

CATEGORY 1

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 AUTH. NAME AUTHOR AFFILIATION
 POWERS, R.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION
 Records Management Branch (Document Control Desk)

SUBJECT: Responds to NRC 980630 ltr re violations noted in insp repts
 50-315/98-12 & 50-316/98-12. Corrective actions: operators
 confirmed that monitoring requirement did not violated TS &
 one RVLIS was returned to operable status.

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 TITLE: General (50 Dkt) - Insp Rept/Notice of Violation Response

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August 7, 1998

AEP:NRC:1285C

Docket Nos.: 50-315
50-316

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, D.C. 20555-001

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
RESPONSE TO NRC INSPECTION REPORT NOS. 50-315/98012 (DRP);
50-316/98012 (DRP) AND NOTICE OF VIOLATION

This letter is in response to a letter from John A. Grobe, dated June 30, 1998, that forwarded a notice of violations. The apparent violations of NRC requirements were identified during a routine resident inspection concluded on June 11, 1998. An extension for the submittal of this information to August 7, 1998, was previously granted.

The first violation involved whether corrective actions were adequate to provide reasonable assurance that reactor vessel head venting was performed when appropriate. The second violation involved the adequacy of a procedure that did not contain appropriate criteria for the exclusion of foreign material.

Our response to these violations is provided in the attachment to this letter.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. P. Powers".

R. P. Powers
Senior Vice President
American Electric Power
Service Corporation

/jen

attachment

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 7th DAY OF August, 1998.

A handwritten signature in dark ink, appearing to read "Valerie L. Bunnell".
Notary Public

VALERIE L. BUNNELL

My commission expires Notary Public, Berrien County, MI
~~My Commission Expires Sept. 5, 2002~~

9808170020 980807
PDR ADDCK 05000315
Q PDR



U. S. Nuclear Regulatory Commission
Page 2

AEP:NRC:1285C

c: J. A. Abramson - w/o attachment
J. L. Caldwell
MDEQ - DW & RPD - w/o attachment
NRC Resident Inspector
J. R. Sampson

bc: T. P. Beilman - w/attachment
J. J. Euto
D. R. Hafer/K. R. Baker
J. B. Kingseed/M. S. Ackerman/G. P. Arent/M. J. Gumns
PRONET - w/attachment
J. F. Stang, Jr., NRC - Washington, DC - w/attachments

ATTACHMENT TO AEP:NRC:1285C

RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-315/98012 (DRP) ,
AND 50-316/98012 (DRP)

During an NRC inspection conducted from April 28, 1998, to June 11, 1998, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below, followed by our response.

NRC Violation No. 1

"10 CFR Part 50, Appendix B, Criterion XVI, requires, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected, and that in the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Surveillance Procedure 02-OHP 4030.STP.030, "Daily and Shiftly Surveillance Checks," Revision 24, required, in part, that with no reactor coolant pumps operating, reactor vessel level must be recorded every 8 hours or the reactor vessel head must be vented once every 24 hours. The failure to comply with the surveillance procedure could allow an undetected void to occur in the reactor vessel, a significant condition adverse to quality.

Contrary to the above, on May 5, 1998, the licensee identified that the measures taken to correct a significant condition adverse to quality, the failure to properly vent the primary system, were not effective to preclude repetition of a similar event that occurred on December 16, 1997. As a result, the licensee failed to vent the reactor system head every 24 hours after stopping all the primary coolant pumps on May 3, 1998, as required by Surveillance procedure 02-OHP 4030.STP.030, Revision 24.

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

Response to Violation No. 1

1. Admission or Denial of the Alleged Violation

Indiana Michigan Power Company acknowledges the violation as cited.

2. Reason for Violation

The root cause for this violation was the failure to identify a potential weakness in procedures and administrative controls relative to the status of control room instrumentation and the utilization of reactor vessel level indication system (RVLIS) instrument readings to monitor for potential reactor vessel head void formation during our original review of the event.

On December 17, 1997, during a supervisory review of 02-OHP 4030.STP.030, data sheet 5, "Shift Surveillance Checks - Modes 5 and 6", the unit 2 unit supervisor noticed that "N/A" had been entered in step 3.0 in lieu of a reading from a (RVLIS). According to the open items log, one channel of RVLIS was operable at the time. Given this, the operable channel reading should have been logged on data sheet 5. Condition report (C/R) 97-3634 was written to document the omission. Logging of RVLIS readings continued through four eight-hour shift surveillance checks. It was subsequently determined that neither RVLIS channel was operable. There is no record that reactor vessel head venting, the contingency action for inoperable RVLIS channels, was performed during this time.

