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ALEXICH, M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
RECIP. NAME RECIPIENT AFFILIATION
DAVIS, A.B. NRC - No Detailed Affiliation Given

SUBJECT: Responds to NRC 900601 ltr re violations noted in Insp Repts
50-315/89-31 & 50-316/89-31.

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Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
RESPONSE TO LETTER DATED JUNE 1, 1990 PERTAINING TO
NRC INSPECTION NOS. 50-315/89031 AND 50-316/89031

ATTN: A. B. Davis

July 12, 1990

Dear Mr. Davis:

This letter is in response to Mr. H. J. Miller's letter dated June 1, 1990, which summarized the results of the meeting conducted between members of our staffs on May 9, 1990 at the Region III office. Attachment 1 to this letter provides the additional information you requested concerning violations 1.b, 1.d, 3 and 4.a, cited by the special maintenance team during their inspection conducted at Cook Nuclear Plant from December 4 through 8, and December 18 through 22, 1989.

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

dfw

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
NRC Resident Inspector - Bridgman
NFEM Section Chief

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ATTACHMENT 1

REQUESTED ADDITIONAL INFORMATION

VIOLATION 1.b., THERMAL OVERLOAD SAMPLE SIZE

NRC Request

Provide additional information about the significance of the thermal overload problem by increasing the scope of the sample size.

Response

Based on questions raised at the May 9, 1990 meeting and reiterated in the NRC letter dated June 1, 1990, the following actions have been taken regarding thermal overloads used in Cook Nuclear Plant.

Between May and June 1990, a total of 196 thermal overloads were inspected at Cook Nuclear Plant to expand the sample size as requested. Results of the inspection have been forwarded to AEPSC, where the data is being evaluated against an engineering guide developed to resolve the issue. An engineering review of the data will be completed by September 1, 1990. Included in that review will be an evaluation of 19 thermal overloads inspected in the expanded sample that involved questions regarding sizing or positioning.

As stated during the May 9 meeting, it is our position that there was no significant impact on plant equipment from thermal overload positioning or sizing. The initial study of the issue, completed prior to the May 9 meeting, identified to our satisfaction that there was no adverse effect on the operability of plant equipment.



VIOLATION 1.d. (Rescinded), PROCEDURE DICHOTOMY

NRC Request

Correct the apparent dichotomy between the procedures for the turbine and motor driven auxiliary feedwater pumps and provide information about the existing surveillance procedures that ensure proper pump packing adjustment.

Response

Although the wording in the two procedures differs, this discrepancy would not have precluded adequate inspection of the turbine and motor driven auxiliary feedwater pumps. Nevertheless, the procedures will be rewritten as part of the Cook Nuclear Plant Maintenance Department's ongoing procedure upgrade, to ensure that a visual inspection for packing leaks while the pumps are running is performed, and that required corrective action is taken.

It is important to note that the procedures in question are used for repair work rather than surveillance, which is defined at Cook Nuclear Plant as a test of operable equipment. The surveillance procedures for these pumps require the appropriate maintenance to be performed in the event of excessive leakage during pump starts.

VIOLATION 3, ELECTRICAL TESTING TECHNIQUE

NRC Request

Provide information regarding how electrical testing techniques will be improved and whether any other test gear is in use at Cook Nuclear Plant whose usage may date from initial startup and for which the reason for usage cannot be determined (as stated for the voltmeter in question).

Response

The electrical testing techniques have been improved by using the Fluke Model 45 digital meter during testing of the 4KV diesel start and 4KV ESS bus undervoltage relays. This meter has direct readout and an accuracy of ± 0.3 percent. The calibration procedures were changed to specify the use of the Fluke Model 45, or its equivalent, on April 5, 1990.

A review was performed in order to determine whether any other test gear is in use at Cook Nuclear Plant whose usage may date from initial startup and to verify that the initial adequacy evaluations performed at that time were correct. The review encompassed all of the Maintenance Department I&C and electrical procedures. In all cases, the test gear was found to satisfy the accuracy requirements and to be suitable for each application regarding equipment compatibility and human factors considerations. Based on the results of this review, we believe this problem is an isolated occurrence due to a single oversight during the initial test program and requires no further corrective actions.

VIOLATION 4.a (Rescinded), 4KV BREAKER LUBRICATION/TESTING

NRC Request

Address the following failures, their cause, operability of Unit 2 during the period the questionable conditions existed, and corrective actions to prevent recurrence: Breaker T11D11 (West MDAFP) on April 17, 1989; and Breaker T11D1 (EP Feed) on April 26, 1986. In addition, address the differences in the test methodology used when the Unit 1 breakers were tested in early 1989 during preventative maintenance (outside the cubicle) and failed, as compared to when the breakers were tested inside the 4.16 KC cubicle and did not fail. Include probable cause for failure outside the cubicle.

Response

The breakers in question are for the east and west Unit 1 motor driven auxiliary feedwater pumps and the emergency power breaker. It should be noted that the emergency power breaker is left open and is not tested under operating conditions. Breakers for both pumps were tested prior to cleaning and lubrication with satisfactory results. In monthly tests since the test failures, the breakers have performed properly. Consequently, it is our position that the breakers have closed properly on demand and will continue to do so. In addition, we believe the cleaning/lubrication process had no adverse impact on the operability of the breakers. This position is supported by ABB's May 11, 1990 letter to us.

The manufacturer of the 4KV breakers, ABB Power Distribution Inc, stated in their May 11, 1990 letter to us that, "The cleaning and relubricating procedure for the ABB 4KV circuit breakers performed at the D. C. Cook Nuclear Plant in March 1989 was an acceptable procedure." The Cook Nuclear Plant Resident Inspector has been given a copy of this letter. Based on this letter and the test results since the failures, we believe that the safe operation of Unit 2 is not a concern.

We have reviewed the data and the sequence of events associated with the failures during preventative maintenance and have been unable to ascertain the exact cause of the failures. However, there are at least two possibilities. First, the breakers were removed from their cubicle and tested in the 4KV room. This room is extremely well ventilated and cooler than the cubicles where the breakers are installed. The temperature differential experienced by the breakers may be a contributing factor to their failure.

VIOLATION 4.a, 4KV BREAKER LUBRICATION/TESTING

Response (cont'd)

Second, as we stated at the meeting, the crew performing the testing may be at fault. However, while all three failures did occur on breakers tested by the same crew, other breakers cleaned and lubricated by this crew tested satisfactorily. In addition, it should be noted that the breakers that failed had passed tests both prior and subsequent to the failed test.

During the current Unit 2 outage we will be contracting ABB personnel to clean and inspect the 4KV breakers. After cleaning, we plan to lubricate the breakers with Anderol 757. We do not plan to use Anderol 732. However, ABB has advised us that use of Anderol 732 in Unit 1 is adequate until the "next scheduled maintenance period," which they stated may not be necessary for 15 years.