

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

May 4, 1984

AEP:NRC:0883

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 Report Nos. 50-315/84-02 (DPRP); 50-316/84-02 (DPRP)

Mr. James G. Keppler, Regional Administrator
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 50137

Dear Mr. Keppler:

This letter responds to Mr. W. D. Shafer's letter dated April 5, 1984, 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 January 21, 1984 through March 12, 1984. The Notice of Violation attached to Mr. Shafer's letter identified one (1) item of noncompliance. Our response is as follows:

ITEM OF NONCOMPLIANCE

Unit 2 Technical Specification 6.8.1.c requires implementation of written procedures for surveillance and test activities of safety related equipment. Procedure 12 THP 4030 STP.207 "Ice Condenser Lower Inlet Doors" at paragraph 3.1.1, requires use of a calibrated scale with a range of 0-10 pounds and accuracy of 0.1 pounds when determining the door opening and closing force.

Contrary to the above, on October 5, 1981 the test was performed with a 0-20 pound scale and on August 22, 1983 the test was performed with a 0-40 pound scale.

This is a Severity Level V violation (Supplement 1).

RESPONSE TO ITEM OF NONCOMPLIANCE

1. Corrective Action Taken and Results Achieved

Indiana & Michigan Electric Company agrees with the stated violation. Several discussions have been conducted with all Performance Engineering personnel to reinforce Plant and Departmental Policies concerning the importance of following

8405210159 840515
PDR ADDCK 05000315
G PDR

MAY 7 1984

procedures and the use of temporary change sheets. These topics are also included in the Performance Section's New Employee and Annual Training Programs.

A review of the scales used for the reference tests was completed. The review indicated the scales used were calibrated with an accuracy of 0.1 pounds, the same accuracy as the 0-10 pound scale required by 12 THP 4030 STP.207.

However, the graduations on the 0-20 pound and 0-40 pound scales are different from the 0-10 pound scale. This difference in graduations could have resulted in slight errors in calculating the opening and closing force of each door. The 0-10 pound scale has 0.125 pound graduations. The 0-20 pound scale has 0.25 pound graduations and the 0-40 scale has 0.5 pound graduations. By using the wrong scale the following errors were possible:

Oct. 1981 test, 0-20 pound scale used

$$(0.25 - 0.125) \times 27 = 3.375 \text{ in-lbs}$$

0.25 - graduation of 0-20 lb scale
0.125 - graduation of 0-10 lb scale
27 in - lever arm length

3.375 in-lb = possible error from using incorrect scale.

The maximum torque reading found during test was 159.7 in-lb. With the added possible error of 3.375 in-lb, the opening torque would still be below the acceptance criteria of 195 in-lb.

Aug. 1983 test, 0-40 pound scale used

$$(0.5 - 0.125) \times 27 = 10.125 \text{ in-lbs}$$

0.5 - graduation of 0-40 lb scale
0.125 - graduation of 0-10 lb scale
27 in - lever arm length

10.125 in-lbs = possible error from using incorrect scale.

The maximum torque reading found during the test was 144.0 in-lb. With the added possible error of 10.125 in-lb, the opening torque would still be below the acceptance criteria of 195 in-lb.

The possible errors in both events would not have resulted in exceeding the acceptance criteria for 12 THP 4030 STP.207.

2. Corrective Action Taken to Avoid Further Noncompliance

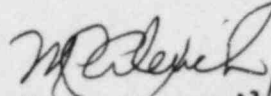
This event was reviewed with all Performance Section personnel. The requirements of using the specified test instruments as stated in Plant procedures was also reemphasized.

3. Date When Full Compliance Will Be Achieved

Full compliance has been achieved through the existing administrative policies and procedures and current training programs.

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,


M. P. Alexich ^{PM}
Vice President 9/4/84

MPA/cm

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