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SUBJECT: Informs of change to previous commitment made in response to
 NOV from insp repts 50-315/78-27 & 50-316/78-31 re blocking
 alarms.

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June 12, 1995

AEP:NRC:00106A

Docket Nos. 50-315
50-316

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

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
NOTIFICATION OF MODIFIED COMMITMENT
ON BLOCKING ALARMS

During review of a proposed change to a plant procedure regarding actions to be taken in response to blocked control room alarms, a commitment made to the NRC seventeen years ago was uncovered. Our evaluation found that, while the commitment had been satisfied in the plant procedures at that time, the current procedure revision was not in full, literal compliance with the original commitment. Actual current plant practice was, however, considered to be equivalent or superior to the intent of the commitment. The purpose of this letter, therefore, is to inform you of our plan to change the previous commitment. Specifically, the previous commitment was made in response to a Notice of Violation from IE Inspection Reports No. 50-315/78-27 and 50-316/78-31. In those reports, a finding identified that the low temperature alarm in the control room for the Unit 2 RWST was blocked without being approved or logged. AEPSC responded to this Notice of Violation on December 21, 1978, in letter AEP:NRC:00106. The initial corrective action included a procedural requirement that the Unit Supervisor, who is in charge of the Control Room, remove all blocked alarms prior to turning over to the relieving shift.

The practice in recent years has been to require more thorough technical review and documentation for blocked alarms. The technical reviews are independently verified as part of the documentation process. The alarm status is also followed very closely by plant management and by AEPSC representatives in a

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morning status meeting. Each problem alarm, which includes blocked alarms, is documented and is discussed three days a week in the daily morning meeting that includes plant management and AEPSC representatives. In addition, the 1995 AEPNO Production Work Plan - Performance Standards specify that high priority standing annunciators be cleared within 14 days during operation, and within 14 days of parallel following outages. The increased attention by management, as well as by the system engineers at Cook Nuclear Plant, and the "full deck" equipment operating philosophy, has generally resulted in fewer blocked alarms, for shorter periods, than existed at the time the original commitment was made in 1978.

Both Cook Nuclear Plant unit control rooms operated without a single annunciator lit on April 16, 1995. This is the first time that this performance measure was achieved in the operating history of the plant. Reaching this operating record is evidence of the effectiveness of our policies on annunciator alarms and underlying design, engineering, and maintenance issues.

We now plan to revise the commitment we made in AEP:NRC:00106, dated December 21, 1978, concerning blocked alarms. Any blocked alarms will be removed once per week to see if the blocking is still needed. The Unit Supervisor will review a list of the currently blocked alarms prior to coming on duty each shift, but unblocking alarms and technical review of blocked alarms will be performed only once per week, rather than once per shift. Regular oversight of blocked alarms by management and system engineers provides additional assurance of safe operation.

In accordance with our procedures and NRC regulations, a safety review was completed for the proposed modification of this commitment. This safety review concluded that the change would be beneficial and prudent and would have no deleterious effect on the health and safety of the public. Therefore, based upon the above review, we believe that there is technical justification to support modification of the current commitment.

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As a result of our review, we now believe that the change in commitment, which we plan to implement by June 30, 1995, will result in effective control of blocked alarms.

Sincerely,

for *W. H. Smith*
E. E. Fitzpatrick
Vice President

cad

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