

INDIANA & MICHIGAN ELECTRIC COMPANY

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

May 12, 1982
AEP:NRC:00682

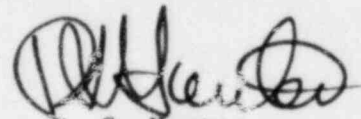
Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
IE REPORT NOS. 50-315/82-04; 50-316/82-04

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

Dear Mr. Keppler:

The attachment to this letter provides our response to the Notice of Violation contained in the Appendix to IE Inspection Report Nos. 50-315/82-04; 50-316/82-04 transmitted to us in Mr. R. L. Spessard's letter of April 1, 1982.

Very truly yours,



E. S. Hunter
Vice President

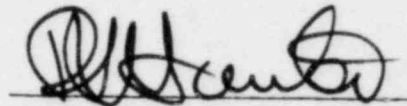
RSH/os

cc: John E. Dolan - Columbus
R. W. Jurgensen
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
Joe Williams, Jr.
NRC Resident Inspector at Cook Plant - Bridgman

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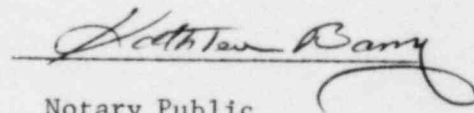
STATE OF NEW YORK)
COUNTY OF NEW YORK)

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 to the Notice of Violation contained in the Appendix to IE Inspection Report Nos. 50-315/82-04; 50-316/82-04 and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.



R. S. Hunter

Subscribed and sworn to before me this 13th day of May 1982, ~~1982~~



Notary Public

KATHLEEN BARRY
NOTARY PUBLIC, State of New York
No. 41-6006792
Qualified in Queens County
Certificate filed in New York County
Commission expires March 30, 1983

Response to the Notice of Violation

Response to Item 1

In the past, Indiana & Michigan Electric Company (I&MECo.) has not interpreted 10 CFR 50, Appendix B, Criteria V and VII as being applicable to suppliers of test equipment calibration services. Based on our understanding that it is common practice throughout the nuclear industry to require that vendors for calibration services be on an approved suppliers list or, as a minimum, require Quality Assurance personnel to observe the calibration process at the vendor's facility and despite the lack of explicit requirements in Appendix B, I&MECo. believes it to be a prudent course of action to require placement of calibration service vendors on an approved suppliers list. Actions have already been initiated to affect such measures. Details of the action already taken and further actions planned are given below.

Corrective Action Taken

Effective April 1, 1982, suppliers of calibration services for test equipment utilized on safety related systems will be required to be on the Cook Plant Qualified Suppliers List (QSL). These suppliers are being added to the QSL on an "as-needed" priority basis with a target date of December 31, 1982, for having all of these suppliers on the QSL. In addition, effective immediately, procurement documents for calibration services will bear a special designation (QA-C) and the statement, "The calibration services being ordered shall be furnished under a QA Program previously approved by the buyer."

I&MECo. agrees with that portion of the Violation pertaining to the lack of "as found" data on test equipment calibrated by offsite suppliers. To prevent recurrence of this situation, on March 12, 1982, form letters utilized for transmittal of all test equipment to offsite calibration suppliers were revised to require the supplier to furnish "as found/as left" data.

Date of Compliance

It is projected that all currently identified suppliers who perform calibration services for test equipment will be placed on the Qualified Suppliers List by December 31, 1982. As indicated above, form letters addressing the lack of "as found" data were revised on March 12, 1982.

Response to Item 2

Corrective Action Taken

The hydrostatic test was being conducted using the fire protection system as the pressure source. Due to the relatively small difference between the pressure of the fire protection system and the required test pressure, installation of a safety valve was considered unnecessary. However, the use of a safety valve set to relieve pressure at 1.10 times the hydrostatic test pressure is a requirement of the procedure.

The following actions were taken immediately:

- 1) A second hydrostatic test of the same line was conducted in strict accordance with the procedure in order to emphasize to all personnel involved the need for complying with all procedural requirements.
- 2) An engineering evaluation was conducted and it was determined that the pressure exerted on the piping during the initial hydrostatic test did not overstress the components.

The following actions were also taken:

- 1) The item of noncompliance was discussed with the Maintenance personnel and the QC Inspector involved, and the Maintenance Supervisor responsible for conducting the test. The procedural requirement and the need for adhering to the procedure were emphasized.
- 2) Training sessions were conducted with all Maintenance Supervisors and Maintenance Mechanic "A" welders. The topic of the training sessions was Hydrostatic Test Procedure No. **12 HMP 5050.SPC.005.
- 3) The QC Supervisor met with all QC Technicians and reviewed the D. C. Cook Nuclear Plant's policy on procedure adherence as defined by PHL-2010 entitled "Plant Manager and Department Head Instructions, Procedures and Associated Indexes." Hydrostatic Test Procedure No. **12 HMP 5050.SPC.005 was also reviewed with all QC Technicians with emphasis on the importance of evaluating the data obtained during a test or plant evaluation against the criteria established or required by a test or procedure prior to acceptance and signoff.

Action Taken or Planned to Avoid Further Noncompliance

The corrective actions already taken should be sufficient to prevent further noncompliance.

Date of Compliance

Full compliance has been achieved.

Response to Item 3

Corrective Action Taken

The Design Control Program delineated by Plant Manager Instruction PMI 5040, is presently under review to identify and resolve impediments associated with its implementation.

The Plant's policy on this matter fully supports the Criteria established by 10 CFR 50, Appendix B, relative to Design Changes and applicable industry standards in requiring that procedures and drawings which are affected by a change in design be revised and issued prior to operation of the associated system.

Action Taken or Planned to Avoid Further Noncompliance

To insure that all cognizant individuals are aware of their responsibilities in adhering to these requirements, the Plant Manager on March 19, 1982, and at subsequent staff meetings, verbally advised members of his staff that any deviations from this policy be referred to management's attention for evaluation and direction. This requirement will remain in effect until such time as the Design Control Program review is completed and the results appropriately incorporated into PMI 5040.

Date of Compliance

The actions already taken are sufficient to prevent further noncompliance in the interim period pending completion of the Design Control Program review and modification, if necessary, of PMI-5040.