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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
 MARTIN,J.B. Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 930809 ltr re violations noted in insp repts
 50-315/93-15 & 50-316/93-15 on 930607-18. Corrective actions:
 changed maint head instruction to allow use of job order
 completion date for scheduling next PM task.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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



AEP:NRC:1184E
10 CFR 2.201

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 REPORTS NO. 50-315/93015 (DRS)
AND 50-316/93015 (DRS)
REPLY TO NOTICE OF VIOLATION

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

Attn: Mr. J. B. Martin

September 7, 1993

Dear Mr. Martin:

This letter is in response to your letter dated August 9, 1993, which forwarded a Notice of Violation. The Notice of Violation resulted from a routine, announced inspection of maintenance activities conducted by H. A. Walker, M. K. Khanna, W. D. Pegg, and D. L. Schrum on June 7 through 18, 1993. The violations are associated with inadequate procedures and procedure compliance, inadequate document control, and failure to adequately maintain safe shutdown lighting.

Our reply to the Notice of Violation is provided in the attachment to this letter.

This letter is submitted pursuant to 10 CFR 50.54(f) and, as such, an oath statement is enclosed.

Sincerely,

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

E. E. Fitzpatrick
Vice President

dr

Attachment

9309140055 930907
PDR ADOCK 05000315
Q PDR



TEO/
11

Mr. J. B. Martin

-2-

AEP:NRC:1184E

cc: A. A. Blind - Bridgman
G. Charnoff
T. E. Murley, NRC - Washington, D.C.
NRC Resident Inspector
NFEM Section Chief
J. R. Padgett

STATE OF OHIO)
COUNTY OF FRANKLIN)

E. E. Fitzpatrick, begin duly sworn, deposes and says that he is the Vice President of licensee Indiana Michigan Power Company, that he has read the forgoing response to NRC INSPECTION REPORTS NO. 50-315/93015 (DRS) AND 50-316/93015 (DRS) and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

E E Fitzpatrick

Subscribed and sworn to before me this 8th
day of September, 19 93.

[Signature]

NOTARY PUBLIC

Commission expires 3-9-96

ATTACHMENT TO AEP:NRC:1184E

REPLY TO NOTICE OF VIOLATION

Background

A routine, announced inspection of maintenance activities using selected portions of NRC inspection module 62700 to ascertain whether maintenance was effectively accomplished and assessed by the Donald C. Cook Nuclear Plant was conducted by Messrs. H. A. Walker, M. K. Khanna, W. D. Pegg, and D. L. Schrum from July 7 to 18, 1993.

During this inspection, three items were found to be in violation. The violations were identified with:

- (1) inadequate procedures and procedure compliance (a discrepancy was identified between a procedure, MHI-5030, and the method of how the work was actually performed; explicitly, the procedure required that the interval for performing periodic preventive maintenance tasks be based on the date the task was last performed; however, the preventive maintenance task program is configured to set this interval based on the date when the maintenance work package was closed rather than the date the preventive maintenance task was last performed);
- (2) inadequate document control (out of date maintenance head instruction procedures and indices were found to be in use in the Safety and Assessment library); and
- (3) failure to adequately maintain safe shutdown lighting (approximately a dozen emergency battery lights out of 221 were found to be aimed incorrectly or otherwise not functional).

These violations were set forth in a letter containing the notice of violation dated August 9, 1993 from Mr. Geoffrey C. Wright, Chief, Engineering Branch. The letter was received August 11, 1993. Our response to the notice of violation is contained within this document.

NRC Violation I

"10 CFR 50, Appendix B, Criterion V states that activities affecting quality shall be prescribed by documented instructions or procedures, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions or procedures.

Procedure MHI-5030, "Preventive Maintenance Program", Revision 13, with change sheets 1 through 5, paragraphs 4.13 and 6.3.2.A, required that the interval for performing periodic preventive maintenance tasks be based on the date the task was last performed.

Contrary to the above, from January 1993 to June 9, 1993, preventive maintenance task intervals were based on the date when the maintenance work package was closed rather than the date the preventive maintenance task was last performed.

This is a Severity Level IV violation."

Response to Violation I

1. Admission or Denial of the Alleged Violation

Indiana Michigan Power admits to the violation as cited in the NRC Notice of Violation.

2. Reasons for the Violation

Starting in January, 1993, preventive maintenance (PM) tasks have been scheduled via use of a computerized work control system. Under this system, PM tasks are automatically rescheduled based on the date the associated job order is administratively closed, not the date the PM activity is completed.

Normally, the job order close-out date is very close to the PM activity completion date. However, jobs requiring significant restoration activities, such as installation of insulation or removal of scaffolding, can delay close-out of the job order, and thus, the rescheduling of the PM tasks. This has the undesired effect of extending the period between consecutive PM tasks beyond the period established by the PM program.



The plant staff was aware of the rescheduling problem, but at the time of the inspection had not yet identified an effective solution. Furthermore, the problem was not recognized as a procedural violation, and, therefore, it had not been reported via the plant's corrective action reporting system.

The PM tasks affected by this rescheduling problem did not involve any Technical Specification surveillance tests, nor were they considered mandatory for the continued operability of safety-related equipment.

3. Corrective Actions Taken and Results Achieved

The maintenance head instruction (MHI-5030) has been changed to allow the use of the job order completion date for scheduling of the next PM task.

The change to MHI-5030 allows the task interval to be based on the date the work package is closed, and brings the scheduling process in full compliance with the procedure requirements.

