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 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 980113 ltr re violations noted in insp repts
 50-315/97-18 & 50-316/97-18. Corrective actions: review of
 current practices was conducted to ensure that proper
 controls were in place to prevent recurrence.

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February 23, 1998

AEP:NRC:1260J
10 CFR 2.201

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
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Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-315/97018 (DRP);
NO. 50-316/97018 (DRP)

This letter is in response to a letter from Geoffrey E. Grant, dated January 13, 1998, that transmitted a notice of violation. The notice of violation contained one violation of NRC requirements identified during an inspection conducted by Messrs. B. Bartlett, B. Fuller, J. Maynen and E. Schweibinz on September 26, 1997, through November 7, 1997. The violation is associated with plant procedures that did not meet the requirements of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings." Our reply to the violation is provided in the attachment to this letter.

The letter from Mr. Grant, dated January 13, 1998, was not received in our offices until January 21, 1998. This was discussed with Mr. Bruce Burgess of Region III on February 4, 1998. He agreed to extend the due date from February 12, 1998, to February 23, 1998.

Sincerely,

E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 23 DAY OF February, 1998

Notary Public

My Commission Expires 2/14/2001

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

/vlb

Attachments

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PDR ADOCK 05000315
G PDR





U.S. Nuclear Regulatory Commission
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AEP:NRC:1260J

c: J. R. Sampson
A. B. Beach
MDEQ - DW & RPD
NRC Resident Inspector
J. A. Abramson



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ATTACHMENT TO AEP:NRC:1260J

REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-315/97018 (DRP);
NO. 50-316/97018 (DRP)

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During an NRC inspection conducted from September 26, 1997, to November 7, 1997, 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 is stated below, followed by our response. We also include a general response to the issue of providing quality procedures.

NRC Violation

"10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality be prescribed by procedures of a type appropriate to the circumstances and be accomplished in accordance with these procedures.

Contrary to the above,

- A. On October 17, 1997, the inspectors identified that procedure 02-OHP 4021.082.003, Revision 3, "Feeding 600 Volt Buses Through Bus Tie Breakers," was not appropriate to the circumstances in that it allowed, under certain circumstances, an excessive load to be placed on the emergency diesel generators.
- B. On October 17, 1997, the inspectors identified that procedure 02-OHP 4021.082.013, Revision 2, "Isolating, Transferring and Restoring a 250 VDC Load," was not appropriate to the circumstances in that it failed to contain adequate guidance to ensure that battery cross-ties would not be overloaded.
- C. On October 22, 1997, the inspectors identified that Emergency Operating Procedure E-0, 01[02]-OHP 4023.E-0, Revision 14[12], "Reactor Trip or Safety Injection," was not appropriate to the circumstances in that 12 examples were identified where the set point for a reactor trip or safety injection as stated in E-0 was not as stated in the plant set point document.

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

Response to Violation Item A

1. Admission or Denial of the Alleged Violation

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

2. Reason for Violation

The reason for this item of the violation is insufficient documentation of the basis for the values used. Had the basis for the values selected been documented and controlled in a more readily retrievable fashion, it would have been easier to determine whether adequate protection of the 600 VAC bus was being provided by the procedure. During the investigation into this condition, a memo requesting the addition of overcurrent limits in the procedure was identified. However, insufficient information was available to show how the limits used were selected.



3. Corrective Action Taken and Results Achieved

An engineering calculation, PS-600VD-012, was performed on October 30, 1997, and it was determined that the maximum continuous loading, whether or not the bus is cross-tied, is 225 amps for the essential (ESS) buses and 140 amps for balance of plant buses. Another engineering calculation, PS-EDGL-006, demonstrated that procedures were not adequate to assure the emergency diesel generator (EDG) continuous rating would not be exceeded had operators initiated cross-tie operation of the 600V ESS buses subsequent to a blackout (BO), a BO with safety injection (SI), or a BO with containment spray. Based on this, engineering direction was provided to control the EDG loading prior to cross-tying 600V ESS buses, and to not exceed the EDG continuous load ratings while cross-tied. The above information was provided to operations through technical direction memo (TDM) ENTDM 97-0126, "600V Bus Cross-Tie Procedure OHP 4021.082.003 Current Limitations."

