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SUBJECT: Responds to NRC 880823 ltr re violations noted in Insp Repts  
 50-315/88-16 & 50-316/88-18.Corrective actions:

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AEP:NRC:1060G

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. 50-315/88016 (DRS)  
AND 50-316/88018 (DRS)

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

Attn: A. B. Davis

September 21, 1988

Dear Mr. Davis:

This letter is in response to Mr. J. J. Harrison's letter dated August 23, 1988, that forwarded the report on the routine safety inspection conducted by members of your staff. This inspection was conducted from July 11-15, 18-22, 27 and August 8, 1988, on activities at the Donald C. Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Harrison'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.

Sincerely,

M. P. Alexich  
Vice President

MPA/eh

Attachment

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

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RESPONSE TO  
NRC INSPECTION REPORT 50-315/88016; 50-316/88018

Violation

"10 CFR 50, Appendix B, Criterion XVI, as implemented by the D. C. Cook Operations Quality Assurance Program, Section 1.7.16, requires that conditions adverse to quality be promptly corrected and action taken to preclude repetition of significant conditions adverse to quality.

Contrary to the above, a negative DC ground has existed on the Unit 1 250 VDC normally ungrounded "CD" battery since January 2, 1988. Action taken to preclude repetition was incomplete in that a comprehensive technical evaluation was not prepared to assure that the margin of safety had not been reduced for continued operations of safety-related equipment."

Corrective Action Taken and Results Achieved

At 0500 on 12/18/87, a ground was annunciated for the 250 VDC Bus CD. At that time the operators commenced actions to locate the ground in accordance with procedure 1-OHP 4021.082.012 "Location 250 VDC Grounds." The actions that were allowed with the unit at power were completed, but were unsuccessful in locating the ground. Since the ground on one polarity presented no operational problem, it was decided to continue power operation with the intent of locating and repairing the ground when the unit was shut down for other reasons. This was considered acceptable since the ungrounded 250 VDC system was designed to allow continued operation with a ground on one polarity and due to the design of the ground detection circuitry, which limits ground fault current to approximately 49 milliamps.

During a one-day outage on March 26, 1988, additional attempts were made to locate the ground, however these attempts were unsuccessful.

On July 28, 1988, during inspection activities for routine safety inspection 50-315/88016 and 50-316/88018, the inspector raised concern over the lack of a documented safety evaluation specifically for continued plant operation with a single polarity ground on the CD bus of the 250 VDC system. In response to this concern a safety evaluation was completed on August 4, 1988. This evaluation documented the position that a single pole ground would not adversely affect the operability of electrical equipment nor

preclude continued safe operation of the plant. In response to a subsequent NRC inquiry, it was also confirmed that, if a second ground were to result in a blown fuse, the operators would be alerted to the inoperability status of vital equipment via annunciators or indicating lights.

The unit was shut down on September 7, 1988, due to excessive RCS leakage. After the shutdown, testing was done and a ground was found on a feedwater heater level switch. The level switch was subsequently repaired to remove the ground.

Corrective Action to be Taken to Avoid Further Violations

Procedure OHP 4021.082.012 in both units was revised on August 10, 1988, to require each shift to log ground voltage indications when a ground exists, and to require the writing of a condition report if the ground exists for more than 48 hours. These procedure changes will ensure that a ground problem is closely monitored and that appropriate reviews and corrective action are accomplished.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on August 10, 1988, when Procedure OHP 4021.082.012 was revised to ensure that a ground problem is closely monitored and that appropriate reviews and corrective action are accomplished.