4. Corrective Actions Taken to Avoid Further Violations

Additional guidance will be provided to plant personnel involved in the scheduling and tracking of PM task job order activities, emphasizing the importance of completing PM task support activities and reporting their status in a timely manner. This guidance will be issued by September 24, 1993.

Software enhancements that will allow rescheduling based on the date that the PM task activity is performed rather than using the job order closeout date will be pursued. Until these enhancements are obtained, a periodic review will be performed of open PM task job orders to identify those PM task activities that have been open for an excessive amount of time.

5. Date When Full Compliance will be Achieved

Full compliance was achieved with the change to MHI-5030, Revision 13, Change Sheet 7, on August 30, 1993.

NRC Violation II

"10 CFR Part 50, Appendix B, Criterion VI states that measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed.

Contrary to the above, from 1990 to June 16, 1993, approved changes to maintenance head instructions were not distributed to the safety and assessment satellite library, which was used by licensee personnel to obtain work related instructions.

This is a Severity Level IV violation."

Response to Violation II**1. Admission or Denial of the Alleged Violation**

Indiana Michigan Power admits to the violation as cited in the NRC Notice of Violation.

2. Reasons for the Violation

In 1990, the Safety and Assessment (S&A) library was removed from distribution of the MHI series procedures. The S&A library continued to receive updates to the MHP and IHP series procedures. At the time that the MHI series procedures were removed from distribution for the S&A library, Maintenance Department did not verify that the existing MHI series procedures in the S&A library were returned or destroyed. This accounts for why the MHI series procedures were out of date in the S&A library.

In late 1992, the Maintenance Department reissued their department procedure indices for the MHI, MHP, and IHP series procedures to the plant including to the S&A library. This accounts for why the information on the Maintenance Department indices in the S&A library does not match the version of the MHI series procedures contained in the S&A library.

3. Corrective Actions Taken and Results Achieved

On June 24, 1993, the S&A library was placed back on the distribution list for the MHI series procedures. The outdated set of MHI series procedures was removed from the S&A library and a current set of the MHI series procedures and associated index were placed in the S&A library.

4. Corrective Actions Taken to Avoid Further Violations

A review is being conducted of the S&A library to identify and correct any other procedure errors of this type. This review will be completed by October 29, 1993.

On July 29, 1993 a letter was issued to department heads sensitizing them to this event. The letter also explained the document control requirements that should have prevented this event.

On August 31, 1993, PMI-2030, Plant Manager Instruction on Document Control, was revised to clearly state the document control requirements.

5. Date When Full Compliance will be Achieved

Full compliance was achieved June 24, 1993 when the S&A library was placed back on the distribution list for the MHI series procedures, the outdated set of MHIs removed and the updated set added.



NRC Violation III

"10 CFR Part 50, Appendix R, Section III.J states that emergency lighting units with at least an 8-hour battery power supply shall be provided in all areas needed for operation of safety shutdown equipment and in access and egress routes thereto.

Contrary to the above, from January 1993 to June 15, 1993, emergency lighting was not provided in all areas needed for operation of safe shutdown equipment and in access and egress routes thereto due to conditions that existed on a number of emergency lighting units that rendered the units inoperable.

This is a Severity Level IV violation."

Response to Violation III

1. Admission or Denial of the Alleged Violation

Indiana Michigan Power admits to the violation as cited in the NRC Notice of Violation.

2. Reasons for the Violation

The cause of the inoperability of a number of emergency lighting units was the deferral of the Preventive Maintenance (PM) for the emergency battery lights.

3. Corrective Actions Taken and Results Achieved

During the time period of the NRC inspection, a corrective maintenance action request (Action Request No. 46622) was generated to verify that all Appendix R emergency battery lights were properly aimed and functional. This action request was generated on June 10, 1993 and completed on June 14, 1993. All emergency battery lights were properly aimed and corrective maintenance action requests were written for eight emergency battery lights which were found not to be functional. The eight non-functional emergency battery lights were restored to functional status by July 20, 1993.



In June 1993, drawdown testing started and remains in progress.

4. Corrective Actions Taken to Avoid Further Violations

In order to ensure that further violations are avoided, two preventive actions have been taken. A comprehensive emergency battery light program has been developed. This program includes:

- 1) The development of an emergency battery light program manual;
- 2) Revision of the preventive maintenance task from a data sheet into a new, stand alone procedure (**12 IHP 5030.EMP.010, "Emergency Battery Light Units"); and
- 3) The assignment of a cognizant technical lead to oversee the program.

The program manual delineates the roles and responsibilities of personnel involved in the program, data collection, maintenance of information collected, testing frequency, battery and lamp replacement requirements, definition of failures of units, condition report requirements, procurement of and maintenance of spare batteries, and change process for the program manual.

The new procedure provides the mechanism to perform and properly document emergency battery light maintenance and discrepancies.

The second preventive action has also been established. MHI-5030, "Preventive Maintenance Program", which is the parent document for the preventive maintenance program, has been revised such that deferral requests must be submitted prior to the due date of the surveillance and it must be reviewed and approved by the Plant Engineering Department Superintendent. Plant Engineering Department has recently assumed ownership of the program and is now required to review and approve deferrals.



5. Date When Full Compliance will be Achieved

The corrective action of verifying the correct aiming and functionality of battery lights was completed on July 20, 1993. Drawdown testing is in progress and will be completed by January 30, 1994. Therefore, full compliance will be achieved on January 30, 1994.