The preventive action taken in response to the December 17, 1997, event was the issuance of a lessons learned memo to the operating shift crews and other operations department personnel. The lessons learned memo briefly discussed expectations regarding the logging of RVLIS readings in OHP 4030.STP.030 and the proper utilization of "N/A".

On May 3, 1998, at 1056 hours, the last operating reactor coolant pump in unit 2 was removed from service. Procedure OHP 4030.STP.030 requires that with no reactor coolant pumps running, RVLIS readings must be logged shiftly. With RVLIS channels out of service, the reactor vessel head must be vented daily. Contrary to this, RVLIS readings were not taken for the next surveillance interval, 1600 to 2400 hours on May 3, 1998, nor was the reactor vessel head vented. This omission was quickly identified and logging of RVLIS readings commenced and continued throughout May 4. Early on May 5, 1998, it was identified that the RVLIS channels being logged were both inoperable as indicated by the open items log.

C/R 98-1907 was written to document the issues as described above. Investigation into this event revealed that the "acceptance criteria" listed in procedure 02-OHP 4030.STP.030, data sheet 5, step 3, is actually a list of instructions for performing the step, and does not provide criteria against which success can be measured. The lessons learned memo distributed after the December 17, 1997, event failed to address the procedural inadequacy, and thus was not an adequate corrective action to prevent occurrence of the May 3 event. Based on the results of the investigation, corrective actions were established to prevent recurrence, including changes to

procedures 01- and 02-OHP 4030.STP.030 and changes to the administrative controls governing the open items log.

3. Corrective Actions Taken and Results Achieved

Utilization of the inoperable RVLIS channel for readings for 02-OHP 4030.STP.030, data sheet 5, was discontinued on December 19, 1997, on discovery of the channel's status. The operators confirmed that the monitoring requirement did not involve any violation of technical specifications.

On discovery of the inoperable status of the RVLIS channels on May 5, 1998, actions were taken to promptly restore one RVLIS channel to operable status. This channel was then utilized to satisfy the applicable monitoring requirements.

4. Corrective Actions Taken to Avoid Further Violations

Procedures **01-OHP 4021.001.004 and 02-OHP 4021.001.004 have been revised to incorporate provisions to ensure that RVLIS channels are operable or that conditions for venting the reactor coolant system have been established prior to securing the reactor coolant pumps.

Procedures 01-OHP 4030.STP.030 and 02-OHP 4030.STP.030 have been revised to incorporate expanded and improved controls for monitoring of RVLIS or application of other options to guard against void formation in the reactor vessel.

The administrative control governing the utilization of operations department logs, OHI-2211, will be revised to incorporate provisions to provide additional assurance that the status of inoperable equipment is more clearly displayed without reliance on operator memory of the content of the open items log. This will be completed by September 1, 1998.

Information and lessons learned have been provided to operators regarding the December and May events. The summary discussed the wording of OHP 4030.STP.030, data sheet 5, step 3, and its contribution to the events. It also described the revision to be made to the procedure, and to the administrative control governing the use of the open items log.

This event will be presented in more detail in formal training for licensed operators by January 12, 1999.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on July 31, 1998, when revision 26, change sheet 6, and revision 24, change sheet 8, became effective for 01- and 02-OHP4030.STP.030, respectively. These change sheets incorporate expanded and improved controls for monitoring of RVLIS or application of other options to guard against void formation in the reactor vessel.

The revisions incorporating the improved guidance for monitoring of RVLIS and void formation in the reactor vessel were effective on June 13, 1998, for **01-OHP 4021.001.004, Revision 31, and on July 7, 1998, for **02-OHP 4021.001.004, Revision 21.

NRC Violation No. 2

"10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality, shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, on June 1, 1998, the inspectors identified that an activity affecting quality, the loading of safety-related borated ice into bags for temporary storage prior to transfer into the ice condenser, was performed by a procedure (Job Order C0043828) of a type inappropriate to the circumstances. The procedure for completing the ice loading was inappropriate to the circumstances in that it did not contain appropriate quantitative or qualitative acceptance criteria to ensure that the borated ice was free from the introduction of foreign material.

