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 FILE: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315  
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316

AUTH. NAME AUTHOR AFFILIATION  
 FITZPATRICK, E. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele  
 RECIP. NAME RECIPIENT AFFILIATION  
 MARTIN, J.B. Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 940406 ltr re violations noted in insp rept  
 50-315/94-02 & 50-316/94-02. Corrective action: testing was  
 performed to verify proper operation, required stroke length,  
 & required pressure valve.

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AEP:NRC:1212  
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. 50-315/94002 (DRP)  
AND 50-316/94002 (DRP)  
REPLY TO NOTICE OF VIOLATION

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

Attn: Mr. J. B. Martin

May 6, 1994

Dear Mr. Martin:

This letter is in response to a USNRC letter dated April 6, 1994, that forwarded a notice of violation to Indiana Michigan Power Company. The notice of violation contained one violation identified during a routine safety inspection conducted by Messrs. J. A. Isom, D. J. Hartland, C. N. Orsini, and G. D. Replogle from January 19 through March 11, 1994. The violation is associated with procedural noncompliance and inappropriate procedure designation with regard to the maintenance of Unit 2 main steam stop valve dump valve 2-MRV-241 on February 21, 1994.

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

An observation was also made in the notice of violation with regard to the I&C maintenance involvement in recent reactor trips, including the subject Unit 2 trip. To address this comment, an evaluation of I&C involvement in trip events and trip event precursors since 1990 was conducted. This study concluded that I&C's overall performance has shown improvement and their involvement in trip events and trip event precursors has decreased over the past four years. Nonetheless, we will continue to strive to improve I&C's performance. In addition, overall plant performance on reactor trips has improved each year this decade, with only two trips occurring in 1993. The reactor trip rate for 1993 meets the 1995 industry goal.

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PDR ADCK 05000315  
Q PDR

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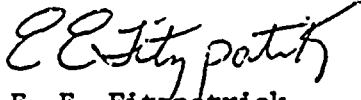
Mr. J. B. Martin

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AEP:NRC:1212

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

Sincerely,



E. E. Fitzpatrick  
Vice President

dr

Attachments

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, begin 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. 50-315/94002 (DRP) AND 50-316/94002 (DRP), 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 6th

day of May, 1994.

Rita D. Hill  
NOTARY PUBLIC

RITA D. HILL  
NOTARY PUBLIC, STATE OF OHIO  
MY COMMISSION EXPIRES 6-28-94

ATTACHMENT TO AEP:NRC:1212

REPLY TO NOTICE OF VIOLATION

### Background

A routine safety inspection was conducted by J. A. Isom, D. J. Hartland, C. N. Orsini, and G. D. Replogle from January 19 through March 11, 1994.

During this inspection, one item was found to be in violation. The violation was identified as procedural noncompliance and inappropriate procedure designation with regard to the maintenance performed on Unit 2 on February 21, 1994, on main steam stop valve dump valve 2-MRV-241.

This violation was set forth in a letter containing the notice of violation, dated April 6, 1994, from Mr. E. G. Greenman, Director, Division of Reactor Projects. The letter was received April 11, 1994. Our response to the notice of violation is contained within this document.

### NRC Violation I

"Criterion V of 10 CFR 50, Appendix B requires that activities affecting quality 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.

Procedure No. 12 IHP 6030.IMP.030, Revision 5, "Inspection & Adjustment of Pneumatic/Spring Valve Actuators & Associated Positioner & Limit Switches," documents the requirements for reassembling pneumatic valve actuators, including valve 2-MRV-241.

Plant Manager Instruction PMI-2010, Revision 23, "Instructions, Procedures and Associated Indexes Policy," Step 4.17.2, states that technical documents that are intended to be used by qualified individuals during the performance of an activity shall be designated in-hand as signified by double asterisks preceding the procedure number. Procedure No. 12 IHP 6030.IHP.030 is a technical document intended to be used by qualified individuals during the performance of an activity.

### Contrary to the above:

1. On February 21, 1994, maintenance work on main steam stop valve dump valve, 2-MRV-241, was not performed in accordance with procedure 12 IHP 6030.IMP.030, Revision 5, "Inspection & Adjustment of Pneumatic/Spring Valve Actuators & Associated Positioner & Limit Switches", in that the proper stroke length was not achieved.

2. Procedure 12 IHP 6030.IMP.030, Revision 5, was not developed in accordance with PMI-2010 in that the procedure was not designated In-Hand as signified by double asterisks preceding the procedure number. .

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

On February 21, 1994, corrective maintenance to repair leakby was performed on the Unit 2 main steam stop valve dump valve, 2-MRV-241. As part of this maintenance activity, valve 2-MRV-241 was to be set up and stroked. The set up and stroke set was performed without an in-hand procedure.

Plant Manager's Instruction, PMI-5020, "Corrective Maintenance" identifies the need to preplan work on safety-related equipment and to perform the work in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Upon review of the above maintenance activity, it has been concluded that the work involved in setting the correct stroke for this valve is too complex to be performed without an in-hand procedure. We failed to identify that inadequate instruction existed at the work site to perform the task in question.

3. Corrective Actions Taken and Results Achieved

Prior to unit startup, work activities were performed to correct the pre-load values of the valve. The bench set, with the actuator uncoupled from the valve, was verified to be correct for the required stroke length. The actuator was then properly coupled to the valve to achieve the required stroke length and pressure values. Testing was performed to verify proper operation, required stroke length, and required pressure values.

Procedure 12IHP6030.IMP.030 was enhanced and designated as an in-hand procedure.



4. Corrective Actions Taken to Avoid Further Violations

Maintenance will review the standards applicable to quality work, and re-evaluate their procedures currently designated as non-in-hand against these standards. There are 30 of these procedures. These 30 procedures will be revised, enhanced to contain appropriate levels of detail, and redesignated as in-hand procedures or canceled, as appropriate.

The maintenance screening process checklist, MA3.3-05, Attachment 5, was revised to clarify requirements for procedures at the work site.

Lessons learned from this event were shared with all other departments which perform maintenance work.

5. Date When Full Compliance Will Be Achieved

Maintenance administrative process MA3.3-05, Attachment 5 was revised April 27, 1994.

The "Lessons Learned" memo was issued May 6, 1994.

Procedure revisions and redesignation will be completed by July 1, 1994.

Full compliance was achieved on April 6, 1994, when procedure 12IHP6030.IMP.030 was revised and re-issued as an in-hand procedure.