For unit 1, 01-OHP 4021.082.003, revision 6, "Feeding 600 Volt Buses Through Bus Tie Breaker", was made effective on November 17, 1997, to correct the identified issue and incorporate information contained in ENTDM 97-0126. For unit 2, 02-OHP 4021.082.003, revision 4, "Feeding 600 Volt Buses Through Bus Tie Breaker", was made effective on November 2, 1997, to correct the identified issue and incorporate information contained in ENTDM 97-0126. 10 CFR 50.59 screenings performed on both procedures determined that no unreviewed safety question existed.

4. Corrective Actions to Avoid Further Violations

AEPNG procedure 227200-STG-2400-02, "Technical Direction", provides requirements for providing technical direction to ensure that information is accurate, based on sound engineering principles, and properly communicated and documented. This procedure was not in effect when the operating procedure at issue was incorrectly revised. The AEPNG procedure establishes appropriate reviews, approvals, and documentation to support correct transfer of technical information.

The current revision of OPM.002, revision 4, "Operations Department Procedure Review Manual", requires a system engineer review of procedure revisions. This was not in place at the time of the event. The system engineer review provides additional assurance of plant and system compatibility, and that the procedure is technically correct.

TDM ENTDM 97-0126, "600V Bus Cross-Tie Procedure OHP 4021.082.003 Current Limitations", has been placed in the procedures reference section to maintain a record of the requirement with the procedure.

5. Date When Full Compliance Will Be Achieved

Full compliance for this item was achieved on November 17, 1997, following revision to both units' procedures.



Response to Violation Item B1. Admission or Denial of the Alleged Violation

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

2. Reason for Violation

A review of historical information relative to the procedure did not reveal why guidance had not been incorporated into the procedure to prevent overloading a battery during a cross-tie condition. We believe that guidance was not provided because the procedure for cross-tying batteries is applicable only during modes 5 and 6. In modes 5 or 6, certain components that are fed from the DC busses are assumed not to operate. Review has shown that these assumptions are reasonable and consistent with plant operating history. The components assumed not to operate are associated with main turbine and main feedwater support systems not normally used in modes 5 and 6.

3. Corrective Action Taken and Results Achieved

A technical direction memo (TDM) was issued on October 13, 1997, relative to the unit 2 AB/CD cross-tie operation. The TDM contained the guidance for the 2AB and 2CD battery to be cross-tied in modes 5 and 6. A similar TDM, ENTDM 97-0133, "Battery 1AB/CD Cross-tie", was issued for the 1AB and 1CD battery.

For unit 1, 01-OHP 4021.082.013, revision 6, "Isolating, Transferring and Restoring a 250 VDC Battery Load", was made effective on December 12, 1997, to provide guidance from ENTDM 97-0133 to ensure that battery cross-tying during modes 5 and 6 would not result in an overload condition. For unit 2, 02-OHP 4021.082.013, revision 2, change sheet 1, "Isolating, Transferring and Restoring a 250 VDC Battery Load", was made effective on October 23, 1997, to provide guidance from the October 13, 1997, TDM to ensure that battery cross-tying during modes 5 and 6 would not result in an overload condition.

4. Corrective Actions to Avoid Further Violations

A review of current practices was conducted to ensure proper controls are in place to prevent recurrence. Per guidance provided in OPM.002, revision 4, "Operations Department Procedure Review Manual", a system engineer review is required to provide assurance of plant and system compatibility for the procedure and determine if the procedure is technically correct as written.

