

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

June 22, 1984

AEP:NRC:0891

Donald C. Cook Nuclear Unit Nos. 1 and 2
Docket Nos. 50-315 and 5-316
License Nos. DPR-58 and DPR-74
NRC Report Nos. 50-315/84-06 (DPRP) and 50-316/84-06 (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 May 11, 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 March 13 through April 30, 1984. The Notice of Violation attached to Mr. Shafer's letter identified two (2) items of noncompliance. Our response is as follows:

ITEM OF NONCOMPLIANCE

Unit 2 Technical Specification 3.7.10 requires all fire barriers protecting safety related areas be functional or establish a continuous firewatch on at least one side of the nonfunctional barrier.

Contrary to the above fire barrier W-7975 located in the Unit 2 Boron Injection Tank (BIT) room, was nonfunctional for an unknown period of time without a continuous firewatch being established.

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

RESPONSE TO ITEM OF NONCOMPLIANCE

1. Admission or Denial of the Alleged Violation

We concur the violation occurred as stated.

2. Cause Description

8407120338 840706
PDR ADOCK 05000315
Q PDR

A search of work records by both the Maintenance Department and the I&M Construction Department failed to reveal the reason for the break of the fire barrier penetration seal No. W-79/5 and when it might have occurred. The cause of this situation is personnel error since the hole should have been filled immediately after it was determined that it was not to be used or possibly made in the wrong location.

JUN 25 1984

3. Immediate Corrective Action

A continuous fire watch was established within approximately 15 minutes of notification of the breach of the fire barrier and was maintained until the hole was temporarily repaired per approved procedure.

4. Corrective Action Taken to Prevent Further Non-Compliance

Requirements for maintaining fire barrier penetrations (doors, fire dampers, cable and piping penetration) operable are included in the General Employee Training Program video tapes. The violation has been discussed with I&M Maintenance and Construction supervisory personnel. To reinforce these requirements, personnel involved with this type of work will be reinstructed on a periodic basis.

5. Date of Full Compliance

Full compliance with the Technical Specification requirements was achieved within 15 minutes of discovery when the continuous fire watch was established. Permanent repairs of the seal were performed on June 4, 1984.

ITEM OF NONCOMPLIANCE

Units 1 and 2 Technical Specification 6.8.1 requires that procedures be implemented and maintained to control surveillance and test activities of safety related equipment.

Technical Specification 6.8.3 allows temporary changes to the procedures of 6.8.1 provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license on the unit affected.

Contrary to the above, the surveillance procedures used to demonstrate operability of two radiation monitors (ERS-1400 and ERS-2400) which provide a Containment Ventilation Isolation (CVI) function were improperly changed when:

- a. Procedure 1-THP 4030 STP.093 had a temporary change approved which did not include testing of three of thirteen functions when performed on July 24, 1982.
- b. Procedure 1-THP 4030 STP.193 had unauthorized changes made which omitted testing three of thirteen CVI functions by noting that tagging of components interfered.

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

RESPONSE TO ITEM OF NONCOMPLIANCE1. Licensee Position

We concur the instances occurred as stated. Although the required testing was eventually completed, the followup which ensured this was informal and not evident in the guiding procedure.

2. Cause Description

This occurrence reflects an operational philosophy, in place during that period of time, which relied heavily on personal responsibility and followup, and the Mode Change Surveillance Test Procedure discipline - which was in fact given to this particular work and testing due to the complexity of the work and the associated Technical Specification requirement in effect during this modification, without the necessary attention to detail to ensure that the procedural record provided a clear trail of documented completion of all aspects of the work and testing.

3. Immediate Corrective Action Taken

1. Investigated to ensure the necessary functional testing was performed prior to changing to an Operational Mode when the equipment had to be in unrestricted operational status.
2. The Chairman of the Plant Nuclear Safety Review Committee Subcommittee on Procedures issued instructions to that Subcommittee that their charter included the critical review of procedure changes for the quality of and necessity for the change. (This informal action is being followed by a formal change to the Plant procedure governing this activity, which will be effected by July 20, 1984.)

4. Corrective Action Taken to Prevent Further Non-Compliance

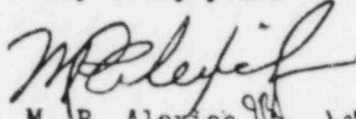
In addition to the actions taken above, a letter from the Plant Manager to all Plant Supervisors, addressing the topics of procedural adherence and considerations required when changing procedures was issued on June 22, 1984. These issues will receive continuous attention and reinforcement through training and the attention of the Plant Safety Committee.

5. Date of Full Compliance

Full compliance was achieved by the action that has already been taken. Immediate corrective action, Item 3.2, will be formalized by a procedural change to be completed by July 20, 1984.

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 9/24
Vice President 6/22/84

th

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