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SUBJECT: Responds to NRC 880510 ltr re violations noted in Insp Repts
 50-315/88-12 & 50-316/88-14.

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AEP:NRG:1060C

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC INSPECTION REPORT NOS. 50-315/88012 (DRP)
AND 50-316/88014 (DRP); RESPONSE TO VIOLATION

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Attn: A. B. Davis

June 8, 1988

Dear Mr. Davis:

This letter is in response to W. G. Guldemon's letter dated May 10, 1988, which forwarded the report on the routine safety inspection conducted by members of your staff. This inspection was conducted from March 15 through April 25, 1988, on activities at the Donald C. Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Guldemon's letter identified one violation. 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 ensure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

M. P. Alexich
Vice President

MPA/ldp

cc: D. H. Williams, Jr.
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R. C. Callen
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ATTACHMENT TO AEP:NRG:1060C

RESPONSE TO VIOLATION

NRC VIOLATION

"Technical Specification Surveillance Requirement 4.3.1.1.1 requires that each reactor trip system instrumentation channel shall be demonstrated [operable] by the performance of a CHANNEL CHECK for the MODES and at the frequencies shown in Table 4.3-1.

"Table 4.3-1 "Reactor Trip System Instrumentation Surveillance Requirements" requires that a CHANNEL CHECK of the power range neutron flux instruments [be performed] at least once per 12 hours when in MODES 1 or 2 and when the reactor trip system breakers are closed and the control rod drive system is capable of rod withdrawal.

"Contrary to the above, during June 26 through June 29, 1986, and again during April 16, 1987, through April 20, 1987, the licensee failed to perform the CHANNEL CHECKS at the required 12 hour frequency while Unit 2 was in MODE 3 with the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal. The longest interval where a CHANNEL CHECK was not performed as required was 35 hours."

RESPONSE TO NRC VIOLATION

(1) CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

On February 5, 1988, during procedure revision work for the Operations Department daily and shift surveillance procedure 1(2)-OHP 4030.STP.030, it was identified that channel checks of the power range nuclear instrumentation were only required in Modes 1 and 2.

Change sheets were written to the involved Unit 1 and Unit 2 procedures on February 5, 1988, to require channel checks of the power range nuclear instrumentation whenever the control rod drive system is capable of control rod withdrawal. These changes made the involved procedures consistent with the amended Technical Specifications.

The procedural deficiency was caused by cognitive personnel error when reviewing the Technical Specification amendment for impact on plant procedures, which added the requirement to perform the channel checks whenever the control rod drive system is capable of control rod withdrawal.

A second review of the Technical Specification amendment for impact on Operations Department procedures was completed on March 3, 1988. No additional deficiencies were identified.



(2) CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATION

The instructions addressing the review and implementation of Technical Specification amendments are contained in PMI-4030 "Technical Specification Review and Surveillance". Currently PMI-4030 only requires one technical review by each plant department for impact on procedures. PMI-4030 will be revised to require a second technical review by each department for future Technical Specification amendments.

(3) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on February 5, 1988, when procedures 1(2)-OHP 4030.STP.030 were revised via change sheet. PMI-4030 will be revised by June 24, 1988.

