

# CATEGORY 1

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 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.                American Electric Power Co., Inc.  
 RECIP. NAME                    RECIPIENT AFFILIATION  
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SUBJECT: Submits response to violations noted in Insp Repts  
 50-315/96-11 & 50-316/96-11. Corrective actions: immediate  
 operability determination concluded no operability concerns  
 existed for essential svc water pumps.

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Indiana Michigan  
Power Company  
500 Circle Drive  
Buchanan, MI 49107 1395



January 17, 1997

AEP:NRC:1238G  
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. 50-315/96011 (DRP)  
AND 50-316/96011 (DRP) REPLY TO NOTICE OF VIOLATIONS

This letter is in response to a letter from J. L. Caldwell dated December 5, 1996, that forwarded a notice of violation to Indiana Michigan Power Company. The notice of violation contained one violation of NRC requirements identified during a routine safety inspection conducted by Messrs. B. Bartlett, B. Fuller, and J. Maynen from September 1 through October 12, 1996. The violation is associated with a failure to follow plant procedures in the installation of a temporary modification.

Our response was due to you on January 4, 1997; however, on December 16, 1996, we requested an extension to January 17, 1997, which was granted by Mr. L. Miller, Jr., of Region III.

Our reply to the violation is provided in the attachment to this letter. The reply does not contain any personal privacy, proprietary, or safeguards information.

Sincerely,

A handwritten signature in cursive script, appearing to read "E. E. Fitzpatrick".

E. E. Fitzpatrick  
Vice President

jen

Attachment

cc: A. A. Blind  
A. B. Beach  
MDEQ - DW & RPD  
NRC Resident Inspector  
J. R. Padgett

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 17<sup>th</sup> DAY OF JANUARY 1997

Jan Watson  
Notary Public

My Commission Expires: \_\_\_\_\_

JAN WATSON  
NOTARY PUBLIC, BERRIEN COUNTY, MI  
MY COMMISSION EXPIRES FEB. 10, 1999

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PDR ADOCK 05000315  
Q PDR

IED 1/1



ATTACHMENT TO AEP:NRC:1238G

REPLY TO NOTICE OF VIOLATION: NRC  
INSPECTION REPORT NOS. 50-315/96011 (DRP) AND  
50-316/96011 (DRP)

During an NRC inspection conducted from September 1 through October 12, 1996, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation and the Donald C. Cook Nuclear Plant response are provided below.

#### NRC Violation

"Technical Specification (TS) 6.8, Procedures and Programs, 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, Rev 2, February 1978.

Regulatory Guide (RG) 1.33, Quality Assurance Program Requirements (Operations), Appendix A, states that safety-related maintenance activities should be covered by written procedures.

Plant Managers Procedure (PMP) 5040 MOD.001, Revision 5, 'Temporary Modifications,' implements, in part, TS 6.8 and RG 1.33, and requires that temporary modification installations be performed in accordance with the controls delineated therein. PMP 5040 MOD.001 defines a temporary modification as "Any short term configuration that exists on plant systems, components, or structures ... which does not conform to approved plant drawings ... and is being used to maintain operation of the plant."

Contrary to the above:

On September 3, 1996, the NRC inspectors identified that the licensee had opened three small penetrations through a wall separating the mild environment of the safety related essential service water pumps from the potentially harsh environment of the turbine building. The openings did not conform to approved plant drawings, but the licensee failed to utilize the temporary modification process required by PMP 5040 MOD.001 when removing the penetration covers.

This is a Severity Level IV violation."

#### Response to NRC Violation

##### 1. Admission or Denial of the Alleged Violation

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

##### 2. Reasons for the Violation

The cause of the violation was a weakness in the temporary modification process. The temporary modification process allowed for use and connection of equipment outside the temporary modification process, as long as the points connecting to the plant systems were designed for that purpose, i.e., service connections. Under such conditions however, a technical review, including the impact of the penetration of barriers, was not required.



### 3. Corrective Actions Taken and Results Achieved

An immediate operability determination concluded no operability concerns existed for the essential service water pumps from the potentially harsh environment of the turbine building based on the opening of the three penetrations.

As a control mechanism for the openings, a closure cap and an HELB boundary label are provided on each side of the subject penetrations.

The NOV identified three small penetrations through a wall separating the mild environment of the safety related essential service water pumps from the potentially harsh environment of the turbine building. Of the three holes, one was servicing the plant biocide program, another had an air line running through it, and the third was servicing the reverse osmosis system to the makeup plant.

The following actions were taken for the penetrations.

- a) For the penetration associated with the biocide program, a temporary modification was performed in accordance with the temporary modification procedure, PMP 5040 MOD.001. The temporary modification review addressed removal of the HELB penetration cover.
- b) For the penetration that had an air line running through it, the air line was removed and closure caps were installed. This restored the penetration to the approved plant drawing.
- c) For the penetration supporting the reverse osmosis system, an HELB barrier evaluation was performed supporting continued use of the penetration.

Disposition and evaluation of the three penetrations were complete by November 14, 1996. In addition, actions were initiated to formally accept the subject HELB penetrations, either in the closed or open position, as part of the approved plant design. The approved plant drawing to reflect this condition was in place on January 16, 1997.





4. Corrective Actions to Avoid Further Violations

The temporary modification procedure, PMP 5040 MOD.001, was revised to provide guidance regarding control of service connections and the need for a technical review. In addition, the technical review requirements of the procedure were revised to address HELB barriers. In conjunction with this, the HELB procedure, PMP 4030.001.002, was revised to more clearly define HELB barrier requirements. The revision includes the requirement for an HELB review as part of the work control planning process.

In addition, the following changes were made to integrate the HELB program into plant processes.

Maintenance procedure, PMP 5020.001.001, "Maintenance Permits," was revised to address HELB boundaries when drilling through concrete.

Two construction procedures, 12 CHP 5021.CCD.007, "Masonry Block, Brick and Facing Installation," and 12 CDP 5021.CCD.015, "Removable High Density Block Fire Walls," were revised to address HELB boundaries.

5. Date When Full Compliance will be Achieved

Full compliance was achieved on November 14, 1996, following disposition and evaluation of the three penetrations.

