

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9002230014 DOC. DATE: 90/02/09 NOTARIZED: NO DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME AUTHOR AFFILIATION
 ALEXICH, M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION
 DAVIS, M.P. Document Control Branch (Document Control Desk)

SUBJECT: Responds to WL Axelson 900112 ltr re violations noted in
 Insp Repts 50/315/89-33 & 50-316/89-33.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR () ENCL () SIZE: 8
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD3-1 PD	1 1	GIITTER, J.	1 1
INTERNAL:	AEOD	1 1	AEOD/DEIIB	1 1
	AEOD/TPAD	1 1	DEDRO	1 1
	NRR SHANKMAN, S	1 1	NRR/DLPQ/LPEB10	1 1
	NRR/DOEA DIR 11	1 1	NRR/DREP/PEPB9D	1 1
	NRR/DREP/PRPB11	2 2	NRR/DRIS/DIR	1 1
	NRR/DST/DIR 8E2	1 1	NRR/PMAS/ILRB12	1 1
	NUDOCS-ABSTRACT	1 1	OE LIEBERMAN, J	1 1
	OGC/HDS1	1 1	REG FILE 02	1 1
	RES MORISSEAU, D	1 1	RGN3 FILE 01	1 1
EXTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 24 ENCL 24



AEP:NRC:1090M

Donald C. Cook Nuclear Plant Unit 2
Docket No. 50-316
License No. DPR-74
INSPECTION REPORTS 50-315/89033 (DPR) AND 50-316/89033 (DPR);
RESPONSE TO NOTICE OF VIOLATION

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

Attn: A. B. Davis

February 9, 1990

Dear Mr. Davis:

This letter is in response to Mr. W. L. Axelson's letter dated January 12, 1990, which forwarded the report of a routine safety inspection conducted by members of your staff from November 17 through December 26, 1989, on activities at Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Axelson's letter identified one Severity Level IV violation at Unit 2 involving operation of the unit above its licensed thermal power. The attachment to this letter provides our response to the Notice of Violation.

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

MPA/eh
Attachment

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
R. C. Callen
G. Charnoff
NFEM Section Chief
T. E. Murley
NRC Resident Inspector - Bridgman

ATTACHMENT TO AEP:NRC:1090M

RESPONSE TO NOTICE OF VIOLATION



NRC Violation

"As a result of the inspection conducted on November 17 through December 26, 1989, and in accordance with the General Policy and Procedures for NRC Enforcement Actions (10 CFR Part 2, Appendix C), the following violation was identified:

The Unit 2 Operating License (DPR-74, as amended) at Paragraph 2.C(1), authorizes operation of the facility at steady state reactor core power levels not to exceed 3411 megawatts thermal.

Contrary to the above, due to an outdated computer core image tape loaded on October 25, 1989, steady state reactor core power exceeded 3411 megawatts routinely until the error was discovered on November 8, 1989. The maximum power deviation was less than 26 megawatts throughout this interval.

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

Response to Violation

On October 25, 1989, following maintenance on the P-250 computer, a core image tape containing incorrect values for the blowdown constants was loaded into the computer. The core image tape is used to initialize values for various plant parameters input to the P-250. These values are used by the Thermal Output Program of the P-250 in monitoring reactor power level to verify that the licensed maximum power (3411 megawatts thermal for Unit 2) is not exceeded. The value assigned to a constant can only be changed by manually inputting the new value or reloading a core image tape that contains a different value. A list of safety constants is maintained on a change monitoring program which provides a printout of any changes made to constants in the program. These safety constants are confirmed to be correct each time a core image tape is loaded into the P-250 computer. The blowdown constants were not included in the list of safety constants and were therefore not confirmed to be correct when the core image tape was loaded into the computer on October 25, 1989. Use of incorrect values for the blowdown constants in the Thermal Output Program caused the program to calculate a reactor power lower than that which actually existed. The error was discovered and corrected on November 8, 1989. The maximum deviation in actual reactor power was less than 26 megawatts above the licensed limit and well within the 2 percent overpower assumed as a starting point in accident analysis.

(1) Corrective Actions Taken and Results Achieved

The correct values for the blowdown constants were manually entered into the Thermal Output Program on November 8, 1989, which assured that Unit 2 thermal power would be maintained less than 3411 megawatts thermal. All constants used by the Thermal Output Program have been included in the list of safety constants maintained on the change monitoring program discussed above. In addition, use of the operator's console to manually change the values of constants in the Thermal Output Program, as well as a description of the changes made, is now recorded in a log book which is reviewed by the Cook Nuclear Plant Computer Section. Further, use of positive key control for the operator console has been implemented.

(2) Corrective Action Taken to Avoid Further Violation

In order to confirm that no other errors exist in the values of constants used for input into the P-250 computer, all P-250 constants (not limited to only those currently in the change monitoring program) will be reviewed. Documentation of all constants used by the Thermal Output Program as well as any other important constants identified in our review will be prepared and added to the change monitoring program. The constants in the change monitoring program along with their current correct values will then be placed on a controlled list and any change to these constants will also be subject to positive control. The review of P-250 constants will be completed by March 15, 1990; the controlled list will be in place by April 15, 1990.

