

# INDIANA & MICHIGAN ELECTRIC COMPANY

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January 10, 1984  
AEP:NRC:0859

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
NRC Inspection Report 83-16/83-17(DPRP)

Mr. James G. Keppler  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter is in response to Mr. W. D. Shafer's letter dated November 23, 1983, which forwarded the subject Inspection Report of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant during the period September 10 through October 20, 1983. The Notice of Violation attached to Mr. Shafer's letter identified two (2) items of noncompliance. Per Mr. P. A. Barrett's conversation with Mr. M. Holzmer on December 22, 1983, an extension to January 10, 1984 was granted to us to complete our responses to these items. Our responses to these items are presented below.

## Item 1 (Unit 1)

"Unit 1 Technical Specification 3.9.7 states: 'Loads in excess of 2500 pounds shall be prohibited from travel over fuel assemblies in the storage pool. Loads carried over the spent fuel pool and heights at which they may be carried over racks containing fuel shall be limited in such a way as to preclude impact energies over 24,240 in.-lbs., if the loads are dropped from the crane.' Procedure 12 MHE5021.001.036 implements Specification 3.9.7 and requires that heavy loads be transported only over color coded safe load zones.

Contrary to the above, on September 29, 1983 a 55 ton shield block was transported outside the designated safe load zone."

## RESPONSE TO ITEM 1

### 1. CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

One of the concrete shield blocks was moved above an area not included within the safe load path boundaries, in violation of the procedure. The individuals supervising the activity were aware of the procedural requirements. Because of minor difficulties

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encountered, the shield block was transported above an area adjacent to the Spent Fuel Pit which was not included within the safe load path boundaries in order to expedite job completion. The NRC Senior Resident Inspector observed the activity and informed appropriate Plant Management. The responsible individuals were directed to complete the movement of the remaining shield blocks in accordance with the procedure requirements. All subsequent movements of shield blocks were conducted within the safe load path boundaries.

2. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The Civil Construction Department Head reinstructed the responsible individuals in the proper use of established procedures. Compliance with all procedural requirements was stressed. A contributing factor to this occurrence was that the current hook was not easily swivelled. A design change (RFC-DC-1953) has been initiated to correct this situation.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved. Compliance with the established procedures is not dependent upon RFC-DC-1953.

ITEM 2 (Unit 2)

"Unit 2 Technical Specification 6.8.1.c states: 'Written procedures shall be established, implemented and maintained covering the ...surveillance and test activities of safety related equipment....' To comply with Technical Specification Surveillance 4.5.4.1, procedure 12 THP 6020.LAB.037 'Techniques of Liquid Sampling' specifies that to sample the Boron Injection Tank (BIT) for boron concentration, sample valve SI-131 be opened and then closed after flushing and drawing the sample.

- a. Contrary to the above on September 26, 1983, the sample valve was not closed following sampling of the BIT thereby degrading the operability of the system.
- b. Contrary to the above, the sampling of the BIT requires operation of two valves, SI-131 and SI-209, and procedure 12 THP6020LAB.037 does not address operation of the valve SI-209."

RESPONSE TO ITEM 2.a.

1. CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The technician who left the BIT sample valve open was removed from the technician shift rotation and given duties that did not require sampling any safety related systems. This technician was also placed into a requalification program for retraining in her job classification.

2. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

This sample point in particular and all sample points on safety related equipment (or equipment vital to the plant or plant safety) are now monitored by a program of double valve verification by two individuals.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

RESPONSE TO ITEM 2.b.

1. CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The procedure covering sampling of the boron injection tank was changed to reflect the extra valve present on Unit 2.

2. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

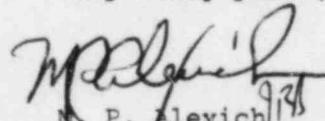
A senior technician evaluated all our sampling procedures to insure the physical work being done and the written procedure steps were identical.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

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

Very truly yours,

  
N. P. Alexich  
Vice President

MPA/pb

cc: John E. Dolan  
W. G. Smith, Jr. - Bridgman  
R. C. Callen  
G. Charnoff  
E. R. Swanson, NRC Resident Inspector - Bridgman