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 RECIP. NAME RECIPIENT AFFILIATION  
 DAVIS, A.B. Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 901119 ltr re violations noted in Insp Rept  
 50-316/90-22. Corrective actions: written mgt directive  
 initiated to mechanic & mechanic supervisor outlining nature  
 of procedural violation.

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AEP:NRC:1125J

Donald C. Cook Nuclear Plant Unit 2  
Docket No. 50-316  
License No. DPR-74  
INSPECTION REPORTS 50-315/90022 (DRP) AND  
50-316/90022 (DRP); RESPONSE TO NOTICE OF VIOLATION

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

Attn: A. B. Davis

December 19, 1990

Dear Mr. Davis:

This letter is in response to Mr. B. Clayton's letter dated November 19, 1990, which forwarded the report of a routine safety inspection conducted by members of your staff from August 29 through October 9, 1990, on activities at Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Clayton's letter identified one Severity Level IV violation associated with performance of maintenance activities in Unit 2 without approved procedures. 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

ldp

Attachment

1501  
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Mr. A. B. Davis

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AEP:NRC:1125J

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

ATTACHMENT TO AEP:NRC:1125J

RESPONSE TO NOTICE OF VIOLATION



## NRC Violation

"Unit 2 Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained such as those listed in Appendix A of Regulatory Guide 1.33, November 1972. Appendix A of Regulatory Guide 1.33 includes (Section I.1) procedures for performing maintenance which can affect the performance of safety-related equipment and requires that these procedures be performed in accordance with written procedures. Technical Specification 6.8.2 required that each procedure used for activities referenced in Unit 2 Technical Specification 6.8.1 shall be reviewed by the Plant Nuclear Safety Review Committee (PNSRC) and approved by the Plant Manager.

Contrary to the above, the following examples of a violation of this requirement were identified:

- a. Licensee procedure PMI 2010 required that any procedure designated with a double asterisk be present and used at the job site. On August 16, 1990, maintenance involving the reassembly of the seal assembly on the Unit 2 North Safety Injection Pump, was performed incorrectly and without the use of Procedure \*\*12 MHP 5021.008.001, a procedure with a double asterisk.
- b. On September 19, 1990, maintenance to replace a diaphragm on safety related valve 2-NRV-153 was performed without a procedure.
- c. On October 1, 1990, maintenance involving the installation of a diaphragm on the air actuator of power operated relief valve 2-NRV-152 was performed without the use of a procedure reviewed by the PNSRC and approved by the Plant Manager.

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

## Response to Violation Part a.

During the recently completed Unit 2 refueling outage planned maintenance was performed on the No. 2 north safety injection pump. The maintenance activities included replacement of the rotating assembly, bearings, gaskets and mechanical seals. The job order covering these activities called for the use of procedure No. \*\*12 MHP 5021.008.001, "Safety Injection Pump Disassembly, Repair and Reassembly." Installation of the pump seal assembly was completed using only attachment 2 to the procedure (a schematic drawing of the seal assembly) in violation of PMI 2010 which requires that the entire procedure be present at the job site. In addition, due to procedural discrepancies as to the exact number of





seal rings to be reinstalled, the wrong numbers were used (one seal ring was reinstalled versus the required three). This error was subsequently corrected when it was discovered during post-maintenance testing of the pump.

#### Corrective Action Taken and Results Achieved

Once the leakage at the seals had been identified, Maintenance personnel again worked on the Unit 2 north safety injection pump. The referenced procedure was utilized as required and the repairs were completed and post-maintenance testing done with satisfactory results.

#### Corrective Action Taken to Avoid Further Violation

A written management directive was initiated to the mechanic and his supervisor, outlining the nature of the procedural violation, its impact, and specific guidelines for avoiding similar situations in the future. The involved procedure has been rewritten eliminating discrepancies in text, drawings and parts lists, and is now available for use by Maintenance personnel. The Maintenance Superintendent undertook meetings with all department personnel to outline the requirements for procedural compliance. Meetings incorporated previously initiated policies from plant and corporate management.

#### Date When Full Compliance Will Be Achieved

Letters of instruction were given to the personnel involved on December 19, 1990. Procedure \*\*12MHP 5021.008.001 was revised to eliminate discrepancies on October 25, 1990.

#### Response to Violation Parts b. and c.

As stated in the Notice of Violation, repairs to the PORVs had been accomplished without a specific plant procedure. Successful repairs were ultimately made on both valves in accordance with plant procedure PMI-2290 (Job Orders). As permitted by PMI-2290, job order packages included repair plans (vs. procedure) which thoroughly outlined details needed to perform the work correctly. It was not intended that the use of the plan take on the appearance of being an approved plant procedure. We believe that the use of a detailed repair plan instead of an approved plant procedure was appropriate for the maintenance activities in question and was consistent with PMI-2290. We recognize, however, that there is room for interpretation as to when work may be performed on the basis of "skill of the trade" without the use of approved procedures. As a result, the use of repair plans has been suspended until planned corrective actions can be completed. A procedure was subsequently developed for repairs to these types of valves, which was taken directly from the repair plan and contained no changes in content.



Corrective Action Taken and Results Achieved

In both valve repair evolutions, Job Orders were initiated which included repair plans specific to the task. The plant's instruction (PMI-2290) was complied with and both valves were repaired and tested for operability with satisfactory results.

Corrective Action Taken to Avoid Further Violation

The use of repair plans has been suspended. In an effort to more clearly define what types of maintenance activities require approved procedures for performance, we will review work control methods in place at other facilities which have been identified as successful by the industry and the Commission. The information acquired from our review will be incorporated into a proposed standard which we will discuss with your staff at a meeting on or before June 1, 1991. If the proposed standard is acceptable, an implementation schedule will be established.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on December 19, 1990, with the suspension of the use of maintenance plans.