For unit 1, ENTDM 97-0133, "Battery 1AB/CD Cross-Tie", dated December 4, 1997, was placed in the procedure reference section to maintain a record of the requirement along with the procedure. For unit 2, the October 13, 1997, TDM, "Battery 2AB/CD Cross-Tie Operation", was placed in the procedure's reference section to maintain record of the requirement with the procedure.

5. Date When Full Compliance Will Be Achieved

Full compliance for this item was achieved on December 12, 1997, following revision to both units' procedures.

Response to Violation Item C

1. Admission or Denial of the Alleged Violation

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

2. Reason for Violation

The reason for this violation was a lack of guidance provided for the review and evaluation of the affected setpoint changes. PMP 6065.ISP.001, "Plant Instrument Setpoint Control Program", requires completed change packages be sent to applicable plant departments for procedure impact review. When operations received a setpoint change, the change was evaluated for significance, and if considered a significant change, the appropriate procedures would be changed. If the change was considered insignificant, procedure changes would not be made. Insufficient guidance was provided to make this determination. Based on this, we believe that when operations was notified of the setpoint changes, the changes were considered insignificant and no procedure changes were made.

3. Corrective Action Taken and Results Achieved

The plant setpoint document (PSPD) was reviewed against the emergency operating procedures (EOPs) setpoints, and the applicable EOPs were revised to reflect the setpoints in the PSPD.

For unit 1, 01-OHP 4023.E-0, revision 14, change sheet 3, "Reactor Trip or Safety Injection", was made effective on October 30, 1997, to obtain consistency between the procedure and the PSPD. For unit 2, 02-OHP 4023.E-0, revision 12, change sheet 3, "Reactor Trip or Safety Injection", was made effective on October 30, 1997, to obtain consistency between the procedure and the PSPD.

4. Corrective Actions to Avoid Further Violations

The operations department procedure revision manual, OPM.001, attachment 1, was revised to clarify the use of setpoints listed in the operations department procedures. The operations procedure manual now provides specific actions for the review of setpoint changes.

5. Date When Full Compliance Will Be Achieved

Full compliance for this item was obtained on October 30, 1997, following revision to both units' procedures.



General Response to Violation

The following describes additional actions taken to provide additional assurance of conformance and to avoid further violations on a broad basis.

1. Additional Action

Additional action relative to other system/train cross-tying was performed in response to a single failure concern identified during the 1997 architect engineering design inspection. We performed a review of other safety systems with cross-tie capabilities, either between trains or between units, to provide reasonable assurance that single failure criteria have been appropriately considered and that procedures allowing the use of the cross-ties have been properly evaluated. Systems reviewed were:

- Electrical Distribution Systems
 - 250 VDC
 - 480 VAC
 - 600 VAC
- Auxiliary Feedwater System
- Essential Service Water System
- Chemical and Volume Control System

The review confirmed that the systems were operable when cross-tied in accordance with existing procedures.

2. Additional Actions to Avoid Further Violations

Additional actions being taken to avoid further violations of a similar nature include the following:

- Operations Department Procedure Upgrade Program
- Design Basis Reconstitution Project

These actions have been described in previous docketed correspondence. A summary of each is provided below.

Operations Department Procedure Upgrade Program

The principal objective of the operations department procedure upgrade project is to provide high quality, usable procedures to improve Cook Nuclear Plant unit availability and regulatory performance.

During the NRC operational support team inspection (OSTI), the operations department committed to a program to upgrade the normal operating procedures and annunciator response procedures. Prior to the OSTI, weaknesses had been identified related to procedure quality and usability by the 1996 systematic assessment of license performance, and the 1996 INPO evaluation and assessment.

Design Basis Reconstitution Project

The purpose of the design basis reconstitution project includes the following:

- to assure an adequate understanding of, and control over, the plant's design and licensing basis requirements; and
- to provide assurance that these requirements are being implemented correctly, both in plant design and in the procedures that govern the plant's operation and maintenance.

