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SUBJECT: Responds to NRC 890228 ltr re violations noted in Insp Rept  
 50-315/89-02 & 50-316/89-02.

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AEP:NRC:1090

Donald C. Cook Nuclear Plant Unit No. 2  
Docket No. 50-316  
License No. DPR-74  
INSPECTION REPORTS 50-315/89002 (DRP) AND  
50-316/89002 (DRP); RESPONSE TO VIOLATION

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

Attn: A. B. Davis


March 31, 1989

Dear Mr. Davis:

This letter is in response to W. L. Axelson's letter dated February 28, 1989, which forwarded the report on the routine safety inspection conducted by members of your staff. This inspection was conducted from December 28, 1988 through February 7, 1989 on activities at Donald C. Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Axelson's letter identified one violation associated with the "CD" emergency diesel generator at Cook Nuclear Plant Unit 2. This violation is addressed in the attachment to this letter.

This document has been prepared following Corporate procedures that incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,

  
M. P. Alexich  
Vice President

ldp  
Attachment

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

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ATTACHMENT TO AEP:NRC:1090

RESPONSE TO VIOLATION



### NRC Violation

"Unit 2 Technical Specification 6.8.1.a requires written procedures be implemented as recommended in Appendix "A" of Regulatory Guide 1.33, November 1972, which includes (at Section I.5) general procedures for the control of maintenance, replacement and modification work. Licensee Procedure PMI-2290 "Job Orders" is the general procedure for administering such work, and it prohibits declaring a safety related system or component operable with unapproved parts or materials installed (Section 3.7.1) and restricts work performed by Job Order to the scope of work indicated on the Job Order form (Section 3.8.3).

"Contrary to the above, the Unit 2 "CD" emergency diesel generator was declared operable on December 29, 1988, following maintenance under Job Orders No. 018459 (main bearing replacement) and No. 020974 (18-month inspection) with unapproved material (gasket stock) installed, in lieu of a rubber grommet, on one fuel line penetration through the fulcrum box. Fabrication and installation of the replacement grommet were not within the scope of work indicated on either Job Order form."

### Response to Violation

During the course of a scheduled 18-month inspection of the Unit 2 "CD" emergency diesel generator, a rubber grommet installed in a fuel line to the diesel was found to be in a degraded condition due to normal wear. In accordance with the applicable maintenance procedure, a job order for replacement of the grommet was initiated. The degraded grommet was then replaced with unapproved material installed temporarily to protect the fuel line while a combined operations and maintenance run of the diesel was conducted. Upon completion of the combined run, the diesel was declared operable.

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

All maintenance supervisors were reinstructed that any changes made to equipment as a result of maintenance activities must be approved prior to declaring equipment operable. Written approval of alternate material for the case cited in the NRC Notice of Violation was provided on December 30, 1988. The grommet was replaced with the approved material on January 20, 1989 under Job Order No. 39685.

#### (2) Corrective Action Taken to Avoid Further Violation

The actions taken in (1) above are designed to increase the awareness of maintenance personnel to the necessity for strict compliance with maintenance procedures concerning

parts replacement. We believe that our strong procedural prohibition against unauthorized parts substitution coupled with this additional training will be effective in minimizing the incidence of this type of violation.

(3) Date When Full Compliance Will Be Achieved

Full compliance was achieved on December 30, 1988 when approval for use of alternate grommet material in the fuel line was received from the AEPSC Nuclear Engineering Department.