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50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316
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SUBJECT: Responds to NRC 950912 ltr re violations noted in insp repts 50-315/95-09 & 50-316/95-09.Corrective actions:operators briefed shift supervisors on mgt expectations for procedure use & strict adherance.

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TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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PO Box 16631
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AEP
INDIANA
MICHIGAN
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October 11, 1995

AEP:NRC:1224B
10 CFR 2.201

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
NRC INSPECTION REPORTS NO. 50-315/95009 (DRP)
AND 50-316/95009 (DRP)
REPLY TO NOTICE OF VIOLATIONS

This letter is in response to a letter from W. L. Axelson dated September 12, 1995, that forwarded a notice of violation to Indiana Michigan Power Company. The notice of violation contained three violations of NRC requirements identified during a routine safety inspection conducted by Messrs. J. Isom, D. Hartland, C. Orsini, D. Butler, and R. Paul from June 20 through August 17, 1995. The violations are associated with procedural noncompliance, inadequate reporting of events and inadequate post maintenance testing.

We understand the significance of the violations and we assure you that our performance in their regard does not reflect our normal high standards. In the area of procedural compliance we conclude that our aggressiveness to search out areas, where human factors and procedure clarity need enhancements, had declined. We have revitalized our efforts to ensure that necessary procedural enhancements are made in a timely manner by placing accountability for procedure clarity on the procedure users and their immediate supervision. In addition, we have re-emphasized the policy of strict procedural compliance with supervisor and other key personnel, as appropriate, in operations, maintenance and engineering. In the area of reportability, we have revised our procedure to clarify reportable conditions and to prompt more conservative decisions relative to reportability. Finally, in the area of post maintenance testing, the significance of this issue is being addressed with a new standard to control the testing.

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We consider the actions to be taken for the loss of main condenser vacuum an open issue because of the need to consider the interrelationships between these actions and all operational factors. We will be continuing this evaluation to determine the most appropriate actions for the loss of main condenser vacuum. At the conclusion of our evaluation we will communicate our results to the NRC.

Also of note in the inspection report was a concern with lack of operator self-checking. This concern was also expressed during an Operations Department assessment conducted in response to a recent event. This concern is being addressed in an overall Operations Shift Performance Improvement Plan which was implemented September 10, 1995 and is discussed, in part, in the attachment to this letter.

Our reply to the violations is provided in the attachment to this letter.

Sincerely,

E E Fitzpatrick

E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 11th DAY OF October 1995

Notary Public

My Commission Expires: 3-9-96

plt

Attachment

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

ATTACHMENT TO AEP:NRC:1224B

REPLY TO NOTICE OF VIOLATION: NRC
INSPECTION REPORT NOS. 50-315/95009 (DRP) AND
50-316/95009 (DRP)

During an NRC inspection conducted June 20 through August 17, 1995, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," (60 FR 34381; June 30, 1995) the violations and the Donald C. Cook Nuclear Plant responses are listed below:

NRC Violation No. 1

1. D. C. Cook Plant Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. The following are examples of failure to follow procedures:

   a. Regulatory Guide 1.33, Appendix A, paragraph 6.e requires that a loss of condenser vacuum procedure be written as part of procedures available for combating emergencies and other significant events.

      Operations Department Procedure **01-OHP 4024.118, Revision 6, "Annunciator #118 Response: Main and FPT," step 3.1 of "Drop 71" states: "Reduce turbine load as rapidly as possible."

      Contrary to the above, on July 14, 1995, the operators failed to reduce power during a loss of main turbine condenser vacuum transient.

   b. Regulatory Guide 1.33, Appendix A, paragraph 2.e. requires that plant operations procedures be written for turbine startup and synchronization of the generator.

      Operations Department Procedure **01-OHP 4021.050.001, Revision 11, "Turbine Generator Normal Startup and Operation," step 4.3.15 states: "Place 1-GCM-11, Generator Core Monitor, in service per Attachment 1."