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

Response to Violation No. 2

1. Admission or Denial of the Alleged Violation

Indiana Michigan Power Company acknowledges the violation as cited.

2. Reason for Violation

The root cause for this violation was a weakness in the process for determining whether an electronic job order activity description screen (JOA DESC) or a procedure is appropriate for a particular work activity.

On February 1, 1998, an action request was generated to "Inspect, Repair, and Replace Ice Baskets." Job order (JO) C0043828 was derived from this action request, and job order activity (JOA) for "Maintenance Support to Fill & Load Bags with Ice" was created. It was decided to control the job by using the JOA DESC screens, rather than generating a special procedure, as it was believed that the tasks involved were within the "skill of the trade". Although a procedure determination screening checklist exists in maintenance administrative procedure (MAP) MA3.3-05, "Maintenance Planning", this checklist was not utilized when the JO for ice bag loading was prepared. This checklist is specifically used as an aid in the determination of when to use a formal procedure versus providing instructions through a JOA DESC screen.

As the work progressed, details were added to the JOA DESC as more information became available and decisions about work methods were made. Due to minimal word processing functions in the JOA DESC screen, the information that was added was not well organized, making information contained in the JOA DESC, such as information regarding foreign material exclusion, difficult to discern.

On June 1, 1998, as a result of questions posed by the NRC resident inspector, ice loading activities were stopped. It was subsequently determined that the information contained in the JOA DESC no longer adequately addressed the actual work being performed.

3. Corrective Action Taken and Results Achieved

After ice loading activities were halted, the action request, from which the JOA was originally derived, was reviewed against the procedure determination screening checklist. The decision was ultimately made to develop a special procedure.

12 MHP.SP.C4382, "Ice Bag Filling", was developed and became effective on June 4, 1998. Several steps in this procedure strengthened the controls on foreign material. A new JOA was created for use with the new procedure, and the original JOA was closed.

It should be noted that proper implementation of the new procedure was demonstrated on June 24, 1998, when foreign material was observed in the ice stream entering a storage bag. Ice transport operations were halted and an investigation was performed. The problem and the investigation results were documented in a C/R.

4. Corrective Actions to Avoid Further Violations

The need to improve definition for the planning job function had previously been identified as part of the maintenance department functional area readiness review, and is being tracked by a C/R, and in the restart database. MAP MA3.3-05 will be revised to include improved instructions on when to use the JOA DESC screen versus when to develop a formal procedure. This will be completed by November 25, 1998.

MAP MA3.3-05 will also be revised to include improved standards for communicating information in a JOA DESC by November 25, 1998.

Correspondence describing this event to other plant departments, asking departments to consider if they have given adequate attention to the definition and formality of work planning as part of their recent functional area readiness reviews, will be sent out by August 11, 1998.

An effectiveness review of improvements to MAP MA3.3-05 in the topic area of determining whether or not a procedure is required for a particular work activity is scheduled to be completed by May 25, 1999.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 4, 1998, when the special procedure was issued to govern the ice bagging work, and a new JOA was created for use with the procedure.





August 7, 1998

AEP:NRC:1285C

Docket Nos.: 50-315
50-316

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, D.C. 20555-001

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
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50-316/98012 (DRP) AND NOTICE OF VIOLATION

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The first violation involved whether corrective actions were adequate to provide reasonable assurance that reactor vessel head venting was performed when appropriate. The second violation involved the adequacy of a procedure that did not contain appropriate criteria for the exclusion of foreign material.

Our response to these violations is provided in the attachment to this letter.

Sincerely,

R. P. Powers
Senior Vice President
American Electric Power
Service Corporation

/jen

attachment

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 7th DAY OF August, 1998.

