Sturmann
DMB

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

March 12, 1986
AEP:NRC:0978

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC INSPECTION REPORT NOS. 50-315/85041(DRS)
AND 50-316/85041(DRS)

Mr. James G. Keppler
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

This letter is in response to Mr. N. J. Chrissotimos' letter dated February 11, 1986, which forwarded the routine safety inspection conducted by members of your staff. This inspection was conducted from December 10, 1985 through January 20, 1986 on activities at the D. C. Cook Nuclear Plant Units 1 and 2. The notice of violation attached to Mr. Chrissotimos' letter identified two violations. The responses to these two violations are addressed in the attachment to this letter.

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

Very truly yours,

M. P. Alexich
Vice President

Attachment
MPA/rjn

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman

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NRC Violation No. 1

"Units 1 and 2 Technical Specifications 3.9.7. state: 'Loads in excess of 2500 pounds shall be prohibited from travel over fuel assemblies in the storage pool. Loads carried over the spent fuel pool and heights at which they may be carried over racks containing fuel shall be limited in such a way as to preclude impact energies over 24,240 in.-lbs., if the loads are dropped from the crane.' Procedure 12 MHP 5021.001.036 implements Specifications 3.9.7 and requires that heavy loads specified in Table 3.C.1, Attachment 1, be transported only over color coded safe load zones.

Contrary to the above, on December 13, 1985, at approximately 2:20 p.m., a two ton metal waste container bin, which is a heavy load specified in Table 3.C.1, Attachment 1, was transported outside the designated safe load zone.

This is a Severity Level V violation (Supplement I)."

Response to Violation No. 1

Corrective Actions Taken and Results Achieved

The movement of trash dumpsters was halted until further notice by the Plant Manager on December 20, when this item was brought to his attention. Subsequently, all crane movement through the area was prohibited until this matter could be clarified. The freeze was lifted following discussions with the NRR in reference to our letter AEP:NRC:0514N, dated January 29, 1986. In addition, we have been granted emergency technical specification relief until February 28, 1987 for movement of the main load block over the spent fuel pool as per our letter AEP:NRC:05140 dated February 14, 1986.

Corrective Action to be Taken to Avoid Further Violation

On February 28, 1986, classroom training was given to craft and permanent employees qualified as crane operators on the changes to Technical Specification 3.9.7. Emphasis was placed on the reason the area bordering the spent fuel pool is restricted and that all heavy loads are to be transported within the designated safe load path (orange painted area).

Date When Full Compliance Will be Achieved

Full compliance in accordance with Amendments 93 and 79 was achieved on February 28, 1986, when the above corrective action was implemented.

NRC Violation No. 2

"Units 1 and 2 Technical Specifications 6.8.1.a require written procedures be established, implemented and maintained covering the activities recommended in Appendix 'A' of Regulatory Guide 1.33,

November 1972, which includes at Paragraph I.1 written procedures, documented instructions or drawings appropriate to the circumstances for maintenance which can affect the performance of safety related equipment.

Contrary to the above, the licensee failed to establish, implement or maintain appropriate instructions concerning erection of scaffolding in plant areas containing safety related equipment. As a consequence, a single large scaffold was in place on December 13, 1985 in such a configuration as to call the seismic qualification and protection of both trains of Unit 1 essential service water into question at a time (Mode 3) both trains were required operable.

This is a Severity Level IV violation (Supplement I)."

Response to Violation No. 2

Corrective Action Taken and Results Achieved

The ESW scaffolding was immediately dismantled, and a freeze was placed on any further scaffold erection until proper controls could be implemented. A list was developed of scaffolding that was built over or interacted with safety-related equipment. Those scaffolds of primary concern were dismantled or modified as required. The freeze was lifted and the Planning Superintendent was directed to implement controls for scaffold erection. A Plant Manager Standing Order (PMSO) to control scaffold erection was issued on February 28, 1986.

Corrective Action to be Taken to Avoid Further Non-Compliance

Please refer to information contained under previous heading "Corrective Action Taken and Results Achieved."

Date When Full Compliance Will be Achieved

Full compliance was achieved on February 28, 1986, when the PMSO controlling scaffold erection was approved.

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