      Contrary to the above, on July 16, 1995, the operators failed to place the Generator Core Monitor in service.

   c. Regulatory Guide 1.33, Appendix A, paragraph 9.d requires that procedures categorized as maintenance or operating procedures be written for exercising of equipment that is normally idle but must operate when required.

Procedure 12 EHP.6040.PER.141, step 5.17 states that if a main steam safety valve (MSSV) cannot be exercised, stop testing immediately and notify the shift supervisor (SS).

Contrary to the above, on June 19, 1995, with the unit at approximately 55 percent power, the licensee began exercising the Unit 1 MSSVs. While testing MSSV-1-SV-3-2, which had a setpoint of 1085 psig, the equivalent of 1180 psig was applied without the valve lifting. The SS and control room operators were not informed that testing had stopped because 1-SV-3-2 would not lift.

This is a Severity Level IV Violation (Supplement I). (315/316/95009-01)

Response to NRC Violation No. 1

1. Admission or Denial of the Alleged Violation

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

2. Reasons for the Violation

The examples cited in the Notice of Violation point to a weakness in strict procedural adherence within the Operations and Plant Engineering Departments.

In the first example operators did not reduce power during a rapid loss of main turbine condenser vacuum transient based on the Shift Supervisor's judgment that there would be limited opportunity to benefit from reducing load and that operator resources could be better used to investigate the condenser problem. The Shift Supervisor saw this as an acceptable option because the procedure steps permitted these activities to be performed concurrently, and he interpreted concurrently to mean that he had a choice of what steps to perform and when to perform them, not that the steps had to be performed at the same time.

In the second example the operators did not perform Step 4.3.15 of the procedure which required that the generator core monitor be placed into service per Attachment 1 before closing the exciter breaker. This resulted from the operator's understanding from reading of the procedural information that the step did not have to be completed prior to exciter breaker closure.

In the third example, testing of the Main Steam Safety Valves was stopped so the test engineer could consult with his supervisor and the valve vendor to determine if more force could be applied without damaging the valve. At this point the test engineer was questioning if the valve could be exercised with more force, but he had not yet concluded the valve was untestable. In addition, the valve was already declared inoperable as part of the pretest conditions. The procedure calls for the Shift Supervisor to be notified when a valve can not be exercised. Based on the test engineers perspective, the Shift Supervisor notification requirement was not yet applicable.

3. Corrective Actions Taken and Results Achieved

For the first example a note in the annunciator response procedures' subsequent action section was changed to allow performance of steps as deemed appropriate by the Unit Supervisor. Evaluation of the most appropriate actions for the loss of main condenser vacuum is continuing and the evaluation results will be communicated to the NRC.

For the second example a caution was added to both the Unit 1 and Unit 2 Turbine Generator Normal Startup and Operation procedure to require the Generator Condition Monitor be placed in service prior to closing the exciter field control breaker. This caution more clearly states the requirement for placing in service of the generator condition monitor.

For the third example, following the delay in testing and after the test engineer had conferred with his supervisor and the valve vendor, additional lifting force was applied to valve 1-SV-3-2 and the valve was successfully opened. Additionally, the remaining MSSVs were successfully exercised. The valves which required higher-than-expected force to lift were subsequently retested and reset to the required T/S tolerances.

In response to the violation, Procedure **12 EHP 6040 PER.141, Main Steam Safety Valve (MSSV) Exercising Using AVK Ultrastar Equipment, has been canceled. Procedure **12 EHP 4030 STP.256, Main Steam Safety Valve Setpoint Verification, will be used in the future for all MSSV testing. **12 EHP 4030 STP.256 has been revised to more clearly state the requirements when the Shift Supervisor should be notified.

4. Corrective Actions Taken to Avoid Further Violations

Preventive actions were taken on a departmental basis to address the more underlying weaknesses related to strict procedural adherence. Action has also been taken on a Cook Nuclear Plant-wide basis to emphasize procedure compliance and procedure quality. Following is a brief summary of these efforts.

OPERATIONS

Operators have been briefed by their Shift Supervisors on management expectations for procedure use and strict adherence. This briefing was conducted as part of an overall Operations Shift Performance Improvement Plan implemented on September 10, 1995 in response to a self-identified decline in overall performance.

