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50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316
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FITZPATRICK, E. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 940715 ltr re violations noted in insp rept
50-315/94-12 & 50-316/94-12. Corrective actions: fire watch
training lesson plan was revised.

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Indiana Michigan
Power Company
P.O. Box 16631
Columbus, OH 43216



AEP:NRC:1212E
10 CFR 2.201

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC INSPECTION REPORTS NO. 50-315/94012 (DRS)
AND 50-316/94012 (DRS)
REPLY TO NOTICE OF VIOLATION

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

Attn: Mr. J. B. Martin

July 11, 1994

Dear Mr. Martin:

This letter is in response to a USNRC letter dated June 15, 1994, that forwarded a notice of violation to Indiana Michigan Power Company. The notice of violation contained one violation identified during an inspection conducted by Mr. D. Schrum from June 1 through June 8, 1994. The violation is associated with the failure to remove or cover combustible materials within 35 feet of welding, brazing, cutting, and grinding activities.

Our reply to the notice of violation is provided in the attachment to this letter.

This letter is submitted pursuant to 10 CFR 50.54(f) and, as such, an oath statement is attached.

Sincerely,

A handwritten signature in cursive script, reading "E. E. Fitzpatrick".

E. E. Fitzpatrick
Vice President

dr
Attachments

180010

9407180184 940711
PDR ADDCK 05000315
Q PDR

JEV

Mr. W. T. Russell

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AEP:NRC:1212E

cc: A. A. Blind
G. Charnoff
W. T. Russell, NRC - Washington, D.C.
NRC Resident Inspector
NFEM Section Chief
J. R. Padgett

STATE OF OHIO)
COUNTY OF FRANKLIN)

E. E. Fitzpatrick, being duly sworn, deposes and says that he is the Vice President of licensee Indiana Michigan Power Company, that he has read the forgoing response to NRC INSPECTION REPORTS NO. 50-315/94012 (DRS) AND 50-316/94012 (DRS), REPLY TO NOTICE OF VIOLATION and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

E E Fitzpatrick

Subscribed and sworn to before me this 11th
day of July, 19 94.

Rita D. Hill
NOTARY PUBLIC
RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-22-99

ATTACHMENT TO AEP:NRC:1212E

REPLY TO NOTICE OF VIOLATION

Background

An inspection was conducted by Mr. D. Schrum from June 1 through June 8, 1994. The inspection consisted of plant area observations and reviews of fire protection surveillances, maintenance on fire protection equipment, fire brigade training and drills, fire reports, deviation reports, work requests, safety evaluations, and audits of fire protection activities.

During this inspection, one item was found to be in violation. The violation was identified as the failure to remove or cover combustible materials within 35 feet of welding, brazing, cutting, and grinding activities.

This violation was set forth in a letter containing the notice of violation, dated June 15, 1994, from Mr. W. D. Shafer, Chief, Maintenance and Outage Section, USNRC, Region III. The letter was received June 20, 1994. Our response to the notice of violation is contained within this document.

NRG Violation

"Technical Specification 6.8.1.a requires adherence to fire protection implementing procedures.

Cook Nuclear Plant Manager's Instruction, PMI-2270, "Fire Protection," Revision 22, requires that a work area be cleared of all combustible materials below or within 35 feet of work or a non-flammable material be provided to cover or shield adjacent or lower equipment.

Contrary to the above:

On June 3, 1994, the inspector observed grinding, welding, and cutting activities in the turbine building that did not have combustibles removed or covered within 35 feet of these activities (50-315/316/94012-01(DRS)).

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

Response to 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

Welding, burning, and grinding (WBG) permits are issued by fire technicians prior to the commencement of such activities. In most of the recently issued WBG permits, requirements had not been specified for ensuring that the 35-foot radius area around each activity is clear of combustible materials or that all combustible materials in the area are covered. Also, fire technicians and fire watch personnel had become lax in their enforcement of the 35-foot radius area.

3. Corrective Actions Taken and Results Achieved

Immediately after being notified by the NRC inspector on June 3 of the deviations with regard to the 35-foot radius area, the on-duty fire brigade personnel were dispatched to have each of the areas under active WBG permits cleaned up to conform to the 35-foot radius area requirements before any further work could be performed in these areas.

4. Corrective Actions Taken to Avoid Further Violations

The requirement to remove or cover all combustibles within a 35-foot radius area of the work area is now being specified on all WBG permits.

Signs were posted by all WBG permits that were active as of June 3 that remind all workers of the requirements for the removal or covering of combustible materials. Identical signs were also attached to the clipboards that belong to each fire watch.

An electronic mail message was sent by the fire protection supervisor to the superintendents of the site nuclear services, maintenance, and plant protection departments, the fire protection coordinators, and the fire technicians. This electronic mail message was subsequently followed by a formal memorandum which was issued on June 9. Both of these transmittals outlined what was found by the NRC inspector and what would be the expectations for WBG permit activities with regard to combustibles.

As part of their pre-shift briefings that occurred on or soon after June 3, all fire technicians reviewed the WBG requirements, which included the requirement to ensure that all combustibles within a 35-foot radius area be removed or covered.

On a similar schedule, all fire watch personnel were reminded of their responsibility to review the special requirements on WBG permits, their responsibility to notify their supervisor when WBG



permit requirements and conditions are not being met, and their authority to stop any job not being conducted in accordance with the special instructions of a WBG permit. For future work involving WBG permits, this information is now being covered during all routine pre-job briefings.

On June 15, the fire watch training lesson plan was revised. As part of this revision, the old lesson plan was separated into six new lesson plans. Two of these plans, "Fire Watch Duties and Responsibilities", FW-C-9003, and "Fire Watch On-the-Job Training", FW-L-9006, include emphasis on the fire watch duties and responsibilities for WBG activities that was absent from the previous lesson plan.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 3, 1994, with the clean up of the active WBG permit areas which brought all of these areas into compliance with the 35-foot radius area requirement for the removal or covering of combustible materials.

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