

Indiana Michigan
Power Company
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Buchanan, MI 49107 1395



INDIANA
MICHIGAN
POWER

June 30, 1997

AEP:NRC:1260D
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. 50-315/97003 (DRS)
AND 50-316/97003 (DRS)
RESPONSE TO NOTICE OF VIOLATIONS

This letter is in response to a letter from J. A. Grobe, dated May 30, 1997, that forwarded a notice of two violations of NRC requirements to Indiana Michigan Power Company. The violations were identified during an inspection of the licensed reactor operator (RO) and senior reactor operator (SRO) requalification training programs conducted by Messrs. Plettner, Bielby, and Cataldo from February 10, 1997, through March 14, 1997.

The first violation involves two procedures that were not designated as "in hand". The second violation involves the failure to conduct a comprehensive requalification annual operating test for all licensed operators.

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

Sincerely,

E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 30 DAY OF June 1997

Notary Public

My Commission Expires: 2/16/2001

JANICE M. BICKERS
Notary Public, Berrien County, MI
My Commission Expires Feb. 16, 2001

vlb

Attachment

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U. S. Nuclear Regulatory Commission
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c: A. A. Blind
A. B. Beach
MDEQ - DW & RPD
NRC Resident Inspector
J. R. Padgett

ATTACHMENT TO AEP:NRC:1260D

RESPONSE TO NOTICE OF VIOLATION:
NRC INSPECTION REPORT NOS. 50-315/97003 (DRS)
AND 50-316/97003 (DRS)



During an NRC inspection conducted February 10, 1997, through March 14, 1997, two violations of NRC requirements were identified. In accordance with NUREG -1600, "General Statement of Policy and Procedures for NRC Enforcement Actions", the violations and our responses are provided below.

NRC Violation No. 1

"Technical Specification Section 6.8.1 requires that written procedures shall be established, implemented and maintained covering the activities referenced in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978. The licensee utilizes Plant Manager Instructions (PMI) to implement the Technical Specification requirements.

PMI-2011, "Procedure Use and Adherence," Section 3.1.1 designates that "In Hand" procedures are indicated by a "***" in the procedure number. The facility's Quality Assurance Program document dated July 1995, Section 1.7.5.2.5 states, in part, "Examples of "In Hand" procedures are those developed for extensive or complex jobs where reliance on memory cannot be trusted. Further, those procedures which describe a sequence which cannot be altered, or require the documentation of data during the course of the procedure, are considered."

Contrary to the above, the inspectors identified that two procedures involving complex jobs where reliance on memory cannot be trusted and the sequences cannot be altered were not designated as "In Hand" procedures with the "***". 12 OHP 4021.018.002, "Placing In Service and Operating the Spent Fuel Pit Cooling and Cleanup System," Revision 11, dated August 12, 1996, and 12 OHP 4021.018.013, "Filling, Emptying and Refilling Fuel Transfer Canal," Revision 7, dated January 7, 1997.

This is a Severity Level IV violation (Supplement 1)."

Response to Violation No. 1

1. Admission or Denial of the Alleged Violation

We admit to the violation as cited in the notice of violation.

2. Reasons for the Violation

The cause of this event was the failure to clearly define what attributes a procedure must contain relative to the expected usage level. Historically, with the exception of the broad quality assurance program document (QAPD) definition, there was no concise definition for "in hand" procedures. As a result, the procedures were developed and usage levels assigned based on the knowledge of the writers and reviewers. The operations department did not attempt to develop its own definition for "in hand" and non-in-hand procedures. For the two procedures identified in the notice of violation an incorrect usage level was assigned based on the broad definition provided.



3. Corrective Actions Taken and Results Achieved

12 OHP 4021.018.002, "Placing In Service and Operating the Spent Fuel Pit Cooling and Cleanup System," revision 11, dated August 12, 1996, and 12 OHP 4021.018.013, "Filling, Emptying and Refilling Fuel Transfer Canal," revision 7, dated January 7, 1997, were reviewed against the current PMI-2011 requirements and designated as continuous use procedures. A continuous use procedure is the equivalent to the previous "in hand" procedure.

4. Corrective Actions Taken to Avoid Further Violations

PMI-2011, "Procedure Use and Adherence", was revised on May 23, 1997 (revision 3), to provide clear definitions for procedure attributes and usage levels. In addition, by August 1, 1997, once PMI-2011, revision 3, is fully implemented, procedures will be designated as either continuous use, reference use, or information use procedures. This procedure designation practice is based on the industry standard for procedure designation.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved on August 1, 1997, when all procedures are required to meet the requirements of PMI-2011, revision 3, for designation of usage levels.

NRC Violation No. 2

"10 CFR 50.54(k), "Conditions of licenses" states "An operator or senior operator licensed pursuant to Part 55 of this chapter shall be present at the controls at all times during the operation of the facility." 10 CFR 55.59(a)(2) "Requalification requirements" states "Each licensee (individual licensed operator or senior operator) shall pass a comprehensive requalification written and an annual operating test."

Contrary to the above, the inspectors identified that during the 1996/1997 two year requalification cycle, the facility licensee failed to conduct a comprehensive requalification annual operating test for all licensed operators.

This is a Severity Level IV violation (Supplement 1)."

Response to Violation No. 2

1. Admission or Denial of the Alleged Violation

We admit to the violation as cited in the notice of violation.

2. Reasons for the Violation

The cause of the violation was the lack of an in-depth review of NUREG-1262 when conducting a change to the licensed operator requalification training program. A change to the licensed operator requalification training program was conducted in 1996 that allowed the reorganization of operating tests. These program changes did not receive an in-depth review to determine if the changes were in alignment



with the expectations of 10 CFR 55.59(a)(2) as emphasized in NUREG-1262.

3. Corrective Actions Taken and Results Achieved

The licensed operator requalification program, training program management plan, section 3.03, "Licensed Operator Requalification Program," was revised to require that the operating test for each individual licensed operator be conducted within a seven day time period. This change to the amount of time for conducting the test was approved on March 19, 1997, and was immediately followed by a re-examination of those licensed operators who did not complete their test within seven days. All of the operators were subject to re-examination and were qualified under the current requirements.

4. Corrective Actions Taken to Avoid Further Violations

The licensed operator requalification program, training program management Plan, Section 3.03, "Licensed Operator Requalification Program," has been revised to add NUREG-1262 to the reference section. A training department head procedure has been prepared to describe technical review requirements for revisions to the training program management plan. This administrative guidance requires a person other than the author to review changes to ensure the requirements contained in reference section documents continue to be enforced. In addition, a review of NUREG-1262 was conducted to ensure any additional information provided by the NUREG relative to code compliance has been adequately reflected in the licensed operation requalification program.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on April 7, 1997, following re-examinations.

