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 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 violations noted in insp repts 50-315/94-06 &
 50-316/94-06. Corrective actions: Procedure
 12 THP 6010 RPP. 606 revised to include WD-490 in valve
 lineup.

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Indiana Michigan
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Columbus, OH 43216



AEP:NRC:1212B
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. 50-315/94006 (DRSS)
AND 50-316/94006 (DRSS)
REPLY TO NOTICE OF VIOLATION

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

Attn: Mr. J. B. Martin

May 25, 1994

Dear Mr. Martin:

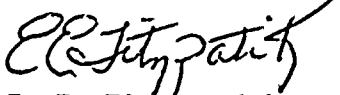
This letter is in response to a USNRC letter dated April 29, 1994, that forwarded a Notice of Violation (NOV) to Indiana Michigan Power Company. The NOV contained one violation which was self-identified by the licensee and noted during a routine radiation protection inspection conducted by Mr. C. R. Cox from March 28 through April 1, 1994. The violation is associated with the proceduralized activities that led to the spent resin spill in the 587' drumming room on March 19, 1994.

In response to the event, prompt action was taken to suspend all resin transfer activities. Corrective actions, in the form of procedure revisions, were instituted to prevent recurrence prior to resumption of such activities.

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 attached.

Sincerely,



E. E. Fitzpatrick
Vice President

dr

9406230229 940525
PDR ADDCK 05000315
Q PDR

IE-06

51.1-18

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. 50-315/94006 (DRSS) AND 50-316/94006 (DRSS), REPLY TO NOTICE OF VIOLATION 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 25th

day of May, 19 94.

Rita D. Hill
NOTARY PUBLIC

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

Mr. J. B. Martin

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AEP:NRC:1212B

Attachments

cc: A. A. Blind
G. Charnoff
NFEM Section Chief
NRC Resident Inspector - Bridgman, MI
NRC Resident Inspector - Big Rock Point Nuclear Plant
J. R. Padgett
W. T. Russell, NRC - Washington, D.C.

ATTACHMENT TO AEP:NRC:1212B

REPLY TO NOTICE OF VIOLATION

Background

A routine radiation protection inspection was conducted by Mr. C. R. Cox from March 28 through April 1, 1994.

During this inspection, one item was found to be in violation. The violation was identified as inappropriateness of procedures with regard to the activities that led to the spent resin spill in the 587 drumming room on March 19, 1994.

This violation was set forth in a letter containing the notice of violation, dated April 29, 1994, from Mr. John A. Grobe, Acting Chief, Reactors Support Programs Branch. The letter was received May 10, 1994. Our response to the notice of violation is contained within this document.

NRC Violation I

"10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality be prescribed by a procedure of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Contrary to the above:

1. On March 18, 1994, Procedure 12 THP 6010 RPP.606, "Operation of the Radioactive Waste Water Demineralizer System (RWDS)," was inappropriate to the circumstances in that the valve lineup failed to identify a valve required to be opened for the evolution to be completed successfully.
2. On March 19, 1994, Procedure 02 OHP 4021.007.002, "Reactor Coolant Demineralizer Resin Sluicing and Replacement," was inappropriate to the circumstances in that the procedure failed to identify alternative flow paths and the valves whose positions needed to be verified to prevent those alternative flow paths.

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

Response to Violation

1. Admission or Denial of the Alleged Violation

Indiana Michigan Power Company admits to the violation as cited in the NRC notice of violation.

2. Reasons for the Violation

The valve lineup for procedure 12 THP 6010 RPP.606, "Operation of the Radioactive Waste Water Demineralizer System (RWDS)," failed to identify WD-490 due to the procedure author's misinterpretation of valve information when transitioning from one flow print to another.

The author incorrectly assumed that WD-498 was identified on two prints when in fact WD-498 was on one print and WD-490 was on the other. Subsequent procedure reviews performed prior to the procedure approval failed to identify the original error.

Procedure 02 OHP 4021.007.002, "Reactor Coolant Demineralizer Resin Sluicing and Replacement," failed to identify alternative flow paths and the valves whose positions needed to be verified closed to prevent those paths from being used. This was due to the basic assumption that the subject valves are normally maintained in the closed position and, therefore, a check was not necessary.

3. Corrective Actions Taken and Results Achieved

On March 18, 1994, procedure 12 THP 6010 RPP.606, "Operation of the Radioactive Waste Water Demineralizer System (RWDS)," was revised to include WD-490 in the valve lineup.

On March 25, 1994, procedure 02 OHP 4021.007.002, "Reactor Coolant Demineralizer Resin Sluicing and Replacement," was revised to include verification of the subject alternate flow paths and the associated valves which positions needed to be verified.

4. Corrective Actions Taken to Avoid Further Violations

The procedure used by the radiation protection department for procedure preparation, review and maintenance will be revised to enhance reviews performed to ensure procedure accuracy. This revision will be completed prior to July 1, 1994.

In the cover letter to the subject notice of violation/inspection report, it was requested that our response include a review of similar evolutions that require coordination between different groups and the steps taken to improve the coordination and communications between such groups. Review and assessment of coordination and communication between different groups is an integral part of our corrective action program. Previous assessment lead to the initiation of a comprehensive improvement plan within the Chemistry Department. Similarly, a self assessment of recent events related to coordination and communication within the Operations Department has resulted in the initiation of significant changes within this department. The latest analysis of our Corrective Action Program Data Base revealed that communications remain a challenge. This information has been provided to the appropriate management personnel. We will continue to monitor performance in these areas and provide feedback relative to the effectiveness of performance improvement initiatives.

Teamwork and Communication are critical to the success of any operation and the importance of each has consistently been emphasized during State of the Plant Sessions conducted by the Vice President-Plant Manager and attended by plant and contract personnel. In addition, the AEP Nuclear Organization has initiated an integrated Team Building process. This integrated Team Building process was initiated by Senior Management and is designed to enhance teamwork, coordination and communication throughout the whole organization.

Also, the radiation protection department will review similar procedural evolutions that require coordination between different groups and will delineate within these procedures individual responsibilities for command and control of the activity from both an intradepartment and interdepartment coordination perspective. This review will be completed prior to July 1, 1994. Procedure changes required as a result of this review will be completed prior to May 1, 1995.

In addition, the operations department will review this event with the operations procedure group and will determine if changes are necessary to the current procedure development process. This review will be completed prior to July 1, 1994. Process changes required as a result of this review will be completed prior to May 1, 1995.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 25, 1994, with the revision to Procedure 02 OHP 4021.007.002, "Reactor Coolant Demineralizer Resin Sluicing and Replacement".