Additionally, Operations shift personnel, as directed by the Shift Supervisors, have assumed the responsibility of being personally accountable for making procedure changes, using the procedure change sheet process, when procedures are found ambiguous or are in need of clarification. This will provide a more effective feedback mechanism through this established review process, and increase shift ownership of the procedures. In the past, procedure change suggestions to improve clarity, were made to the office staff, to be implemented when work load and priority permitted. This resulted in continued reliance on operator interpretation of the original procedure.

MAINTENANCE AND PLANT ENGINEERING

Maintenance and Plant Engineering Superintendents have met with their supervisors and other key personnel and instructed them on Management expectations with regard to strict procedural adherence as found in Plant Manager's Instruction (PMI)-2011, "Procedure Use and Adherence."

Guidance will be issued to plant personnel concerning communications necessary for the conduct and control of testing. This will serve to update and reinforce previous guidance in this area, and it will specifically address the Main Steam Safety Valve situation and other conditions presenting similar susceptibility for error. This guidance will be issued by November 1, 1995.

PLANT WIDE

To address any potentially generic issues in regards to overall plant compliance with procedural requirements, a plant wide procedural compliance self-assessment using the Management Oversight and Risk Tree (MORT) evaluation process will be conducted. The MORT evaluation is scheduled for completion by November 1, 1995. Further actions of a generic nature will be conducted based on the results of this evaluation.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved on October 12, 1995 following revision to **12 EHP 4030 STP.256, Main Steam Safety Valve Setpoint Verification.

NRC Violation No. 2

2. 10 CFR Part 50.72, paragraph (b)(1)(ii)(B) requires that a condition outside the design basis of the plant be reported to the NRC within one hour of occurrence.

10 CFR Part 50.72, paragraph (b)(2)(ii) requires that any event or condition that results in a manual or automatic actuation of any engineered safety feature be reported to the NRC within four hours of occurrence.

Contrary to the above,

a. On July 4, 1995, the licensee failed to report the temporary loss of automatic four loop ECCS injection capability. This condition is outside the accident analysis currently docketed and approved by the NRC.

b. On October 12, 1994, the licensee failed to report a phase "A" containment isolation signal that resulted in the unexpected isolation of the Unit 2 containment purge valves. The phase "A" containment isolation signal is listed as part of the ESF actuation system instrumentation in paragraph 9.a of Table 3.3-3 of TS.

c. On July, 28, 1995, the licensee failed to report the unexpected automatic start of the Unit 1 TDAFW pump during a power source transfer evolution. The autostart signal for the TDAFW pump due to reactor coolant pump bus undervoltage is listed as part of the ESF actuation system instrumentation in paragraph 7.b of Table 3.3-3 of TS.

d. On April 2, 1994, the licensee failed to report the inoperability of both trains of Unit 2 engineered safety feature exhaust fans, a condition outside the design basis of the plant.

This is a Severity Level IV violation. (Supplement I)(315/316/95009-02)

Response to NRC Violation No. 2

1. Admission or Denial of the Alleged Violation

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

2. Reasons for the Violation

The events in the Notice of Violation each point to a weakness in the evaluation of events or conditions, when determining reportability for conditions found outside the plant design bases or actuation of engineered safety features.

The reportability evaluation consists of event or condition identification, followed by a review of the reporting criteria by the Shift Supervisor, Shift Technical Advisor, Licensing Coordinator and Plant Management. Weaknesses in the evaluations were:

a. Misinterpretation by the evaluation group as to proper classification of entries into T/S 3.0.3 as also being conditions outside the plant's design basis.

b. Misinterpretation by the evaluation group as to what constituted an engineered safety features actuation.

3. Corrective Actions Taken and Results Achieved

On August 17, 1995, Plant Manager Procedure PMP 7030.001.001, Prompt NRC Notification, was revised to clarify reporting requirements regarding reporting of engineered safety features and solid state protection system actuations.

