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SUBJECT: Responds to NRC 910516 ltr re violations noted in Insp Rept
 50-315/91-10 on 910320-0430. Corrective actions: guide to
 enhance detail in planning process currently in development
 & leakage of valve 1-CS-536 corrected on 910421.

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DCD =



AEP:NRC:1148A

Donald C. Cook Nuclear Plant Unit 1
Docket No. 50-315
License No. DPR-58
NRC INSPECTION REPORT NO. 50-315/91010 (DRP);
RESPONSE TO NOTICE OF VIOLATION

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

Attn: A. B. Davis

June 17, 1991

Dear Mr. Davis:

This letter is in response to Mr. B. Clayton's letter dated May 16, 1991, which forwarded the report on the routine safety inspection conducted by members of your staff from March 20 through April 30, 1991 of activities at Cook Nuclear Plant Unit 1. The Notice of Violation attached to Mr. Clayton's letter identified one Severity Level IV violation associated with an inadequacy in the post-maintenance testing performed after repairs to a Unit 1 chemical and volume control system crosstie valve had been completed. Our response to the Notice of Violation is provided 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,

A handwritten signature in cursive script, appearing to read "E. E. Fitzpatrick".

E. E. Fitzpatrick,
Vice President

EEF/eh

Attachment

9107240085 910717
PDR ADOCK 05000315
Q PDR

11-18 PM

IE01

Mr. A. B. Davis

-2-

AEP:NRC:1148A

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

ATTACHMENT TO AEP:NRC:1148A
RESPONSE TO NOTICE OF VIOLATION



NRC VIOLATION:

"10 CFR 50, Appendix B, Criterion XI, as implemented by the D. C. Cook Updated Quality Assurance Program Description, Section 1.17.11 (Test Control), requires that post-maintenance test prerequisites be specified in test procedures and in the post-maintenance tests that are performed in accordance with established programs to demonstrate that structures, systems and components will perform satisfactorily in service.

Contrary to the above, on December 21, 1991 [sic], inadequate post-maintenance testing was performed on the Unit 1 Chemical and Volume Control System Crosstie Valve 1-CS-536, in that a necessary post-maintenance test prerequisite, to pressurize the body-to-bonnet region and verify Code pressure boundary integrity, during valve cycling, was not accomplished.

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

RESPONSE TO VIOLATION:

On December 21, 1990, following completion of maintenance activity on Unit 1 CVCS crosstie valve (1CS-536) post maintenance tests (PMT) were initiated which subsequently proved to be inadequate. The maintenance activity was performed to correct seat leakage. Post maintenance testing that was performed verified the valve could be opened and closed and that seat leakage was acceptable. The testing did not verify the body-to-bonnet joint was leak tight.

The PMT that had been identified during the planning stage for the work was inadequate in that it did not identify all testing required to verify proper performance of the maintenance activity had been accomplished (seat leakage, mechanical joint/packing leakage and ability to operate the valve).

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The leakage of 1-CS-536 was corrected on April 21, 1991, in conjunction with a transformer outage utilizing a specially developed procedure and detailed PMT instructions. Post maintenance testing was performed with the system at normal operating pressure and included checks for leakage at the seat and mechanical joint/packing area. The valve was also cycled with satisfactory results.

CORRECTIVE ACTION TAKEN TO PREVENT FUTURE VIOLATIONS

The planning group within the Maintenance Department reviewed the specific circumstances of the event. They developed enhanced review requirements for job orders to better identify those instances when additional PMT information is required.

A guide to enhance the detail in the planning process is currently in development. It will include all measures presently in the planning process and additional enhancements identified during the review of the guide. Whenever appropriate, specifics will include unique component design configuration and system operating parameters. The additional enhancement of the computerized Nuclear Plant Maintenance (NPM) system will be utilized by job order planners for detailed PMT activities by July 31, 1991. The computerization will allow specific PMT task assignments as part of job order planning as well as providing additional assurance that needed reviews or actions will prevent future violations.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

A review of the operating experience with job order planners was completed June 11, 1991. A job order planning guide and implementation of the Nuclear Plant Maintenance system will further enhance our ability to properly conduct post maintenance testing. This effort will be completed by July 31, 1991.