In addition to the above, formal procedures will be implemented to routinely check and evaluate the P-250 computer printout of changes to the computer constants and to verify the correct values of constants immediately after each reload of the core image tape into the P-250. These procedures will be in place by May 15, 1990 and June 15, 1990, respectively.

(3) Date When Full Compliance will be Achieved

Full compliance was achieved on November 8, 1989, when the correct blowdown constant values were input into the Thermal Output Program and Unit 2 power was returned to less than 3411 megawatts thermal.

Indiana Michigan
Power Company
P.O. Box 16631
Columbus, OH 43216



AEP:NRC:1090M

Donald C. Cook Nuclear Plant Unit 2
Docket No. 50-316
License No. DPR-74
INSPECTION REPORTS 50-315/89033 (DPR) AND 50-316/89033 (DPR);
RESPONSE TO NOTICE OF VIOLATION

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

Attn: A. B. Davis

February 9, 1990

Dear Mr. Davis: .

This letter is in response to Mr. W. L. Axelson's letter dated January 12, 1990, which forwarded the report of a routine safety inspection conducted by members of your staff from November 17 through December 26, 1989, on activities at Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Axelson's letter identified one Severity Level IV violation at Unit 2 involving operation of the unit above its licensed thermal power. The attachment to this letter provides our response to the Notice of Violation.

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,

A handwritten signature in dark ink, appearing to read 'M. P. Alexich', is written over the typed name.

M. P. Alexich
Vice President

MPA/eh

Attachment

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
R. C. Callen
G. Charnoff
NFEM Section Chief
T. E. Murley
NRC Resident Inspector - Bridgman



AEP:NRC:1090M

Donald C. Cook Nuclear Plant Unit 2
Docket No. 50-316
License No. DPR-74
INSPECTION REPORTS 50-315/89033 (DPR) AND 50-316/89033 (DPR);
RESPONSE TO NOTICE OF VIOLATION

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

Attn: A. B. Davis

February 9, 1990

Dear Mr. Davis:

This letter is in response to Mr. W. L. Axelson's letter dated January 12, 1990, which forwarded the report of a routine safety inspection conducted by members of your staff from November 17 through December 26, 1989, on activities at Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Axelson's letter identified one Severity Level IV violation at Unit 2 involving operation of the unit above its licensed thermal power. The attachment to this letter provides our response to the Notice of Violation.

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,

A handwritten signature in cursive script, appearing to read 'M. P. Alexich'.

M. P. Alexich
Vice President

MPA/eh
Attachment

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
R. C. Callen
G. Charnoff
NFEM Section Chief
T. E. Murley
NRC Resident Inspector - Bridgman



AEP:NRC:1090M

Donald C. Cook Nuclear Plant Unit 2
Docket No. 50-316
License No. DPR-74
INSPECTION REPORTS 50-315/89033 (DPR) AND 50-316/89033 (DPR);
RESPONSE TO NOTICE OF VIOLATION

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

Attn: A. B. Davis

February 9, 1990

Dear Mr. Davis:

This letter is in response to Mr. W. L. Axelson's letter dated January 12, 1990, which forwarded the report of a routine safety inspection conducted by members of your staff from November 17 through December 26, 1989, on activities at Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Axelson's letter identified one Severity Level IV violation at Unit 2 involving operation of the unit above its licensed thermal power. The attachment to this letter provides our response to the Notice of Violation.

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,

A handwritten signature in cursive script, appearing to read 'M. P. Alexich'.

M. P. Alexich
Vice President

MPA/eh
Attachment

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
R. C. Callen
G. Charnoff
NFEM Section Chief
T. E. Murley
NRC Resident Inspector - Bridgman

Indiana Michigan
Power Company
P.O. Box 16631
Columbus, OH 43216



AEP:NRC:1090M

Donald C. Cook Nuclear Plant Unit 2
Docket No. 50-316
License No. DPR-74
INSPECTION REPORTS 50-315/89033 (DPR) AND 50-316/89033 (DPR);
RESPONSE TO NOTICE OF VIOLATION

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

Attn: A. B. Davis

February 9, 1990

Dear Mr. Davis:

This letter is in response to Mr. W. L. Axelson's letter dated January 12, 1990, which forwarded the report of a routine safety inspection conducted by members of your staff from November 17 through December 26, 1989, on activities at Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Axelson's letter identified one Severity Level IV violation at Unit 2 involving operation of the unit above its licensed thermal power. The attachment to this letter provides our response to the Notice of Violation.

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,

A handwritten signature in dark ink, appearing to read 'M. P. Alexich'.

M. P. Alexich
Vice President

MPA/eh
Attachment

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
R. C. Callen
G. Charnoff
NFEM Section Chief
T. E. Murley
NRC Resident Inspector - Bridgman

