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 FITZPATRICK,E. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Provides supplemental info re response to violations noted
 in insp repts 50-315/95-12 & 50-316/95-12. Corrective'
 actions: new foreign matl exclusion program established.

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Indiana Michigan
Power Company
P.O. Box 16631
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April 8, 1996

AEP:NRC:1224E1

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. 50-315/95012 (DRP)
AND 50-316/95012 (DRP)
REPLY TO NOTICE OF VIOLATIONS:
SUPPLEMENTAL INFORMATION

Our letter AEP:NRC:1224E, dated January 29, 1996, provided our response to a letter from W. J. Kropp dated December 28, 1995, that forwarded a notice of violation to Indiana Michigan Power Company. The violation was associated with debris inside the unit 1 containment building. Subsequently, our Senior Resident Inspector requested that we provide additional information on actions we are taking in regard to foreign material exclusion. The information is provided in the attachment to this letter.

Sincerely,

E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 8th DAY OF April 1996

Notary Public

My Commission Expires: 6-28-99

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U. S. Nuclear Regulatory Commission
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AEP:NRC:1224E1

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:1224E1

FOREIGN MATERIAL EXCLUSION (FME) PROGRAM

Background

This letter provides additional information regarding our response to a letter from W. J. Kropp dated December 28, 1995, that forwarded a notice of violation to Indiana Michigan Power Company. The violation was identified during a routine safety inspection tour conducted by Messrs. Bartlett, Hartland, Orsini, Dunlop, Winter, and Belanger from October 12, 1995, through December 4, 1995. The violation was associated with debris inside upper containment.

On October 16, 1995, during a tour of the unit 1 upper containment, the inspectors identified trash and debris in general areas. The inspection was performed after the containment closeout was completed. The inspectors determined that our corrective actions for a similar condition in 1994 did not prevent a recurrence.

The violation was specific to a procedural violation, i.e., our failure to comply with the requirement of procedure OHP 4030.001.001, "Containment Inspection Tour," to remove all trash and loose debris from all areas of upper containment and the ice condenser. Correspondingly, our response to the violation addressed our failure to comply with the procedural requirements. On March 29, 1996, our Senior Resident Inspector requested that we provide additional information regarding improvements made to our overall foreign material exclusion (FME) program. These improvements were made as a result of our review of the above noted inspector concerns and INPO SOER 95-1, "Reducing Events Resulting From Foreign Material Intrusion." The improvements have not been fully implemented as we are in a transition from our old process to the new process.

Actions Taken

Following the issuance of INPO SOER 95-1 and the notice of violation, a team was established to review the information and develop corrective actions. The result was the development of a new FME program that is comprehensive and minimizes procedural complexity. The new FME program was made effective March 27, 1996, with full implementation required within 45 days. Implementation of the program is through Plant Manager Instruction (PMI) 2220, "Foreign Material Exclusion," and Plant Manager Procedure (PMP) 2220.001.001, "Foreign Material Exclusion." Major changes made with the new FME program include the definition of FME zones and institution of a front end approach, i.e., enhanced planning, verses the inspection/retrieval method previously employed.

The objectives of the PMI are to: 1) provide direction to ensure that plant systems and components are maintained to an appropriate degree of cleanliness during the performance of any activity which exposes the internals of a system or component; and 2) to ensure that each system and component is capable of safe and efficient operation after work activities are complete. This program applies to all plant systems and components.

The objectives of the supporting PMP are to: 1) establish guidance for performing general work, inspections, and other activities in a manner which could reduce or eliminate the introduction of foreign material into a system or equipment; 2) establish guidance for retrieving any foreign material that may have entered a system or component; 3) establish the spent fuel pool (SFP), transfer canal, and refueling cavity as well as the surrounding and overlying spaces as FME zones, and establish a procedure for conducting work activities or inspections near or around the SFP, transfer canal, or refueling cavity; and 4) establish the minimum requirements for conducting a post-job inspection upon completion of any job activity performed within an FME zone.

Also contained in the PMP is special consideration for containment. It is made clear in the PMP that containment is considered to be a system.

Actions taken to facilitate transition from the old standard to the new include the following.

- a. An FME training video has been issued and reviewed by appropriate personnel. The FME training tape provides management expectations and increases employee awareness of the new FME program.
- b. The FME training tape has been incorporated into the General Employee Training (GET) and associated GET requalification programs.
- c. Visual aids have been posted throughout the plant to increase personnel FME awareness.
- d. A meeting was held with contractor supervisors prior to the unit 2 refueling outage in which the subject of FME throughout the plant was discussed. Emphasis was placed on our previous poor containment cleanliness performance and the fact that containment is a system.
- e. Meetings were held with first line supervisors to review the intent and expectations of the new FME program.



- f. Periodic management FME tours throughout the plant were established to provide oversight during the unit 2 refueling outage to facilitate transition to the new FME program standard.

Since the unit 2 refueling outage is occurring during the transition period, a containment cleanup project plan, U2R96 Project Plan Number 11, was developed to aid in meeting the new standard on containment close-out. Part of the project plan includes radiation protection department personnel conducting regular and routine decontamination and cleaning tours in the containment building to enhance the day to day appearance of containment and to reduce the amount of cleaning to be done at the end of the outage.

