INDIANA & MICHIGAN ELECTRIC COMPANY

P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

Donald C. Cook Nuclear Plant Units No. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
IE Inspection Reports No. 50-315/80-04 and
No. 50-316/80-03
Response to Notice of Violation

May 30, 1980
AEP:NRC:00413

Mr. James G. Keppler, Regional Director
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

The Attachment to this letter is our response to the Notice of Violation cited in Appendix A to Mr. R. F. Heishman's letter of May 2, 1980. On May 23, 1980 our Dr. Castresana obtained an extension to the due date of this submittal until May 30, 1980 from your Mr. Heishman.

Very truly yours,

John E. Dolan

John E. Dolan
Vice President

JED:dfs

Attachment

cc: R. C. Callen
G. Charnoff
R. S. Hunter
R. W. Jurgensen
D. V. Shaller - Bridgman

JUN 2 1980

8007310284

Violation 1

Technical Specification 6.8.1 requires implementation of procedures. 12-OHP-4021.018.004 "Draining or Adjusting Level in the Spent Fuel Pit" details the procedure for raising level in the SFP.

Contrary to the above, this procedure was not used for increasing level in the SFP between March 15, 1980 and March 17, 1980, when the pool was overfilled and cross-contamination of the demineralized water system occurred.

Response:

During the fuel storage rack modification, demineralized water was being used at the spent fuel pit for two purposes: 1) as a supply of clean water for decontamination of the old racks being removed, and 2) as a source of priming water for a vacuum pump used for cleaning the spent fuel pit floor.

The demineralized water system contamination investigation revealed that the cross contamination of the demineralized water header occurred through the hose connection used for the vacuum pump priming. The one end of the hose was found disconnected from the vacuum pump and the free end left hanging submerged in the spent fuel pit. It is believed that the shut off valve at the demineralized water header hose connection had been left open. This would permit water to flow into the pit whenever the demineralized water booster pump was running. The booster pump is required to supply water at this elevation. When the booster pump was shut down, the low header pressure would permit water to be siphoned from the spent fuel pit into the demineralized water header.

The daily spent fuel pit level readings show a gradual increase in level until the spent fuel pit was found overflowing into the fuel transfer canal. The level was then lowered in accordance with approved procedures. During the time leading up to the cross contamination of the demineralized water header and the overflowing of the spent fuel pit, there was no intentional action to raise the level in the spent fuel pit and therefore the citation for failure to use an approved procedure for increasing the level does not seem warranted.

It is felt that the root cause for this entire incident, the increase in spent fuel pit level, the dilution of the boron concentration below the required minimum, and the cross contamination of the demineralized water header, can be attributed to a breakdown in the control of the activities associated with the spent fuel rack modification. Positive steps have been taken, as indicated below, to prevent the re-occurrence of a similar event.

JUN 2

Actions Taken to Prevent Re-Occurence

1. A precaution has been added to Procedure 12-OHP-4021-018.004 to prevent the use of hoses for making up water to the spent fuel pit.

2. The demineralized water valves in the vicinity of the spent fuel pit have been locked closed with Operations Department padlocks. This will assure notification of the operators prior to future use of these valves.

3. Check valves have been installed at the demineralized water outlets in the vicinity of the spent fuel pit to prevent backflow and cross-contamination of the demineralized water system.

4. Controls have been imposed on the use of demineralized water from Laboratories for human consumption purposes.

Violation 2:

Amendment #32 to NRC Operating License Number DPR-58 and Amendment #13 to DPR-74 require a minimum of 2000 ppm Boron concentration in the Spent Fuel Pit during changeout from old racks to new high density fuel storage racks.

Contrary to the above, on March 17, 1980, the SFP concentration was found to be less than 2000 ppm (1954 ppm).

Response:

The dilution of the spent fuel pit resulted from the unintentional addition of water to the spent fuel pit as described in Violation 1. Corrective actions were immediately initiated to increase boron concentration to greater than 2000 ppm upon discovery of the low concentration.

Actions Taken to Prevent Re-Occurence

The specific requirements of Amendment #32, to NRC Operating License DPR-58 and Amendment #13 to DPR-74, requiring a minimum of 2000 ppm boron in the spent fuel pit, no longer exist since the spent fuel storage rack modification is now complete. The preventive actions discussed under Violation 1 apply generically to this condition.