

# INDIANA & MICHIGAN ELECTRIC COMPANY

P. O. BOX 18  
BOILING GREEN STATION  
NEW YORK, N. Y. 10004

September 25, 1981

AEP:NRC:0613

Donald C. Cook Nuclear Plant Unit Nos. 1 and  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
IE REPORT NOS. 50-315/81-13 and 50-316/81-16

Mr. James G. Keppler, Regional Director  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region III  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter responds to Mr. R. L. Spessard's letter of August 11, 1981 which transmitted the subject inspection reports. A two week extension to respond to the IE Report was granted on September 10, 1981 by your Mr. J. Neisler over the telephone.

Our responses to the Appendix A - Notice of Violation are given below in the same order as presented in Appendix A to Mr. Spessard's letter. Our response to the one item contained in the Appendix B - Notice of Violation is enclosed as separate attachment to this letter and is considered to be proprietary in accordance with 10 CFR 2.790. Therefore, it is requested that the attachment be withheld from public disclosure and not placed in the Public Document Room.

## RESPONSE TO APPENDIX A

1. A program has been developed to review each surveillance requirement assigned to the Operations Department. The review program includes:

- a) The development of specific actions required to assure proper surveillance in compliance with Technical Specification requirements.

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10 CFR 2.790(d) INFORMATION

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- b) Verification that the actions above are addressed in the applicable surveillance test procedures.
- c) Verification that the applicable procedures are scheduled at the proper frequency in the master surveillance test schedule.

This program is underway and full implementation is expected to be completed by April 1, 1982.

2a. On January 9, 1981, while performing surveillance tests on the essential service water (ESW) system, it was discovered that the ESW supply valve, WMO-754 to the east motor driven auxiliary feedpump would not seat properly. A job order was initiated to repair the valve and a condition report was written which identified the problem with the ESW supply valve. The condition report was classified as a Category "E" report which does not require a report to the NRC, since the condition of the valve was not reportable to the NRC.

Investigation of the valve problem by the Maintenance Department on January 9, 1981 revealed that the valve stem was bent and that the valve required replacing. To perform the work, the east motor driven auxiliary feedpump suction piping from the condensate storage tank had to be isolated, thus making the pump inoperable which was a reportable event.

The reason for this event not being reported as required was a "cause and effect" problem with the original condition report. The Operations Department did not issue an additional condition report when the auxiliary feedpump was made inoperable for the valve repair, thinking that the event would be included in the condition report on the ESW valve. The Maintenance Department assumed that a condition report would be initiated when the pump was made inoperable for the valve repair.

Investigation of the condition report concerning the ESW valve was not completed within 30 days and since the inoperability of the auxiliary feedpump was not reported via a separate condition report, a Licensee Event Report was not submitted within 30 days as required by the Technical Specifications. Subsequently, when the condition report concerning the ESW valve was investigated, the need to submit a Licensee Event Report because of the motor driven auxiliary feedpump inoperability was identified and brought to the attention of Plant Management. That condition report was reclassified as a Category "C" report, to include reporting of the motor driven auxiliary feedpump inoperability. A Licensee Event Report was then prepared and submitted.

The requirements for initiating and upgrading Condition Reports were discussed with the two Department Heads involved. Full compliance with reporting requirements has been achieved.

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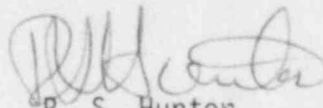
2b. An investigation of this event indicated that the responsible test engineer for the Unit 1 July, 1980 program verbally reported the excessive leakage to his immediate supervisor. Although the supervisor in question is no longer employed by Indiana & Michigan Electric Company and could not be questioned, it is believed that his failure to report the occurrence was a personal oversight.

To prevent the reoccurrence of this incident, Procedure 12 THP 4030 STP.203 entitled "Surveillance Test Procedure, Type B&C Leak Rate Test" was revised to incorporate a statement requiring a report to management per Procedure PMP 7030 RPT entitled "Condition Reports", if the measured total B&C Leak Rate exceeds 0.6 La.

RESPONSE TO IE REPORT PARAGRAPH 3, ENTITLED "ORDER FOR MODIFICATION OF LICENSES CONCERNING PRIMARY COOLANT SYSTEM PRESSURE ISOLATION VALVES"

In this paragraph, there exists an apparent discrepancy between the NRC inspectors' reference to the Franklin Research Center technical evaluation report correction factors for periodic leak testing of valves in the WASH 1400 Event V configuration. The leakage correction criteria referenced in Procedure 12 THP 4030 STP.226 is found in ASME Section XI, Paragraph IWV-3420(s), and is identical to the criteria found in the Franklin Research Center report. To confirm this, Mr. K. I. Baron of the ASME was contacted and he indicated that the equation used in the Donald C. Cook Nuclear Plant procedure was correct and, in fact, that ASME had performed testing to confirm the validity of the equation. Mr. Baron also stated that he would present the question of interpretation to the ASME Section XI Committee Chairman (ASME File #BC-B2-410) for final resolution. Indiana & Michigan Electric Company's position is that unless the ASME Section XI Committee finds differently the correction factors used in 12 THP 4030 STP.226 will remain unchanged.

Very truly yours,

  
R. S. Hunter  
Vice President

/emc

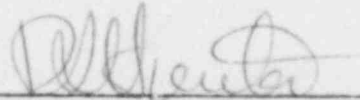
cc: John E. Dolan - Columbus  
R. C. Callen  
G. Charnoff  
R. W. Jurgensen  
D. V. Shaller - Bridgman  
Joe Williams, Jr.  
NRC Region III Resident Inspector - Bridgman

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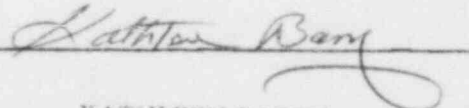
STATE OF NEW YORK )  
COUNTY OF NEW YORK )

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R. S. Hunter, being duly sworn, deposes and says that he is the Vice President of Licensee Indiana & Michigan Electric Company, that he has read the foregoing response on the matter of Appendix A and Appendix B, Notices of Violation to R. L. Spessard's letter of August 11, 1981, and IE Inspection Reports No. 50-315/81-13; 50-316/81-16, and knows the contents thereof; and that said response contents are true to the best of his knowledge and belief.



Subscribed and sworn to before me this 25<sup>th</sup> day of September, 1981



KATHLEEN BARRY  
NOTARY PUBLIC, State of New York  
No. 41-606792  
Qualified in Queens County  
Certificate filed in New York County  
Commission expires March 30, 1983

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