

# INDIANA & MICHIGAN ELECTRIC COMPANY

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

June 6, 1983  
AEP:NRC:0816

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 INSPECTION REPORTS NO. 50/315/83-04 (DPRP)  
and No. 50-316/83-05 (DPRP)

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

Dear Mr. Keppler:

This letter responds to Mr. D. W. Shafer's letter of May 6, 1983, which forwarded to us the subject Inspection Reports.

The Notice of Violation attached to Mr. Shafer's letter identified two Items of Violation requiring a written response. A re-statement of the Items and our response to them follows.

Item No. 1.

The action requirements of Unit 2 Technical Specification 3.3.3.8 state in part: "With the number of OPERABLE fire detection instruments less than required by Table 3.3-11:

1. Within 1 hour, establish a fire watch patrol to inspect the zone(s) with the inoperable instrument(s) at least once per hour..."

Contrary to the above, on February 24, 1983, a fire patrol watch was established in one hour and twenty minutes instead of one hour when it was identified that, due to a missed surveillance, the number of operable fire detection instruments was less than required in Table 3.3-11.

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

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Item No. 2.

Unit 2 Technical Specification 4.0.2 states in part: "Each surveillance requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval..."

Unit 2 Technical Specification 4.3.3.8.1 states: "Each of the above fire detection instruments shall be demonstrated OPERABLE at least once per six months by performance of a CHANNEL FUNCTIONAL TEST."

Contrary to the above, on February 24, 1983, it was discovered that the containment cable tray thermisters were not demonstrated operable by a channel functional test for a period in excess of 6 months plus the 25% extension. The surveillance became overdue on January 27, 1983, when the extension period ended.

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

Response to Items No. 1 and No. 2

Investigation of the event has revealed that the cause of the missed surveillance was personnel error. The responsible supervisor did not ensure that the testing was completed as assigned.

Upon discovery of the missed surveillance, the Technical Specifications were reviewed for the action requirements by non-licensed supervisory personnel. The action statement required a fire watch inside containment. Since the containment was inaccessible, it was incorrectly judged that the only required response was to immediately complete the surveillance.

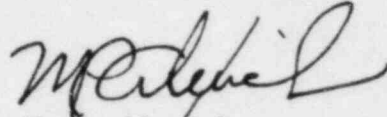
When licensed personnel were notified a fire watch was established using Closed Circuit TV one hour and twenty minutes after identification of the missed surveillance. The surveillance test was also satisfactorily completed on February 24, 1983 and the fire detection system returned to service.

The Nuclear Testing Scheduling (NTS) computer program has been updated to include all control and instrument surveillance tests. The Control and Instrument Group is now able to use the NTS program to verify routine surveillance testing. Additionally, the Plant Manager Standing Order entitled "Incomplete or Missed Technical Specification Surveillance Requirements" has been reviewed with the Control and Instrument Supervisory Personnel.

This event was reported to the NRC on March 10, 1983 in LER No. 50-316/83-26.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'M. P. Alexich', written in a cursive style.

M. P. Alexich  
Vice President

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