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 50-315/89-20.

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AEP:NRC:1090G

Donald C. Cook Nuclear Plant Unit 1  
Docket No. 50-315  
License No. DPR-58  
INSPECTION REPORT 50-315/89020; RESPONSE TO VIOLATION

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

Attn: A. B. Davis

September 8, 1989

Dear Mr. Davis:

This letter is in response to R. W. Cooper's letter dated August 9, 1989, which forwarded the report of the special safety inspection conducted from May 22 through May 25, 1989, and on July 7, 1989, on activities at Donald C. Cook Nuclear Plant Unit 1. The Notice of Violation attached to Mr. Cooper's letter identified one severity level IV violation associated with repairs made on the Unit 1 CD emergency diesel following a diesel overspeed event. 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

Attachments

cc; D. H. Williams, Jr.  
W. G. Smith, Jr. - Bridgman  
R. C. Callen  
G. Charnoff  
NRC Resident Inspector - Bridgman  
NFEM Section Chief

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ATTACHMENT TO AEP:NRG:1090G

RESPONSE TO VIOLATION

NRC VIOLATION

"10 CFR 50 Appendix B, Criterion V, as implemented by the D. C. Cook Operational Quality Assurance Program, requires that activities affecting quality be prescribed by documented instructions or procedures and that work be accomplished in accordance with these instructions or procedures.

Contrary to the above:

- A. Paragraph 4.4.3 of procedure PMI-2290 required that "all work performed via a job order must be within the scope of the job order form." Due to an overspeed problem, extensive additional inspection and rework was performed on job order 761729 even though the scope of the job order was to perform the normal 18 month inspection of the Unit 1 CD emergency diesel (315/89020-01A).
- B. Paragraph 4.4.2 of procedure PMI-2290 required that, when specified, individuals performing work will obtain the approval of the Unit Supervisor, the Assistant Shift Supervisor or the Shift Supervisor prior to starting work. Although this approval requirement was specified on job order A010547 for testing of Unit 1 CD emergency diesel generator, this block was not signed and there was no objective evidence that the required approval was obtained prior to starting work (315/89020/01B).

This is a Severity Level IV violation (Supplement 1)."

RESPONSE TO VIOLATION

Part A

The additional work referenced in the cited violation consisted of rotor changeout and main bearing replacement on the Unit 1 CD emergency diesel.

The generator rotor changeout was incorrectly included in the "Description of Work Done" section of job order 761729. The generator rotor was, in fact, changed out under job orders A010531 and A005765 and the scope of work was correctly specified and completed in those job orders.

The decision to replace the main bearings on the Unit 1 CD emergency diesel engine was made by the appropriate planning and engineering personnel. This action is consistent with the scope of the emergency diesel generator system 18-month inspection procedure referenced on job order 761729 (\*\*12MHP4030.STP.046). Step 7.1 of the procedure states, in part, that "The general plan for the inspection is: ...to analyze the data obtained and determine the corrective action necessary..." and "to make the

necessary repairs...." The inspection procedure further states that main bearing work be done "in accordance with \*\*12MHP5021.032.017" which is the emergency diesel engine main bearing removal, inspection and installation procedure.

#### Part B

Job order A010547 was written to perform special post maintenance testing of the Unit 1 CD diesel following repairs made as a result of the overspeed event. The job order required written approval from the Shift Supervisor, Assistant Shift Supervisor, or the Unit Supervisor to begin work. The intent of this requirement is to assure that the Shift Supervisor and Operations Department personnel are aware of and approved of an activity prior to its initiation. Our investigation of this issue showed that Operations Department personnel were briefed prior to the start of the test and the required approval (although not documented) was received. In addition, review of the control room operating logs shows that the operators were aware of the test when it was necessary to run the diesel. Further, Operations personnel were directly involved with the testing both locally at the diesel generator and in the control room. Therefore the intent of the signature requirement was met. The cited violation resulted from the failure to document the approval with a signature on the job order.

In view of the fact that both examples given in the Notice of Violation were administrative oversights of relatively little significance versus procedural noncompliances, we request that the severity level of the cited violation be reduced from level IV to level V.

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

In neither of the examples cited were immediate corrective actions necessary. As noted above, we believe that the work performed in the instance cited in Part A was in accordance with the applicable plant procedures. In Part B the violation resulted from a failure to properly document approval for test performance rather than a failure to obtain the required approval.

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

In response to Part A, involved personnel have been reinstructed as to the importance of providing complete clarity in the scope of work as described in the job order and of accurately reflecting the work actually completed under the job order.

To avoid further violations of the sort described in Part B, the importance of compliance with administrative rules associated with documenting required supervisory approval for these types of evolutions has been reiterated to the appropriate personnel.

(3) Date When Full Compliance will be Achieved

The activities discussed in (2) above were complete as of September 1, 1989.