

# PRIORITY 1

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 FITZPATRICK, E.      Indiana Michigan Power Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
 MARTIN, J. B.      Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 940921 ltr re violations noted in insp repts  
 50-315/94-14 & 50-316/94-14 on 940702-0812. Corrective  
 actions: procedures controlling operator tours have been  
 revised to explicitly state expectations for performance.

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Indiana Michigan  
Power Company  
P.O. Box 16631  
Columbus, OH 43246



AEP:NRC:1212H  
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 NOS. 50-315/94014 (DRP)  
AND 50-316/94014 (DRP)  
REPLY TO NOTICE OF VIOLATION

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

Attn: Mr. J. B. Martin

October 21, 1994

Dear Mr. Martin:

This letter is in response to a USNRC letter dated September 21, 1994, that forwarded a notice of violation to Indiana Michigan Power Company. The notice of violation contained two violations identified during a routine safety inspection conducted by Messrs. James A. Isom, David J. Hartland, and John H. Niesler from July 2, 1994, through August 12, 1994. One violation is associated with operator tour record falsification issues. The second violation is associated with the inadvertent blocking of emergency lighting due to the erection of scaffolding and herculite.

Our reply to the first violation of the notice of violation is provided in the attachment to this letter. Corrective actions for the second violation were reviewed and found to be acceptable by the inspectors during the inspection. No response with respect to the second violation is required by the aforementioned NRC letter.

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PDR ADDCK 05000315  
Q PDR

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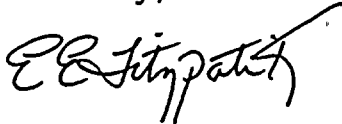
Mr. J. B. Martin

-2-

AEP:NRC:1212H

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

Attachment

cc: A. A. Blind  
G. Charnoff  
NRC Resident Inspector  
NFEM Section Chief  
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 foregoing response to NRC INSPECTION REPORTS NOS. 50-315/94014 (DRP) AND 50-316/94014 (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 21st  
day of October, 19 94.

Rita D. Hill

NOTARY PUBLIC

RITA D. HILL

NOTARY PUBLIC, STATE OF OHIO  
MY COMMISSION EXPIRES 6-22-99



ATTACHMENT TO AEP:NRC:1212H

REPLY TO NOTICE OF VIOLATION

### Background

A routine safety inspection was conducted by Messrs. J. A. Isom, D. J. Hartland, and J. H. Niesler from July 2, 1994, through August 12, 1994.

During this inspection, two items were found to be in violation. The first violation is associated with operator tour record falsification issues. The second violation is associated with the inadvertent blocking of emergency lighting due to the erection of scaffolding and herculite.

These violations were set forth in a letter containing the notice of violation, dated September 21, 1994, from Mr. E. G. Greenman, Director, Division of Reactor Projects, USNRC, Region III. The letter was received September 27, 1994.

Our response to the first violation of the notice of violation is contained within this document. Corrective actions for the second violation were reviewed by the inspectors during the inspection and found to be to their satisfaction. Therefore, no response with respect to the second violation is required.

### NRC Violation

"10 CFR 50.9 requires that information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects.

Paragraph "a" of Unit 1 Technical Specifications 6.8.1 requires that written procedures shall be established, implemented, and maintained for applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

Paragraph 2.g in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, requires that power operation and process monitoring activities shall be covered by written procedures.

Operation procedures, "Plant Tour Guidelines," 01-OHP 5030.001.001, Revision 1, and 02-OHP 5030.001.001, Revision 1, requires that the operator performing the tour initial the datasheet indicating that a tour of the associated areas was performed.



Contrary to the above, during 1993, twenty-five operators incorrectly initialed the tour datasheet indicating that a tour of an associated area was performed when the tour had not been performed. This caused multiple instances of an inaccurate tour record to be generated.

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 was less than adequate management oversight of the operator tour performance in the following areas.

- Implementation of management expectations for operator tour performance

The procedural guidance for conducting operator tours was not clear as to what a tour was to accomplish. The methods used to document tour performance did not ensure that an accurate record of tour performance was generated.

- Staff responsibilities for assessing adequate tour performance

The responsibility for periodic auditing of operator tour records was informally stated and tracked. There was no feedback mechanism to alert management that the periodic audit was not performed or that it was overdue.

- Supervisory monitoring of tour performance

The monitoring of operator tour performance had been assigned to and was being performed by personnel in staff positions who were not directly responsible for the operators performing tours.

- Establishing accountability for effective operator tours

Line management and tour operators have not been held accountable for the effectiveness of operator tours. Although the third quarter 1993 audit of operator tours identified discrepancies between tour point signoffs and door entry records, no actions were taken to emphasize management and operator accountability for these discrepancies.

- Management vigor and example in communication of expectations regarding operator tour performance

Corporate and upper level plant management vigor and example in the area of operator tour performance are apparent by the documented record which clearly indicates management's concern and position on this subject. While subsequent correspondence from the operations superintendent to all operations department personnel did emphasize the importance of integrity, it failed to mention the firm stance regarding actions delineated in the earlier upper level plant management correspondence.

- Scheduling work activities to ensure tours are properly performed

The operators who were assigned tour duties were also expected to respond to requests from the control room to perform various activities ranging from scheduled evolutions to emergent work. Because these requests represented real time activities which were to be performed in sequence or were reactive in nature, the routine tour activities were performed as time became available.

3. Corrective Actions Taken and Results Achieved

Because operator tours are performed on a routine basis, corrective actions were not considered to be applicable. When the discrepancies became known, tours of the areas in question had already been completed multiple times. These subsequent tours revealed no previously unidentified problems in any of the areas.

4. Corrective Actions Taken to Avoid Further Violations

The procedures controlling operator tours have been revised to explicitly state the expectations for operator tour performance. The revision also directs that operators carry tour data sheets on their rounds to immediately record the completion of tour activities.

An Operations Head Instruction, OHI-7011, has been implemented to address supervisory responsibility for checking tour records and individual operator accountability for tour discrepancies.

Shift meetings have been conducted to communicate and reaffirm the department management expectations for tour performance.

An Operations Head Instruction, OHI-5031, has been implemented to establish a high priority for the completion of operator tour duties.

5. Date When Full Compliance Will Be Achieved

All preventive actions were completed by September 13, 1994, therefore, full compliance was achieved on that date.



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



AEP:NRC:1212H  
10 CFR 2.201

Donald C. Cook Nuclear Plant Units 1 and 2  
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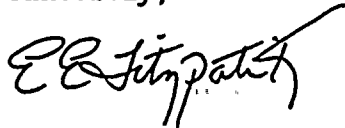
Mr. J. B. Martin

-2-

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