

# PRIORITY 1

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SUBJECT: Responds to unresolved item noted in Insp Rept 50-315/94-04  
re event on 940217 & 18 during draining of Unit 1 RCS in  
preparation for refueling. Operators re-trained on PMI-4090  
during 940328-0506 training cycle.

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AEP:NRG:1212A1  
10 CFR 2.201

Donald C. Cook Nuclear Plant Unit 1  
Docket No. 50-315  
License No. DPR-58  
NRC INSPECTION REPORT NO. 50-315/94004(DRP)  
REPLY TO REQUEST FOR WRITTEN RESPONSE TO UNRESOLVED ITEM:  
RCS DRAINDOWN OPERATOR TRAINING

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

Attn: Mr. J. B. Martin

August 9, 1994

Dear Mr. Martin:

This letter is in response to an unresolved item identified in Inspection Report 50-315/94004(DRP). The inspection report was written about an event which occurred on February 17 and 18, 1994, during draining of the Unit 1 reactor coolant system in preparation for refueling. The unresolved item (50-315/94004-03(DRP)) is regarding training operators for infrequently performed plant evolutions (in particular, the reactor coolant system draining evolution as performed via procedure \*\*1-OHP 4021.002.005.) Our response to the unresolved item is contained in the attachment to this letter.

In addition, we take this opportunity to correct an apparent misinterpretation reflected in Inspection Report 50-315/94004(DRP). The third item in a list in Section 7, Page 12, "Licensee Immediate Corrective Actions," reads:

"Administrative controls for reactor coolant system operation at 'reduced inventory' will be reviewed against lessons learned from this event and will be continuously reviewed against industry operating experience information."

The wording of the corrective action, as provided to the inspector at the exit meeting, was:

"Administrative controls governing reactor coolant system operation at 'reduced inventory' levels will be reviewed against lessons learned from the February 17-18 reactor coolant system indication/inventory event and will be rereviewed against industry operating experience information."

The intent of the corrective action was to "review again," i.e., to perform a single additional review; it was not intended to commit to continuous or multiple reviews.

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Mr. J. B. Martin

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AEP:NRC:1212A1

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

ar

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.



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 NRC Inspection Report No. 50-315/94004(DRP) REPLY TO REQUEST FOR WRITTEN RESPONSE TO UNRESOLVED ITEM: RCS DRAINDOWN OPERATOR TRAINING 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 9th

day of August, 1994.

Rita D. Hill  
NOTARY PUBLIC

RITA D. HILL  
NOTARY PUBLIC, STATE OF OHIO  
MY COMMISSION EXPIRES 6-28-99





ATTACHMENT TO AEP:NRG:1212A1

REPLY TO UNRESOLVED ITEM 50-315/94004-03



Inspection Report 50-315/94004(DRP) documents the conclusions of a special inspection performed in response to reactor level perturbations that occurred on February 17 and 18, 1994, during draining of the Unit 1 reactor coolant system. Section 5(b) of the report, entitled "Training," addresses reactor coolant system pressure, air eductor installation, reactor coolant system venting, loss of level indication, inventory draining, and the associated operator knowledge and actions. The third paragraph of this section establishes the inspectors' concern with regard to operator training and identifies the concern as an unresolved item. Although the unresolved item is worded in generic terms, it was confirmed with one of the inspectors that the unresolved item is directed at the reactor coolant system draining evolution in particular. With regard to any potential generic concerns, guidance for training of infrequently performed evolutions is provided in PMI-4090. Operators were re-trained on PMI-4090 during the March 28 to May 6, 1994, training cycle.

Operation training was scheduled to strengthen operator knowledge of the reactor coolant system draining process, the associated procedure, instrumentation and system characteristics, and the difficulties experienced during the Unit 1 reactor coolant system draining activities. A completion date of August 1, 1994, was originally scheduled to allow training of all operating crews prior to the commencement of the Unit 2 refueling outage. On April 19, 1994, however, Unit 1 was emerging from a refueling outage when a "motor differential trip" signal of reactor coolant pump #13 was received. It was determined that the Unit 1 reactor coolant system would have to be partially drained to facilitate repairs to the coolant pump. To support this activity, the planned operator training was provided ahead of schedule; between April 22 and April 27, 1994, all operating crews received this training.

The lesson plan has since been updated (Revision 1) to incorporate additional information about equipment and procedure changes, and is being presented again in operator requalification training, preparatory to the draindown evolutions in the upcoming Unit 2 refueling outage. This training is currently underway and is scheduled to be presented to all operating crews by September 9, 1994. Lesson Plan RQ-C-02P1, "Draining RCS to Half Loop," provides training on:

- (1) the August 5, 1993, RCS draining event documented in Condition Report CR-93-1267;
- (2) the February 17 and 18, 1994, RCS draining event documented in Condition Report CR-94-0281;
- (3) reactor vessel level indication, the importance of pressure interconnections, and the effect of valve operations on indicated and actual level;
- (4) steam generator tube drainage;
- (5) recent changes to the RCS draining procedure and the reasons for them; and
- (6) potential problems with alternate level indications.

We currently plan to incorporate this training in the replacement training program for new licensed operators.