Notary Public

VALERIE L. BUNNELL

My commission expires Notary Public, Berrien County, MI
~~My Commission Expires~~ Sept. 5, 2002

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G PDR



U. S. Nuclear Regulatory Commission
Page 2

AEP:NRC:1285C

c: J. A. Abramson - w/o attachment
J. L. Caldwell
MDEQ - DW & RPD - w/o attachment
NRC Resident Inspector
J. R. Sampson

bc: T. P. Beilman - w/attachment
J. J. Euto
D. R. Hafer/K. R. Baker
J. B. Kingseed/M. S. Ackerman/G. P. Arent/M. J. Gumns
PRONET - w/attachment
J. F. Stang, Jr., NRC - Washington, DC - w/attachments

ATTACHMENT TO AEP:NRC:1285C

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NRC Violation No. 1

"10 CFR Part 50, Appendix B, Criterion XVI, requires, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected, and that in the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

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Contrary to the above, on May 5, 1998, the licensee identified that the measures taken to correct a significant condition adverse to quality, the failure to properly vent the primary system, were not effective to preclude repetition of a similar event that occurred on December 16, 1997. As a result, the licensee failed to vent the reactor system head every 24 hours after stopping all the primary coolant pumps on May 3, 1998, as required by Surveillance procedure 02-OHP 4030.STP.030, Revision 24.

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

Response to Violation No. 1

1. Admission or Denial of the Alleged Violation

Indiana Michigan Power Company acknowledges the violation as cited.

2. Reason for Violation

The root cause for this violation was the failure to identify a potential weakness in procedures and administrative controls relative to the status of control room instrumentation and the utilization of reactor vessel level indication system (RVLIS) instrument readings to monitor for potential reactor vessel head void formation during our original review of the event.



On December 17, 1997, during a supervisory review of 02-OHP 4030.STP.030, data sheet 5, "Shift Surveillance Checks - Modes 5 and 6", the unit 2 unit supervisor noticed that "N/A" had been entered in step 3.0 in lieu of a reading from a (RVLIS). According to the open items log, one channel of RVLIS was operable at the time. Given this, the operable channel reading should have been logged on data sheet 5. Condition report (C/R) 97-3634 was written to document the omission. Logging of RVLIS readings continued through four eight-hour shift surveillance checks. It was subsequently determined that neither RVLIS channel was operable. There is no record that reactor vessel head venting, the contingency action for inoperable RVLIS channels, was performed during this time.

The preventive action taken in response to the December 17, 1997, event was the issuance of a lessons learned memo to the operating shift crews and other operations department personnel. The lessons learned memo briefly discussed expectations regarding the logging of RVLIS readings in OHP 4030.STP.030 and the proper utilization of "N/A".

On May 3, 1998, at 1056 hours, the last operating reactor coolant pump in unit 2 was removed from service. Procedure OHP 4030.STP.030 requires that with no reactor coolant pumps running, RVLIS readings must be logged shiftly. With RVLIS channels out of service, the reactor vessel head must be vented daily. Contrary to this, RVLIS readings were not taken for the next surveillance interval, 1600 to 2400 hours on May 3, 1998, nor was the reactor vessel head vented. This omission was quickly identified and logging of RVLIS readings commenced and continued throughout May 4. Early on May 5, 1998, it was identified that the RVLIS channels being logged were both inoperable as indicated by the open items log.

C/R 98-1907 was written to document the issues as described above. Investigation into this event revealed that the "acceptance criteria" listed in procedure 02-OHP 4030.STP.030, data sheet 5, step 3, is actually a list of instructions for performing the step, and does not provide criteria against which success can be measured. The lessons learned memo distributed after the December 17, 1997, event failed to address the procedural inadequacy, and thus was not an adequate corrective action to prevent occurrence of the May 3 event. Based on the results of the investigation, corrective actions were established to prevent recurrence, including changes to

procedures 01- and 02-OHP 4030.STP.030 and changes to the administrative controls governing the open items log.

3. Corrective Actions Taken and Results Achieved

Utilization of the inoperable RVLIS channel for readings for 02-OHP 4030.STP.030, data sheet 5, was discontinued on December 19, 1997, on discovery of the channel's status. The operators confirmed that the monitoring requirement did not involve any violation of technical specifications.

On discovery of the inoperable status of the RVLIS channels on May 5, 1998, actions were taken to promptly restore one RVLIS channel to operable status. This channel was then utilized to satisfy the applicable monitoring requirements.

4. Corrective Actions Taken to Avoid Further Violations

Procedures **01-OHP 4021.001.004 and 02-OHP 4021.001.004 have been revised to incorporate provisions to ensure that RVLIS channels are operable or that conditions for venting the reactor coolant system have been established prior to securing the reactor coolant pumps.

Procedures 01-OHP 4030.STP.030 and 02-OHP 4030.STP.030 have been revised to incorporate expanded and improved controls for monitoring of RVLIS or application of other options to guard against void formation in the reactor vessel.

