

PRIORITY 1
(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9408240071 DOC. DATE: 94/08/19 NOTARIZED: YES DOCKET #
FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
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
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 940720 ltr re violations noted in insp rept
50-315/94-13 & 50-316/94-13. Corrective actions: work control
process code was changed on 2-MM0-240 repair job order &
PMI-7030 will be revised to redefine rework.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 8
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD3-1 PD	1 1	HICKMAN, J	1 1
INTERNAL:	AEOD/DEIB	1 1	AEOD/SPD/RAB	1 1
	AEOD/SPD/RRAB	1 1	AEOD/TTC	1 1
	DEDRO	1 1	NRR/DORS/OEAB	1 1
	NRR/DRCH/HHFB	1 1	NRR/PMAS/IRCB-E	1 1
	NUDOCS-ABSTRACT	1 1	OE DIR	1 1
	OGC/HDS2	1 1	REG FILE 02	1 1
	RES/HFB	1 1	RGN3 FILE 01	1 1
EXTERNAL:	EG&G/BRYCE, J. H.	1 1	NOAC	1 1
	NRC PDR	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL
DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM
DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 19 ENCL 19

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



AEP:NRC:1212G
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. 50-315/94013 (DRP)
AND 50-316/94013 (DRP)
REPLY TO NOTICE OF VIOLATION

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

Attn: Mr. J. B. Martin

August 19, 1994

Dear Mr. Martin:

This letter is in response to a USNRC letter dated July 20, 1994, that forwarded a notice of violation to Indiana Michigan Power Company. The notice of violation contained one violation identified during a routine safety inspection conducted by Messrs. J. A. Isom, D. J. Hartland, and D. L. Shepard from June 4, 1994, through July 1, 1994. The violation is associated with the repeated packing failures of a Unit 2 main steam test selector valve over a period of two years that resulted in several entries into four-hour limiting conditions of operation.

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,

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

E. E. Fitzpatrick
Vice President

ar

Attachment

9408240071 940819
PDR ADOCK 05000315
PDR

IE01
111

Mr. J. B. Martin

-2-

AEP:NRC:1212G

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

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 foregoing response to NRC INSPECTION REPORTS NO. 50-315/94013 (DRP) AND 50-316/94013 (DRP), 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 18th
day of August, 19 94.

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

ATTACHMENT TO AEP:NRC:1212G

REPLY TO NOTICE OF VIOLATION

Background

A routine safety inspection was conducted by Messrs. James A. Isom, David J. Hartland, and Douglas L. Shepard from June 4, 1994, through July 1, 1994.

During this inspection, one item was found to be in violation. The violation was identified as the failure to correct the root cause for the repeated packing failures of a Unit 2 main steam test selector valve over a period of two years that resulted in several entries into four-hour limiting conditions of operation.

This violation was set forth in a letter containing the notice of violation, dated July 20, 1994, from Mr. E. G. Greenman, Director, Division of Reactor Projects, USNRC, Region III. The letter was received July 25, 1994. Our response to the notice of violation is contained within this document.

NRC Violation

"10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," requires in part that "Measures shall be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Contrary to the above, as of July 1, 1994, the licensee failed to replace the pitted valve stem on main steam stop valve (MSSV) dump valve test selector, 2-MMO-240, a significant condition adverse to quality. Specifically, Action Request 25594 had been written on July 8, 1992, to replace the pitted valve stem but was not scheduled to be performed until the refueling outage starting in September 1994. Consequently, 2-MMO-240 had to be repacked five times, requiring entries into the four hour Limiting Condition of Operation (LCO), as required by Technical Specification (TS) 4.7.1.5.1. There were several opportunities since July 1992 to replace the stem without entering the LCO.

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 root cause for this violation has been identified as a programmatic weakness in the plant's corrective action program.

In July 1992, Unit 2 was in Mode 3 (Hot Standby). While repacking 2-MMO-240, the valve stem was found to be pitted, scored and in need of replacement. At that time an Action Request was initiated to replace the stem. Since a repair activity of this type requires cooldown to Mode 5 to perform, a scheduling code of U2R94 was assigned, adding the repair to the scope of the 1994 refueling outage.

At the time the U2R94 code was assigned, in the absence of prior failure history, this was the correct designation. The valve stem replacement would only have been elevated to the forced outage schedule if the subsequent, repeated repairs had been identified as rework and an adverse trend.

Since the valve stem deficiency was first identified, 2-MMO-240 has been repacked five additional times. Had the valve stem replacement been scheduled as a forced outage activity, there would have been two opportunities prior to the violation to complete the repair. The first opportunity occurred in August 1993 when the unit experienced a reactor trip and forced outage. The second opportunity occurred in January 1994 when the unit was removed from service to repair an unisolable steam leak on Steam Generator 21 blowdown line.

Repeated packing replacements were not identified in the plant's Corrective Action Program (PMI-7030) as an adverse trend. PMI-7030, "Corrective Action Program," requires a condition report to be written for similar corrective maintenance work within 90 days of the original deficiency. Only the final packing failure on May 17, 1994, fell within the 90 day criteria, as this failure occurred 57 days after the previous repair on March 21, 1994.

A rework condition report was not initiated following the May 17 failure due to an error in the Maintenance Administrative Procedure (MAP) #MA3.3-05, "Maintenance Planning". MAP #MA3.3-05 incorrectly defined rework as similar work performed within 30 days of the original failure, rather than 90 days. As a result of this error the maintenance planner failed to identify the reoccurrence of the packing leak on May 17, 1994, as falling within the definition of rework.

3. Corrective Actions Taken and Results Achieved

The work control process code was changed on the 2-MMO-240 repair Job Order. The 2-MMO-240 repair task now appears on the forced outage schedule, as well as within the scope of the refueling outage.

MAP #MA3.3-05, "Maintenance Planning," was revised to reflect the current definition of rework contained in PMI-7030.

4. Corrective Actions Taken to Avoid Further Violations

PMI-7030, "Corrective Action," will be revised to redefine rework. The definition for rework will now include any corrective maintenance which requires entry into a Limiting Condition of Operation (LCO) if similar work has been performed on that equipment/component during the current operating cycle, including the previous refueling outage. When rework of this type occurs, a Condition Report will be written to aid in the identification/evaluation of an adverse trend.

The "90-day" standard will be retained for work upon equipment or components which do not initiate an LCO entry.

MAP #MA3.3-05, "Maintenance Planning," will be revised to refer to PMI-7030 for the above-described redefinition of rework. These measures will assure that this type of condition will be precluded in the future.

5. Date When Full Compliance Will Be Achieved

PMI-7030 and MAP modifications will be completed by September 30, 1994.

The valve stem replacement for 2-MMO-240 will be completed during the first Mode 5 forced outage of sufficient duration or the upcoming Unit 2 refueling outage, scheduled to commence September 6, 1994, whichever occurs first.