The condition reports associated with each of the subject events were reevaluated for reportabilty based on elimination of the misinterpretations and all events were determined to be reportable. Licensee Event Reports were submitted for each of the subject events per 10 CFR 50.73.

4. Corrective Actions Taken to Avoid Further Violations

Plant Manager Procedure PMP 7030.001.001, Prompt NRC Notification, was revised to simplify and clarify the evaluation of events which result in conditions outside the plant's design basis and actuations of engineered safety features.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on September 13, 1995 with completion of the revised reportability evaluations.

NRC Violation No. 3

3. 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," requires that a test program be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed.

Contrary to the above, the licensee did not perform adequate testing following maintenance to assure that the following components would perform their intended function satisfactorily:

a. The Unit 1 main generator voltage regulator was not tested following potentiometer replacement. This resulted in over-excitation of the main generator and damage to the main transformer during a subsequent generator paralleling evolution.

b. A slow start was performed on the Unit 2 "AB" EDG following replacement of the turbocharger starting air assist insert. Starting air is not supplied to the turbocharger during a slow start.

c. Following the post-maintenance testing on the "West" Diesel-driven fire water pump following work on pressure regulating valve 12-ZRV-404, the system was declared operable despite being unable to maintain system pressure.

This is a Severity Level IV violation (Supplement I).(315/316/95009-03)"

Response to NRC Violation No. 3

1. Admission or Denial of the Alleged Violation

Indiana Michigan Power admits to the violation as cited in the NRC Notice of Violation. Although it is a valid example of problems associated with post maintenance testing, and we have addressed it in our response, the main generator voltage regulator and potentiometer replacement involves balance of plant equipment which is not included under 10 CFR 50 Appendix B.

2. Reasons for the Violation

The examples in the Notice of Violation all point to a weakness in the planning process for Post Maintenance Testing (PMT) activities. The controls for the PMT process were not adequate to ensure that appropriate PMTs were performed for the events.

Identified weakness include:

a. Inconsistent level of training and qualifications among planners.

b. Limited review/oversight of post maintenance test planning.

c. If the scope of the original maintenance activity is exceeded, the designated PMT is not always re-evaluated.

3. Corrective Actions Taken and Results Achieved

An interim plan to enhance the current requirements of Plant Manager Standing Order (PMSO).122 and PMSO.154 has been implemented.

PMSO.122 "Voluntary removal from service of T/S required equipment, vital secondary equipment, and fire protection." This PMSO requires Plant Engineering Department review and approval of PMT for equipment maintenance activities requiring entry into limiting conditions for operations (LCO).

PMSO.154 "Planning for Post Maintenance Testing Activities." This PMSO establishes conditions under which Plant Engineering should be contacted to assist with planning PMT activities.

As an interim measure the Plant Engineering Department has been placed in line to perform reviews of PMT associated with activities for work on functionally significant systems. Functionally significant systems are as follows: Electrical Distribution - 250vdc, Electrical Distribution, Feedwater, Auxiliary Feedwater, Essential Service Water, Non Essential Service, Component Cooling Water, Condensate, Circulating Water, Compressed Air, Emergency Diesel Generators, Ventilation, Chemical Volume & Control System, Main Electrical Generator, Steam, Containment, Process Water, Emergency Core Cooling System, Control Instrument & Monitoring, Sampling, Main Turbine, Reactor Coolant, Drains, Radiation Control & Monitoring, Fire Protection and Waste Disposal.

The Plant Engineering Department has completed a review of selected Unit-1 Refueling 1995 Job Order activities to verify proper PMT was identified in the planning of work.

The Plant Engineering Department post maintenance testing reviews are now providing an engineering overview of the PMT requirements as part of the initial planning evolution.

4. Corrective Actions Taken to Avoid Further Violations

A new standard is being developed to govern Plant PMT requirements. This standard will incorporate a component-specific planning matrix similar in nature to the PMT reference manuals developed and endorsed by INPO, and EPRI. The standard will address issues such as training, division of responsibility, departmental interface, and matrix updating/enhancements.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved with the issuance of the PMT procedure, which has a scheduled approval date of December 29, 1995.