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

SUBJECT: Responds to NRC 931228 ltr re violations noted in insp repts
 50-315/93-20 & 50-316/93-20. Corrective actions: accelerated
 testing schedule initiated re valve stroke time.

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AEP:NRC:1184I
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. 50-315/93020 (DRP)
AND 50-316/93020 (DRP)
REPLY TO NOTICE OF VIOLATION

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

Attn: Mr. J. B. Martin

January 27, 1994

Dear Mr. Martin:

This letter is in response to an NRC letter, dated December 28, 1993, which forwarded a Notice of Violation to Indiana Michigan Power Company. The Notice of Violation resulted from a routine safety inspection conducted by J. A. Isom, D. J. Hartland, and G. M. Nejfelt at Donald C. Cook Nuclear Plant from October 20 through December 7, 1993. Two violations were cited. One violation is associated with failure to take immediate action to declare the Unit 2 turbine-driven auxiliary feedwater pump inoperable and to initiate actions to correct the deficient condition of the turbine-driven auxiliary feedwater pump trip and throttle valve during routine testing on September 2, 1993. The other violation is associated with design control of the replacement of pilot operated valves in the emergency diesel generator air start systems.

Our reply to the Notice of Violation is provided in the attachment to this letter. Per direction in the December 28, 1993, letter, a response is provided only for turbine-driven auxiliary feedwater pump trip and throttle valve issue.

Handwritten signature/initials



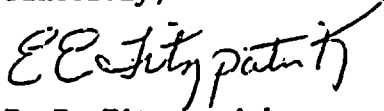
Mr. J. B. Martin

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AEP:NRC:1184I

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

dr

Attachment

cc: A. A. Blind
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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bc: S. J. Brewer
D. H. Malin/K. J. Toth
M. L. Horvath - Bridgman - w/o attachment
J. B. Shinnock - w/o attachment
J. B. Hickman, NRC - Washington, D.C.
AEP:NRC:1184I
DC-N-6015.1 - w/o attachment

STATE OF OHIO)
COUNTY OF FRANKLIN)

E. E. Fitzpatrick, being 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. 50-315/93020 (DRP) AND 50-316/93020 (DRP) 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 27th
day of January, 19 94.

Rita D. Hill
NOTARY PUBLIC

RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-28-94

ATTACHMENT TO AEP:NRC:1184I

REPLY TO NOTICE OF VIOLATION

Background

A routine safety inspection was conducted by J. A. Isom, D. J. Hartland, and G. M. Nejfelt at Donald C. Cook Nuclear Plant from October 20 through December 7, 1993.

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

- (1) failure to take immediate action to declare the Unit 2 turbine-driven auxiliary feedwater pump (TDAFP) inoperable and to initiate actions to correct the deficient condition of the turbine-driven auxiliary feedwater pump trip and throttle valve during routine testing on September 2, 1993; and
- (2) failure to identify during the design change review that replacement pilot operated valves in the emergency diesel generator air start systems from another manufacturer were not suitable for that application.

These violations were set forth in a letter containing the notice of violation dated December 28, 1993, from Mr. B. L. Jorgensen, Acting Chief, Reactor Projects Branch 2. The letter was received January 6, 1994. Our response to the notice of violation is contained within this document.

Per direction in the notice of violation cover letter, no response is provided for the second violation.

NRC Violation

"Section 4.0.5 of the Unit 2 Technical Specification (TS) requires that the licensee implement surveillance requirements for in-service inspection and testing of ASME Code Class 1, 2 and 3 components in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and the applicable Addenda as required by 10 CFR 50, Section 50.55a(g).

Paragraph (b) of Subsection IWV-3417, which is the code subsection for in-service testing of valves, requires that for a valve which fails to exhibit the required change of valve stem or disk position or which exceeds its specified limiting time value of full stroke by this testing, corrective action shall be initiated immediately. If the condition is not, or cannot be, corrected within 24 hours, the valve shall be declared inoperative.

Contrary to the above, on September 2, 1993, the Unit 2 trip and throttle valve for the turbine-driven auxiliary feedwater pump failed to exhibit the required change of valve position during testing, but the condition was not corrected, nor was the valve declared inoperative within 24 hours.

This is a Severity Level IV violation."

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

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

2. Reasons for the Violation

The TDAFP trip and throttle valve was not considered to be inoperative as a result of the first switch actuation, as the first attempt was believed to be invalid by the operators because the switch had not been held in the open position for a sufficient length of time. The operators had become conditioned to the "need" to hold the control switch in the open position longer for this valve than for other valves based on their understanding of the control circuit.

When the control switch was actuated the second time, the valve stroke time marginally exceeded the acceptance criteria of 20 seconds. The valve was declared inoperable, and was successfully retested shortly thereafter, under the guidance of Operations Standing Order #74 (OSO #74). A Condition Report was generated to investigate the slow valve stroke time as required by our corrective action system.

OSO #74, which provides information pertaining to In-service Testing, allowed a retest of a valve if the first stroke time was out of specification. Since the initial attempt to open the valve was considered invalid, the above sequence was considered to be in accordance with the guidance provided in OSO #74. However, OSO #74 did not provide guidance to the operators as to what constitutes a valid test.

3. Corrective Actions Taken and Results Achieved

Because the valve stroke time did not meet the acceptance criteria, an accelerated testing schedule was initiated.

OSO #74 was revised to provide specific guidance on testing of the turbine-driven auxiliary feedwater pump trip and throttle valve. The changes to OSO #74 require the TDAFP to be declared inoperable if the trip and throttle valve fails to meet the required stroke time on the first attempt and states that the valve shall not be declared operable until the first valve test failure has been resolved.

4. Corrective Actions Taken to Avoid Further Violations

To further enhance OSO #74, additional information will be provided to the operators as to what constitutes a valid test for stroke timing of valves.

The contactor assembly for the trip and throttle valve was replaced and operators are now aware that the valve should stroke without the control switch being held to the open position for an extended period of time.

5. Date When Full Compliance Will Be Achieved

The revision to OSO #74 will be completed by January 31, 1994. With the revision to the standing order, full compliance will be achieved.

