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 RECIP. NAME RECIPIENT AFFILIATION
 MARTIN, J. B. Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 930809 ltr re violation noted in repts
 50-315/93-15 & 50-316/93-15 on 930607-18. Corrective actions:
 changed maint head instruction.

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AEP:NRC:1184E1
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)
REVISED REPLY TO NOTICE OF VIOLATION

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

Attn: Mr. J. B. Martin

November 24, 1993

Dear Mr. Martin:

This letter is in response to a verbal request from H. A. Walker of the NRC Region III staff to G. A. Weber with regard to our response (AEP:NRC:1184E, dated September 7, 1993) 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. Mr. Walker's verbal request was with regard to the response provided for Violation I associated with inadequate procedures and procedure compliance.

Our response was perceived as having forced the procedure to comply with our practice, and continuing to allow the actual interval between consecutive performances of a given preventive maintenance task to be extended beyond the required interval. This was not our intention. With the intention of addressing Mr. Walker's request, our revised reply to Violation I in 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 attached.

Sincerely,

E. E. Fitzpatrick
Vice President

9312020446 931124
PDR ADDCK 05000315
Q PDR

Mr. J. B. Martin

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AEP:NRC:1184E1

dr

Attachment

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

Mr. J. B. Martin

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AEP:NRC:1184E1

bc: P. A. Barrett
S. J. Brewer
D. H. Malin/K. J. Toth
M. L. Horvath - Bridgman - w/o attachment
J. B. Shinnock - w/o attachment
W. G. Smith, Jr./S. H. Steinhart
B. A. Wetzel, NRC - Washington, D.C.
AEP:NRC:1184E1
DC-N-6015.1

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 revision to the 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 24th
day of November, 19 93.

Dorothy O. Grossman
NOTARY PUBLIC

DOROTHY O. GROSSMAN
NOTARY PUBLIC - STATE OF OHIO
MY COMMISSION EXPIRES 11/21/97

ATTACHMENT TO AEP:NRC:1184E1

REVISION TO VIOLATION I IN
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 in the attachment to our letter AEP:NRC:1184E, dated September 7, 1993.

Mr. H. A. Walker contacted G. A. Weber, Superintendent, Plant Engineering at Cook Nuclear Plant, to identify his concerns with our response to Violation I in the above letter. Our response was perceived as having forced the procedure to comply with our practice, and continuing to allow the actual interval between consecutive performances of a given preventive maintenance task to be extended beyond the required interval. This was not our intention.

With the intention of addressing Mr. Walker's request, our revised reply to Violation I in the Notice of Violation is provided in the remainder of this attachment.



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

To address the immediate short-term issue of procedural non-compliance, 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. This 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.

To ensure that the task interval will not be extended in situations where restoration activities and administrative closeout of the job order do not occur promptly following completion of the PM task itself, modifications to the work control system software have also been completed. These changes will allow preventive maintenance specialists to overwrite the computer generated PM task "next required date". PM specialists will monitor the status of open PM job orders to identify those jobs which will require this action to be taken.

A memo has been issued to the plant staff reinforcing the importance of timely completion of restoration and closeout activities.

4. Corrective Actions Taken to Avoid Further Violations

Plant Manager Instructions and Procedures (PMI-5030 and PMP 5030.001.003) have been issued to improve the overall structure of the PM program and assignment of responsibilities.

PM tasks which are scheduled to be performed during non-outage periods are currently in the process of being realigned with their associated Functional Equipment Group (FEG) so that their due dates will coincide with the start of the week the FEG is scheduled to be worked. (All plant FEGs are scheduled on a 12-week rolling schedule.) The manner in which the software sets the next required date is also being modified such that the "next required date" will remain in alignment with the appropriate future FEG work date. When this realignment process is complete, the "next required date"

calculation will be totally independent of job restoration and closeout activities, thereby eliminating the need for close monitoring of open job order status and manual intervention to correct PM task intervals.

Additional software changes are under study to more efficiently handle those PM tasks that are not FEG based.

5. Date When Full Compliance will be Achieved

Full compliance was achieved with the issuance of Change Sheet 7 to MHI-5030, Revision 13, and the modifications to the work control system software, both of which were completed prior to or on September 16, 1993.

