

PRIORITY 1

(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SESSION NBR: 9411220274 DOC. DATE: 94/11/16 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: Provides response to violations noted in Insp Repts
 50-315/94-18 & 50-316/94-18. Corrective action: request tags
 identified by inspector as not being removed verified on
 941027, to have since been removed.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7
 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	FILE CENTER 02	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
	RGN3 FILE 01	1 1		
EXTERNAL:	LITCO 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 18 ENCL 18

P
R
I
O
R
I
T
Y

1

D
O
C
U
M
E
N
T



Indiana Michigan
Power Company
P.O. Box 16621
Columbus, OH 43221



AEP:NRC:1212I
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. 50-315/94018 (DRP)
AND 50-316/94018 (DRP)
REPLY TO NOTICE OF VIOLATION

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

Attn: Mr. J. B. Martin

November 16, 1994

Dear Mr. Martin:

This letter is in response to a USNRC letter dated October 21, 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. James A. Isom, David J. Hartland, D. L. Shepard, M. P. Huber, J. F. Schapker, and C. N. Orsini from August 13 through September 23, 1994. The violation is associated with the failure to remove action request tags upon resolution of the deficiencies documented on the tags.

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 that reads 'E. E. Fitzpatrick'.

E. E. Fitzpatrick
Vice President

jc

Attachments

9411220274 941116
PDR ADOCK 05000315
G PDR

210107

Handwritten initials, possibly 'JEO', followed by a vertical line.

Mr. J. B. Martin

-2-

AEP:NRC:1212I

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. 50-315/94018 (DRP) AND 50-316/94018 (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 14th

day of November, 19 97.

Rita D. Hill
NOTARY PUBLIC

RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-23-99

ATTACHMENT TO AEP:NRC:12121

REPLY TO NOTICE OF VIOLATION

Background

A routine safety inspection was conducted by Messrs. J. A. Isom, D. J. Hartland, D. L. Shepard, M. P. Huber, J. F. Schapker, and C. N. Orsini from August 13 through September 23, 1994.

During this inspection, one item was found to be in violation. The violation is associated with the failure to remove action request tags upon resolution of the deficiencies documented on the tags.

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

Our response to the notice of violation is contained within this document.

NRC Violation

"Technical Specification 6.8.1.a 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.

Regulatory Guide 1.33, paragraph 9.e.1 of Appendix "A," requires that procedures for the control of maintenance include information such as the method for obtaining permission and clearance for operation personnel to work and for logging of such work.

Procedure NPM-02CM, Revision 4, "Nuclear Plant Maintenance System Process Instruction," requires the logging and removing of action request tags associated with equipment requiring corrective maintenance. Specifically, paragraphs 5.2.1.B.4 and 5.13.3.g require that all action request tags be removed upon successful completion of the corrective maintenance or upon rejection of the action request following initial review.

Contrary to the above, on September 26 and 28, 1994, licensee personnel failed to remove Action Request tags from the Unit 2 turbine-driven auxiliary feedwater (TDAFW) pump trip and throttle valve (T&TV) and from a local control panel located in the Unit 2 "CD" emergency diesel generator (EDG) despite resolution of the deficiencies documented on the subject tags.

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

Response to Violation

For clarification purposes:

The notice of violation indicates that an action request tag was not removed from the Unit 2 turbine-driven auxiliary feedwater (TDAFW) pump trip and throttle valve (T&TV). Through subsequent discussion with the resident inspector, it has been determined that it was the Unit 1 TDAFW pump T&TV which was involved, not the Unit 2 TDAFW pump T&TV.

1. Admission or Denial of the Alleged Violation

Indiana Michigan Power Company admits to the violation as cited in the NRC Notice of Violation, with note to the above clarification.

2. Reasons for the Violation

The process at Cook Nuclear Plant for documenting and physically accounting for the use, location, and removal of action request tags is not adequate to assure tag removal after action requests are rejected or work has been completed.

3. Corrective Actions Taken and Results Achieved

The action request tags that were identified by the inspector as not having been removed were verified on October 27, 1994, to have since been removed.

4. Corrective Actions Taken to Avoid Further Violations

The plant process will be revised to implement a different method for documenting and physically accounting for the use, location, and removal of action request tags. This process change is scheduled for implementation by June 1, 1995. This date is based on the estimated amount of time required to develop, review, and train on the new process. The concern of failing to remove action request tags is that it may inhibit personnel from initiating new action requests or may result in an inaccurate assessment in the plant of the condition of plant components. Historically, the plant action request tag use, location, and removal process has not lead to a significant safety concern or inaccurate assessment of plant components. Also, it is not expected that during the time to implement the new process that such conditions would evolve, based on equipment surveillance requirements and the ability of plant personnel to access the action request system and evaluate action request status independent of tag placement.

However, in the interim, the production superintendents will sensitize their personnel to the existing circumstances and expectations. In addition, an action request tag review and validation process will be initiated to assure achievement of full compliance by June 1, 1995.

5. Date When Full Compliance will be Achieved

Full compliance will be achieved by June 1, 1995, with the implementation of the revision to the action request process.

