, between 7:15 p.m. and 8:03 p.m. EDT on April 8, 1987, a period greater than 30 minutes, RCS temperature and pressure were outside the limits of Figure 3.4-3 during a plant cooldown, and ACTION was not taken to restore conditions within limits."

Response to Violation

(1) Admission or Denial of the Alleged Violation

Indiana & Michigan Electric Company admits to the violation.

(2) Reasons for the Violation

This violation was the result of personnel error on the part of the operating crew.

During all cooldown and heatup evolutions, the Reactor Coolant System pressure and temperature parameters are to be logged and plotted against the Technical Specification temperature/pressure limit curve every fifteen minutes. This function was assigned to a non-licensed member of the Control Room crew. The actual cooldown was under the control of a licensed reactor operator. As a backup to the manual plotting of pressure and temperature, the heatup and cooldown curve was displayed on a Plant Safety System Display (PSSD) terminal which was in full view of the Control Room personnel. This display was subsequently determined to be nonconservative with respect to the Technical Specification parameters.

At approximately 1910 hours on April 8, 1987, the individual taking data also began taking required shiftly surveillance readings. Due to this additional work load and the fact that the cooldown trend was good, he stopped plotting the parameters against the pressure/temperature curve, however he continued to log these parameters at 15 minute intervals. At 2000 hours on April 8, 1987, he resumed plotting these parameters starting with the first one not plotted at 1915 hours. At this time he realized that the pressure and temperature readings had exceeded the Technical Specification limits and immediately notified the Unit Supervisor. The largest disparity between actual conditions and the Technical Specification limits was at 306°F and 1160 psig compared to the Technical Specification limit of 306°F and 980 psig.

1

2



The RCS pressure and temperature conditions, noted below, were outside the acceptable region of the Technical Specification Cooldown Curve (Figure 3.4-3) which is valid for up to 12 effective full-power years (EFPYs) of operation.

<u>TIME</u>	<u>PRESSURE (PSI)</u>	<u>TEMPERATURE °F</u>
1915	1110	320.6
1930	1120	316.3
1945	1150	311.0
2000	1160	306.0

An evaluation to determine Reactor Coolant System integrity for continued operation has been performed. A new cooldown curve which reflects the actual conditions existing at the time of occurrence was developed by Southwest Research Institute at our request. The basis of the curve was established using Regulatory Guide 1.99 Rev. 1, a cooldown rate of 20°F/hr and eight EFPYs of reactor operation.

Review of the curve shows that the pressure and temperatures referenced above were well within the acceptable operating range for the reactor vessel, and therefore the structural integrity of the reactor vessel was not jeopardized.

Based upon the evaluation, we believe that this event did not constitute an unreviewed safety question as defined by 10 CFR 50.59 and did not pose a threat to public health and safety.

### (3) Corrective Actions Taken and Results Achieved

The pressure and temperature parameters were immediately returned to within the Technical Specification limits on April 8, 1987.

### (4) Corrective Actions To Be Taken To Avoid Further Violations

- a. An operations memorandum was issued on April 15, 1987 which requires that evolutions such as cooldown/depressurization are to be controlled by one operator who is specifically assigned to that task alone.
- b. The PSSD computer display was corrected on April 16, 1987 to reflect the proper temperature and pressure limits of Technical Specification 3.4.9.1. This was accomplished for both units.
- c. The graphs of both the heatup and cooldown curves have been redrawn to make them easier to use and more distinct with respect to the required Technical Specification limits.
- d. An administrative requirement is under development that will require the conduct of a standard briefing regarding mode of operation and concerns associated with evolutions involving pressure/temperature limits during heatup and cooldown.

(5) Date When Full Compliance Will Be Achieved

Full compliance with the Technical Specification pressure and temperature limits was achieved on April 8, 1987. The operations memorandum requiring that one dedicated operator be assigned to evolutions such as cooldown/depressurization was issued on April 15, 1987. The PSSD computer display was corrected to reflect the current Technical Specification pressure and temperature limits on April 16, 1987. The administrative requirement for conducting a standard briefing on mode of operation and concerns associated with evolutions involving pressure/temperature limits during heatup and cooldown will be fully implemented by June 26, 1987.



