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 ALEXICH, M. P. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DAVIS, A. B. Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 870629 ltr re violations noted in Insp Rept
 50-315/87-11. Corrective actions: weld rod transfer case
 removed & weld rods disposed of in accordance w/
 appropriate procedure.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
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July 29, 1987
AEP:NRC:1032

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
RESPONSE TO NRC INSPECTION REPORT NOS. 50-315/87011 (DRP)
AND 50-316/87011 (DRP)

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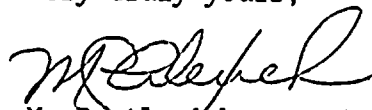
Attn: A. B. Davis

Dear Mr. Davis:

This letter is in response to Mr. W. G. Guldemon's letter dated June 29, 1987, which forwarded the subject report of the routine safety inspection conducted by members of his staff. This inspection was conducted from May 5, 1987 through June 15, 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
NRC Resident Inspector - Bridgman
T. E. Murley

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Q PDR

TEO/
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Attachment to AEP:NRC:1032

Response to Inspection Report 50-315/87011; 50-316/87011



Response to Inspection Report 50-315/87011; 50-316/87011

NRC Violation

"Units 1 and 2 Technical Specifications 6.8.1 require implementation of the applicable procedures identified in Appendix A to Regulatory Guide 1.33 dated November, 1972. This includes in Section I procedures for performing maintenance. 12 MHP 5050 SPC.001 is one of these procedures and provides specific instructions in Paragraph 3.8 that require disposal or return of weld rod at the end of each shift.

"Contrary to the above, four weld rods issued on May 13, 1987, had not been properly disposed of as of May 27, 1987, but remained stored in the auxiliary building."

Response to Violation(1) Admission or Denial of the Alleged Violation

Indiana & Michigan Electric Company admits to the violation.

(2) Reasons for the Violation

The violation was the result of the failure of plant personnel to follow proper practice in assuring control of certified welding materials.

The weld rods in question were being used for a Job Order (No. 702661) to repair the security gate (No. 856) that protects the airlock entrance into containment. Through discussions with the foreman responsible for this work, it was found that as part of the cleanup after completion of the work, the welder removed the weld rods from the heated rod caddy and placed them in the transfer case prior to taking them to a stub disposal barrel to be destroyed as required by weld rod control procedures. The welder then placed the transfer case on the framework above the security gate. The transfer case was not readily visible in this location. The welder then proceeded to remove the welding machine, tools, debris, etc. from the area but failed to notice or remember the transfer case containing the weld rods. During the post-work inspection conducted prior to signing of the Job Order, the responsible foreman also failed to notice the transfer case.

The transfer case was subsequently found by the NRC Resident Inspector during a routine inspection. This finding was brought to the attention of plant management in the inspection exit meeting conducted on May 26, 1987. It was determined that the weld rods were not subject to proper control for a period of approximately thirteen days.

(3) Corrective Actions Taken and Results Achieved

Upon discovery of the uncontrolled welding materials by the NRC Resident Inspector, the weld rod transfer case was removed, and the weld rods were disposed of in accordance with appropriate procedure.

(4) Corrective Actions Taken to Avoid Further Violations

The cited violation was the result of an isolated personnel error. In response to this occurrence, appropriate administrative action has been taken to fully review with the involved personnel the sequence of events discussed above. The need for a thorough inspection of work sites after completion of work as well as maintaining full compliance with the requirements for control of certified welding materials was clearly reinforced. The affected supervisory personnel have evaluated this occurrence, are fully aware of the sequence of events involved, and clearly understand the potential ramifications of these events. We believe that this awareness and understanding on the part of the involved personnel provides reasonable assurance that there will not be recurrence of this type of event.

(5) Date When Full Compliance Will Be Achieved

Full compliance was achieved, through the actions described in items (3) and (4) above, by May 28, 1987.