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SUBJECT: Responds to NRC 880525 ltr re violations noted in Insp Rept
 50-316/88-12.

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AEP:NRC:1060D

Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316
License No. DPR-74
NRC INSPECTION REPORT NO. 50-316/88012 (DRS); RESPONSE TO NOTICE
OF VIOLATION

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

Attn: A. B. Davis

June 24, 1988

Dear Mr. Davis:

This letter is in response to Mr. J. J. Harrison's letter dated May 25, 1988, which forwarded the report of the special safety inspection conducted by a member of his staff. This inspection was conducted from March 16, 1988, through May 18, 1988, on activities at the Cook Nuclear Plant Unit No. 2. The Notice of Violation attached to Mr. Harrison'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 ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read 'M. P. Alexich'.

M. P. Alexich
Vice President

MPA/mbw

cc: D. H. Williams, Jr.
W. G. Smith, Jr.--Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector--Bridgman
A. B. Davis--Region III

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Attachment to AEP:NRC:1060D

Response to NRC Inspection Report No. 50-316/88012(DRS)



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Response to NRC Notice of Violation

NRC Violation

"10 CFR 50, Appendix B, Criterion III as committed to in the Quality Assurance Program Description for the Donald C. Cook Nuclear Power Plant requires that design control measures shall provide for verifying or checking the adequacy of design."

"Contrary to the above the substitution of weld material utilized for the Chemical and Volume Control System cross-tie modification did not receive an adequate engineering review in that the specified ASME Code allowable stress limits were not considered."

Response to Violation

The weld material substitution cited in the NRC Notice of Violation involved the use of Type ER308L filler in welding Type 316 stainless steel pipe on the Chemical and Volume Control System (CVCS) cross-tie piping. The welding procedure called for the use of Type 316 filler. At the time the question of using the substitute weld material occurred, it was the judgement of the AEPSC Mechanical Engineering Division Cognizant Engineer - Welding that use of the Type ER308L filler metal instead of the Type 316 filler specified in the weld procedure was acceptable under ANSI/ASME B31.1, "Power Piping" and that no stress analyses were required prior to its use. Welding filler metal acceptance is based on mechanical properties and passing an ASME IX welding procedure qualification. The substitution of Type ER308L filler was therefore accepted by the Cognizant Engineer - Welding. However, the basis for this acceptance was not documented.

(1) Corrective Action Taken and Results Achieved

In response to the NRC Inspector's concerns regarding the relationship between the CVCS pipe code allowable stresses and the use of ER308L filler metal a calculation was performed using ANSI/ASME B31.1 code allowable stresses of a lower strength material (Type 304L) which verified the acceptability of the use of Type ER308L filler to weld 316 pipe on the CVCS cross-tie. The basis for the acceptability of the substitute filler material has now been documented in the permanent file for the CVCS cross-tie modification.

(2) Corrective Action Taken to Avoid Further Violation

Our internal investigation of this event has concluded that the NRC violation cited above was an isolated occurrence resulting from cognitive personnel error. AEPSC Mechanical Engineering Division management has reviewed with the involved engineering personnel the need to provide documentary evidence of discussions concerning disposition of deviations from welding procedure specifications and the basis for acceptance of the deviations.

(3) Date when Full Compliance Will Be Achieved

Full compliance was achieved June 16, 1988, when the above corrective actions were completed.

1060D.BPL/NRC.D

