

INDIANA & MICHIGAN ELECTRIC COMPANY

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March 2, 1984
AEP:NRC:0877

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 Nos. 50-315/83-21(DPRP);
50-316/83-22 (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 February 3, 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 December 11, 1983 to January 20, 1984. The Notice of Violation attached to Mr. Shafer's letter identified one item of noncompliance. Our response to this item is presented below:

Item of Noncompliance (Units 1 and 2)

Units 1 and 2 Technical Specification 3.7.9.4.a allows 14 days to return an inoperable Halon System to operable status or, submit a special report to the Commission within 30 days outlining the actions taken, the cause of the inoperability and the plans and schedule for returning the system to operable status.

Contrary to the above, when the Halon System was declared inoperable on April 5, 1983 (Unit 1) and April 14, 1983 (Unit 2) and not returned to service within 14 days a special report providing the requested information was not submitted.

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

RESPONSE TO ITEM OF NONCOMPLIANCE

1. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The following constitutes the Special Report, pursuant to Technical Specification 6.9.2. The halon systems were declared inoperable because they were unable to meet design concentration of 5% halon after 10 minutes. The fire detection system and the backup CO₂ fire suppression system were then verified to be operable. To date, repairs and

subsequent concentration tests have failed to demonstrate the ability to meet the design concentration. The piping and nozzles have been checked to ensure they are not blocked. Additional testing has been conducted with an increased quantity of halon (6½% vs 5%) discharged into the vault. The system still failed to maintain the design concentration. American Electric Power Service Corporation is currently studying the problem in conjunction with a consultant. The consultant, a halon system supplier, has made recommendations in the form of a proposal which is currently under evaluation. A second consultant will be at the site in March, 1984 to review the conditions and to try to develop a possible solution to the problem. These activities will be discussed with American Nuclear Insurers (our fire hazards insurance agency) and a course of action will be established.

2. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER NONCOMPLIANCE

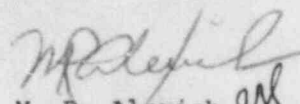
The cause for not submitting the Special Report within 30 days, was a lack of interface control between AEPSC and the Plant for situations when Technical Specification reporting responsibilities are transferred from the Plant to AEPSC. We are presently establishing an interface procedure between AEPSC and the Plant. This procedure will require the Plant to formally request, via the Nuclear Engineering Division, all transfers of responsibilities related to Technical Specification reporting requirements. The Nuclear Engineering Division will then have the responsibility of assuring the reporting requirements are fulfilled on a timely basis.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance with Technical Specifications 3.7.9.4.a and 6.9.2 has been achieved. However, establishment of the interface procedure is yet to be completed. The procedure is scheduled for completion at the end of May, 1984.

This document was 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
Vice President

MPA/cm

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