The administrative control governing the utilization of operations department logs, OHI-2211, will be revised to incorporate provisions to provide additional assurance that the status of inoperable equipment is more clearly displayed without reliance on operator memory of the content of the open items log. This will be completed by September 1, 1998.

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This event will be presented in more detail in formal training for licensed operators by January 12, 1999.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on July 31, 1998, when revision 26, change sheet 6, and revision 24, change sheet 8, became effective for 01- and 02-OHP4030.STP.030, respectively. These change sheets incorporate expanded and improved controls for monitoring of RVLIS or application of other options to guard against void formation in the reactor vessel.

The revisions incorporating the improved guidance for monitoring of RVLIS and void formation in the reactor vessel were effective on June 13, 1998, for **01-OHP 4021.001.004, Revision 31, and on July 7, 1998, for **02-OHP 4021.001.004, Revision 21.

NRC Violation No. 2

"10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality, shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, on June 1, 1998, the inspectors identified that an activity affecting quality, the loading of safety-related borated ice into bags for temporary storage prior to transfer into the ice condenser, was performed by a procedure (Job Order C0043828) of a type inappropriate to the circumstances. The procedure for completing the ice loading was inappropriate to the circumstances in that it did not contain appropriate quantitative or qualitative acceptance criteria to ensure that the borated ice was free from the introduction of foreign material.

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

Response to Violation No. 21. Admission or Denial of the Alleged Violation

Indiana Michigan Power Company acknowledges the violation as cited.



2. Reason for Violation

The root cause for this violation was a weakness in the process for determining whether an electronic job order, activity description screen (JOA DESC) or a procedure is appropriate for a particular work activity.

On February 1, 1998, an action request was generated to "Inspect, Repair, and Replace Ice Baskets." Job order (JO) C0043828 was derived from this action request, and job order activity (JOA) for "Maintenance Support to Fill & Load Bags with Ice" was created. It was decided to control the job by using the JOA DESC screens, rather than generating a special procedure, as it was believed that the tasks involved were within the "skill of the trade". Although a procedure determination screening checklist exists in maintenance administrative procedure (MAP) MA3.3-05, "Maintenance Planning", this checklist was not utilized when the JO for ice bag loading was prepared. This checklist is specifically used as an aid in the determination of when to use a formal procedure versus providing instructions through a JOA DESC screen.

As the work progressed, details were added to the JOA DESC as more information became available and decisions about work methods were made. Due to minimal word processing functions in the JOA DESC screen, the information that was added was not well organized, making information contained in the JOA DESC, such as information regarding foreign material exclusion, difficult to discern.

On June 1, 1998, as a result of questions posed by the NRC resident inspector, ice loading activities were stopped. It was subsequently determined that the information contained in the JOA DESC no longer adequately addressed the actual work being performed.

3. Corrective Action Taken and Results Achieved

After ice loading activities were halted, the action request, from which the JOA was originally derived, was reviewed against the procedure determination screening checklist. The decision was ultimately made to develop a special procedure.

12 MHP.SP.C4382, "Ice Bag Filling", was developed and became effective on June 4, 1998. Several steps in this procedure strengthened the controls on foreign material. A new JOA was created for use with the new procedure, and the original JOA was closed.

It should be noted that proper implementation of the new procedure was demonstrated on June 24, 1998, when foreign material was observed in the ice stream entering a storage bag. Ice transport operations were halted and an investigation was performed. The problem and the investigation results were documented in a C/R.

4. Corrective Actions to Avoid Further Violations

The need to improve definition for the planning job function had previously been identified as part of the maintenance department functional area readiness review, and is being tracked by a C/R, and in the restart database. MAP MA3.3-05 will be revised to include improved instructions on when to use the JOA DESC screen versus when to develop a formal procedure. This will be completed by November 25, 1998.

MAP MA3.3-05 will also be revised to include improved standards for communicating information in a JOA DESC by November 25, 1998.

Correspondence describing this event to other plant departments, asking departments to consider if they have given adequate attention to the definition and formality of work planning as part of their recent functional area readiness reviews, will be sent out by August 11, 1998.

An effectiveness review of improvements to MAP MA3.3-05 in the topic area of determining whether or not a procedure is required for a particular work activity is scheduled to be completed by May 25, 1999.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 4, 1998, when the special procedure was issued to govern the ice bagging work, and a new JOA was created for use with the procedure.

