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 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316  
 AUTH. NAME AUTHOR AFFILIATION  
 FITZPATRICK, E. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele  
 RECIP. NAME RECIPIENT AFFILIATION  
 DAVIS, A.B. Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 911008 ltr re violations noted in Insp Repts  
 50-315/91-24 & 50-316/91-24 on 910916-19. Corrective actions:  
 all workers now required to exit via containment access  
 control bldg.

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AEP:NRC:1148E

Donald C. Cook Nuclear Plant Units 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
NRC INSPECTION REPORT NOS. 50-315/91024 (DRSS)  
AND 50-316/91024 (DRSS); RESPONSE TO NOTICE OF  
VIOLATION

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

Attn: A. B. Davis

November 7, 1991

Dear Mr. Davis:

This letter is in response to Mr. L. R. Greger's letter dated October 8, 1991, which forwarded the report on the routine safety inspection conducted by members of your staff from September 16 through September 19, 1991, of activities at the Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Greger's letter identified one Severity Level IV violation associated with a condition in which personnel failed to follow proper radiation protection procedures after alarming a personnel contamination monitor. 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,

E. E. Fitzpatrick  
Vice President

ldp

Attachment

IE06

Mr. A. B. Davis

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AEP:NRC:1148E

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:1148E

Response to Notice of Violation

## NRC Violation:

"Technical Specification 6.8.1.a requires adherence to the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, February 1978. Section 7.e.4 and 7 of Appendix A require procedures for contamination control and personnel monitoring. Procedure 12 PMP 6010 RPP.300, "Contamination Control Program", Section 5.4, requires notification to Radiation Protection in the event of a personnel monitor alarm.

Contrary to the above, on September 18, 1991, during an inspection tour of the Radiation Control Area, an inspector observed three workers alarm personnel contamination monitors without notifying Radiation Protection as required by procedures.

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

## Response to Violation:

During NRC inspector facility tours it was observed that three individuals alarmed the personnel contamination monitors (PCMs) at the turbine building exit. No RP personnel were in the immediate area at the time to acknowledge the monitor alarms and, rather than requesting assistance from RP, the workers proceeded to attempt decontamination. After successfully completing self-decontamination, they exited the controlled area. This action was not in compliance with plant procedure 12 PMP 6010 RPP.300, "Contamination Control Program".

Our evaluation of this event found that the multiple exits (turbine building exit and containment access control) which exist from the restricted area resulted in difficulty providing sufficient RP coverage in this area. Radiation Protection coverage and oversight at the access-egress points encourages contamination program procedure compliance.

(1) Corrective Actions Taken and Results Achieved

On September 23, 1991, the ability to exit the auxiliary building via the turbine exit was revoked for all personnel (with the exception of Chemistry personnel working in the immediate vicinity). All workers are now required to exit via the containment access control building. This provides the necessary RP coverage in the area to ensure compliance with the Contamination Control Program.

Access and egress via the turbine building may be reinstated during periods of high activity (unit outages), or unusual conditions, provided necessary RP coverage in the area is maintained.

(2) : Corrective Action Taken to Avoid Future Violations

The corrective actions detailed in No. 1 above are considered adequate to minimize the potential for future violations.

(3) Date When Full Compliance will be Achieved

Full compliance was achieved on September 23, 1991 when the egress points were limited to ensure adequate RP oversight/coverage of these areas.