



AEP:NRC:1184H1
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. 50-315/93012 (DRS)
AND 50-316/93012 (DRS)
REPLY TO NOTICE OF VIOLATION (SYSTEM BASED
INSTRUMENTATION AND CONTROL INSPECTION)

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

Attn: J. B. Martin

November 28, 1994

Dear Mr. Martin:

By letter dated January 4, 1994, (AEP:NRC:1184H), we responded to a Notice of Violation dated November 23, 1993, associated with the subject NRC inspection. The violations were associated with 1) errors in a setpoint calculation for refueling water storage tank level instrumentation and 2) the lack of an unreviewed safety question determination for Temporary Modification 2-93-015, which installed an I to I converter in the Unit 2 feedwater pump control circuitry.

By letter dated October 4, 1994, the NRC expressed concern with our response to violation No. 2. Our revised response to violation No. 2 is contained in the attachment to this letter.

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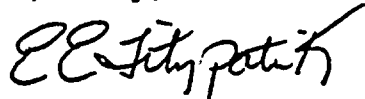
J. B. Martin

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AEP:NRC:1184H1

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

eh

Attachments

cc: A. A. Blind
G. Charnoff
NFEM Section Chief
NRC Resident Inspector - Bridgman
J. R. Padgett
W. T. Russell - NRC Region III

ATTACHMENT TO AEP:NRC:1184H1

RESPONSE TO NRC CONCERNS REGARDING
REPLY TO NOTICE OF VIOLATION: NRC
INSPECTION REPORT NOS. 50-315/93012(DRS) AND
50-316/93012(DRS)

NRC Response to Reply

"With regard to your response to violation No. 2, we disagree with your position that this violation does not represent a departure with NRC regulations. Specifically, we do not agree with your interpretation of 10 CFR 50.59 that the specific speed control circuitry needs to be explicitly described in the UFSAR to prompt a safety evaluation. It is our position that if the structure, system or component (SSC) being modified can affect the performance of a larger SSC, in this case the speed control circuit affecting the feedwater pump, then a safety evaluation must be performed.

The steam generator feedwater control system, the feedwater system, and the feedwater pump's variable speed mechanical drive are addressed in the UFSAR. In particular, UFSAR Section 10.5.1.1 states that "the variable speed turbine driven main feedwater pumps are designed to provide the required feedwater flow to the steam generators." The steam generator feedwater system is an important system in ensuring continued heat removal from the reactor core. A safety evaluation should have been performed to assess the potential consequences of modifying the turbine's speed control system with respect to, among others, the probability of occurrence of a loss of feedwater accident.

Because your screening process apparently focuses only on structures, systems, or components which are explicitly described in the UFSAR, the potential exists for modifications to be implemented without a thorough safety evaluation.

Please provide your response to this concern within 30 days of this letter."

Response to NRC Concern

In response to the concerns raised in the NRC's letter of October 4, 1994, we are amending our original response to violation 2 from the Notice of Violation. The revised response is contained below.

1. Admission or Denial of the Alleged Violation

Indiana Michigan Power admits to the violation as cited in the NRC Notice of Violation.

2. Reason for the Violation

The reason for the violation is a difference in

interpretation of the requirements of 10 CFR 50.59.

With respect to the design change of the I to I converter (Temporary Modification TM 2-93-015), neither the function of the main feedwater pumps as described in the UFSAR (to provide feedwater flow to the steam generators) nor the method of performing the function as described in the UFSAR (with variable speed pumps) was impacted by the change. Additionally, complete loss of feedwater (independent of the specific reason) was already an analyzed UFSAR Chapter 14 event. Thus, in the judgment of the individuals performing the screening, the change represented neither an explicit nor an implicit change to the UFSAR, and therefore an unreviewed safety question determination was not performed.

3. Corrective Actions Taken and Results Achieved

The I to I converter was removed from the circuitry on September 12, 1994.

4. Corrective Actions Taken to Avoid Further Violations

Prior to the SBICI inspection, we were performing Unreviewed Safety Question determinations for all Request for Changes and Minor Modifications (generally safety related/safety interface changes), regardless of the results of the 10 CFR 50.59 screening. Following the SBICI, we modified the Temporary Modification process such that Unreviewed Safety Question determinations are now performed for all temporary modifications involving safety related and/or seismic class I or II equipment. Additionally, we will modify our design change process such that we perform Unreviewed Safety Question determinations for the balance of the design changes (Plant Modifications and non-safety related/non-seismic class I or II Temporary Modifications). This change will be implemented by December 31, 1994, for design changes for which physical work is not in progress as of that date.

5. Date When Full Compliance will be Achieved

Full compliance was achieved on September 12, 1994, when the I to I converter was removed from the circuitry.

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 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
 MARTIN, J.B. Document Control Branch (Document Control Desk)

SUBJECT: Forwards revised response to violation 2 from NOV dtd 931123
 associated w/Insp Repts 50-315/93-12 & 50-316/93-12.
 Corrective actions: I to I converter removed from circuitry
 on 940912.

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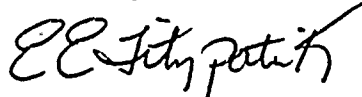
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NRC Resident Inspector - Bridgman
J. R. Padgett
W. T. Russell - NRC Region III



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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 Reply to Notice of Violation (System Based Instrumentation and Control Inspection), 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 28th
day of November, 19 92.

Lisa D Hill
NOTARY PUBLIC

RTA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-22-99



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