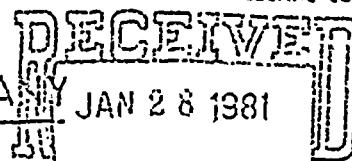


INDIANA & MICHIGAN ELECTRIC CO.

INDIANA & MICHIGAN ELECTRIC COMPANY



P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

January 23, 1981
AEP:NRC:00512

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
IE Inspection Report Nos. 50-315/80-15; 50-316/80-14

Mr. James G. Keppler, Regional Director
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region III
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter is our response to the Notice of Violation attached as Appendix 'A' to Mr. R. F. Heishman's letter of January 2, 1981. In accordance with Appendix 'A' to Mr. Heishman's letter this response is being submitted under oath and affirmation.

On July 28, 1980, while Unit No. 2 was operating in Mode 1, the nitrogen cover pressure on one of the four accumulator tanks exceeded the upper limit of 644 psig specified in Technical Specification 3.5.1.d. for approximately ten minutes. The maximum pressure experienced was 650 psig. This event was in fact the result of the failure of the high/low pressure alarm to clear during operator action to increase cover gas pressure. The transient nature of this event and the magnitude of the pressure excursion (+6 psi) coupled with the normal accuracy of the pressure monitor (± 14 psi) and the apparent lack of adverse safety significance led to the Plant Staff's request that personnel from American Electric Power Service Corporation (AEPSC) investigate the reportability of the event.

The results of the AEPSC review indicated that there was no reasonable adverse safety implications associated with the subject event. It was recognized that the apparent nitrogen overpressure did constitute entry into the 'Action Statement' of Specification 3.5.1.d., however, the reviewers felt that the reporting criteria of Specification 6.9.1.9.b, "...operation

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ATTACHMENT TO LER NO. 80-039/03L-0

SUPPLEMENT TO CAUSE DESCRIPTION

1. Investigation into this event determined that the cause can be attributed to several factors:
 1. The normal procedure the operator uses when restoring the accumulator pressure is to use the annunciator alarm that is received when the low pressure condition clears as a notification to shut off the nitrogen supply. The annunciator used for this alarm is a common high/low pressure alarm. The alarm did not clear due to a drift in the setpoint for the high pressure alarm bistable which energized this bistable prior to the low pressure alarm bistable clearing. Failure of this alarm/bistable contributed to the nitrogen pressure exceeding the high pressure limit; Cause Code E - Component Failure.
 2. A second contributing cause was the fact that the pressure indicator used for reading the accumulator has a very wide range, 0-700 psig. This, coupled with an approximate 2% gauge accuracy, (+ 14 psi), makes it very difficult to read the gauge accurately; Cause Code B - Design.
 3. Also contributing to the apparent overpressure condition was operator failure to pay close attention to the operation at hand, thus permitting the indicated pressure to exceed the high pressure limit; Cause Code A - Personnel Error.

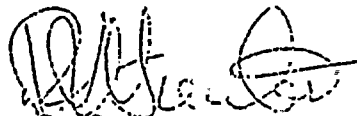
The following corrective actions have been taken:

1. The overpressure condition was corrected within approximately 10 minutes.
2. The alarm bistable was re-calibrated to the proper setpoint.
3. A design change has been initiated to correct the indicator and alarm problems.

in a degraded mode...", had not been fulfilled as the apparent cover gas overpressure did not impair the ability of the affected accumulator to perform its safety function. The AEPSC response to the Plant Staff's request failed to provide clear guidance as to the reportability of the subject event.

Effective corrective action by the operator(s) returned the accumulator cover gas pressure to within the limits of Specification 3.5.1.d. in approximately ten minutes; well within the time period of one hour allowed by the 'Action Statement' of the Specification. The reportability of this event has been discussed with those members of the AEPSC staff involved with the aforementioned review. Particular emphasis was placed on the need for the AEPSC office to provide clear and concise guidance to the Plant Staff in matters such as the one discussed herein. These actions should be sufficient to prevent reoccurrence of similar events.

Very truly yours,



R. S. Hunter
Vice President

cc: John E. Dolan
R. C. Callen
G. Charnoff
R. W. Jurgensen
D. V. Shaller
Region III Site Inspector

STATE OF NEW YORK)

)

COUNTY OF NEW YORK)

R. S. Hunter, being duly sworn, deposes and says he is the Vice President of Licensee Indiana and Michigan Electric Company, that he has read the foregoing response to the NRC Notice of Violation contained in IE Inspection Reports No. 50-315/80-15 and No. 50-316/80-14 and knows the contents thereof, and the said contents are true to the best of his knowledge and belief.

R. S. Hunter

Subscribed and sworn to before me this 23rd day of January, 1981

Gregory M. Ginn

Notary Public

GREGORY M. GINN
Notary Public, State of New York
No. 31-4843431
Qualified in New York County
Commission Expires March 29, 1981.

