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 50-315/89-20.

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AEP:NRC:1090K

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

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

Attn: A. B. Davis

October 13, 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. Our letter (AEP:NRC:1090G) of September 8, 1989, responded to the severity level IV violation cited in the Notice of Violation attached to Mr. Cooper's letter. Through subsequent discussions with your staff we understand that the originally cited level IV violation has been reduced to severity level V. We appreciate your favorable consideration of our request in this area.

Mr. Cooper's letter also requested a description of actions we have taken with regard to an unresolved item identified during the inspection. Due to an oversight this information was not included as part of our September 8 response to the Notice of Violation. The attachment to this letter provides the requested response to the unresolved item.

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

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Mr. A. B. Davis

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AEP:NRC:1090K

cc: D. H. Williams, Jr.

A. A. Blind - Bridgman

R. C. Callen

G. Charnoff

NRC Resident Inspector - Bridgman

NFEM Section Chief

Mr. A. B. Davis

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AEP:NRC:1090K

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S. H. Steinhart/S. P. Hodge
J. Glitter, NRC - Washington, D.C.
DC-N-6015.1
AEP:NRC:1090K

ATTACHMENT TO AEP:NRC:1090K

RESPONSE TO UNRESOLVED ITEM 315/89020-02



NRC Unresolved Item

During the Region III inspection of maintenance activities performed on the Unit 1 CD emergency diesel, the following unresolved item was generated:

"...the inspector noted that the measurement of main bearing clearance for No. 4 bearing required by Paragraph 7.2.1 of Procedure 12MHP4030.STP.046, "Emergency Diesel Generator System 18 Month Inspection," Revision 1, was recorded as .09. The acceptance criteria specified in the procedure was .007 to .014. The recorded value was more than six times the maximum allowed value. This recorded deviation was not noted by licensee personnel prior to engine start or on subsequent reviews and therefore, there was no assurance that inspection requirements were met. Based on discussions with the licensee, it appeared that the value was improperly recorded. In addition, because of the overspeed problem, the bearing was changed and new measurements were taken. These measurements were well within the specified tolerances. Due to the bearing change, no hardware problems were evident, however, it appeared that additional management attention should be provided in this area as future incidents of this type could result in significant hardware damage. This matter is unresolved pending review during a subsequent inspection (315/89020-02)."

Response to Unresolved Item

Our investigation of the instance cited in the unresolved item concluded that the initial main bearing clearance measurements were within the acceptance criteria but were incorrectly recorded in completing the maintenance procedure in that 0.09 inch was recorded versus the actual measured clearance of .009 inch. The decimal point in the recorded value was indistinct and the recorded value was therefore apparently misread during subsequent review. Consequently, the error in the recorded value was not identified in the course of normal supervisory approval of the completed procedure.

The unresolved item stated above also raised the more general issue of the adequacy of existing controls in ensuring that, following maintenance/inspection activities, equipment is not operated until it is confirmed that all hardware acceptance criteria have been satisfied. We have reviewed our procedures of the type identified in the unresolved item and have confirmed that supervisory reviews of the completed procedures include verification that acceptance criteria have been fulfilled before equipment is operated. Our review of the existing administrative requirements in this area has therefore concluded that the procedural controls presently in place are appropriate to minimize the potential for post-maintenance/



inspection damage to equipment resulting from operation of the equipment before all acceptance criteria have been fulfilled. We will, however, reemphasize to involved personnel the importance of accurate documentation of the completion of procedure steps and compliance with the requirements of existing procedures. In addition, we will monitor this area through our condition report system to ensure that any adverse trends can be quickly identified and appropriate corrective action taken.