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ACCESSION NBR: 9507030124 DOC. DATE: 95/06/26 NOTARIZED: NO DOCKET #  
FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315 P  
50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316  
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SUBJECT: Advises that safety review of proposed cancellation of  
commitment re blocked alarms concluded that cancellation  
would be beneficial & prudent & therefore justified. O

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June 26, 1995

AEP:NRC:00106B

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 CANCELLED COMMITMENT  
ON BLOCKING ALARMS

This letter supersedes letter AEP:NRC:00106A, dated June 12, 1995, which was an earlier version of the letter stored in the computer, printed, and mailed in error. It is worth noting that neither the initial conditions nor the end point included in the superseded 00106A are altered by this revised submittal. We regret any inconvenience this error may cause.

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 cancel 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 number of problem alarms is also

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followed by plant management and by AEPSC representatives in a morning status meeting. 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. The overall management of alarms has significantly improved, without dependence on the commitment that will be cancelled.

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.

The commitment we made in AEP:NRC:00106, dated December 21, 1978, concerning blocked alarms is not needed and can be cancelled. Under our current practice, the Unit Supervisor reviews a list of the currently blocked alarms prior to coming on duty each shift. Technical reviews are also performed when an alarm is blocked, under our current practice. 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 cancellation 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 cancellation of the current commitment.

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As a result of our review, we believe that the cancellation of the commitment will result in continued effective control of blocked alarms.

Sincerely,

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

cad

cc: A. A. Blind  
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