



April 18, 1997

AEP:NRC:1238A2
10 CFR 2.201

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

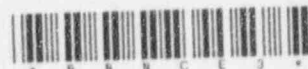
Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
NRC INSPECTION REPORTS NO. 50-315/316-96004 (DRP)
REPLY TO NOTICE OF VIOLATION
REQUEST FOR ADDITIONAL INFORMATION

By letter dated June 28, 1996 (AEP:NRC:1238A), we provided our response to a letter from W. J. Kropp dated May 16, 1996, that forwarded two violations to Indiana Michigan Power Company. The first of the two violations was associated with changing the intent of two plant procedures without the required safety reviews being performed. As requested in the violation, our response was to delineate the steps taken to ensure that no operational direction would be provided to operators, outside of the operating procedures, when utilizing plant manager instruction (PMI)-4090, "Criteria for Conducting Infrequently Performed Tests or Evolutions." Subsequently, during the exit meeting for inspection report 50-315/316-96014, the senior resident inspector requested that we provide additional information regarding more generic actions we have taken to ensure changes to the intent of a procedure not be implemented without prior performance of a safety evaluation.

Our response to the senior resident's request, contained in our letter AEP:NRC:1238A1, dated February 17, 1997, was that during the investigation into the subject violation, we determined the existing plant guidance on procedure intent was vague. Based on this, procedure PMI-2010, "Instructions, Procedures, and Associated Indexes Policy," was revised to clearly define "change of intent". The "change of intent" definition added to the procedure was based on industry input and describes conditions under which the intent of a procedure is changed. The definition provides a clear foundation to segregate procedure revisions into intent and non-intent changes, thereby providing assurance that procedure intent changes have safety evaluations performed prior to implementation.

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Following receipt of our supplemental letter, AEP:NRC:1238A1, the senior resident inspector indicated that further information would be necessary to close out the subject violation. The additional information has been provided in the attachment to this letter.

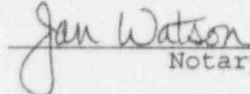
Sincerely,



E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 18th DAY OF April, 1997



Notary Public

My Commission Expires _____

JAN WATSON

NOTARY PUBLIC, BERRIEN COUNTY, MI
MY COMMISSION EXPIRES FEB. 10, 1999

vlb

Attachment

cc: A. A. Blind
A. B. Beach
MDEQ - DW & RPD
NRC Resident Inspector
J. R. Padgett

ATTACHMENT TO AEP:NRC:1238A2

REPLY TO NOTICE OF VIOLATION: NRC
INSPECTION REPORT NOS. 50-315/96004 (DRP)
AND 50-316/96004 (DRP)

REQUEST FOR ADDITIONAL INFORMATION

This attachment provides additional information relative to actions taken in response to the following violation from NRC inspection report 50-315/316-96004.

NRC Violation 1

"Technical Specification 6.5.3.1 states that procedures required by Technical Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed, and approved. It further states that temporary changes that do (not) change the intent of the approved procedure can be approved by two members of the plant staff, with at least one individual holding a senior reactor operator license, and allows the safety review to determine if an unreviewed safety question exists to be conducted (up to) 14 days after implementation of the change.

Technical Specification 6.5.3.1.e states that each review shall include a determination of whether or not an unreviewed safety question is involved.

Contrary to the above, on March 22, 1996, the licensee utilized the temporary change process and did not perform a safety review prior to issuing the following changes to procedures that changed the intent of the approved procedure.

- a) Change Sheet 2 to procedure 02-OHP 4021.001.003, "Power Reduction," was issued to revise the method of a planned reactor shutdown from an orderly reactor shutdown from power to a manual reactor trip from a power level that would result in the automatic starting of engineered safety feature equipment (ESF).
- b) Change Sheet 1 to surveillance procedure 02-OHP 4030.STP.026, "Auxiliary Power Transfer Test Surveillance Procedure," Revision 5, revised when to perform the TS surveillance. Instead of performing the surveillance when the reactor was shutdown (Mode 5 or 6), the revision allowed the surveillance to be performed at power (Mode 1) using an actual ESF actuation (reactor trip).

This is a Severity Level IV violation (Supplement I). (50-316/96004-01)"

Note: Items in parenthesis indicate minor changes to original notice of violation (NOV) text for purposes of clarification.

Additional Information

The following is from AEP:NRC:1238A1:

"During the investigation into the subject violation, we determined the existing plant guidance on procedure intent was vague. Based on this, procedure PMI-2010, "Instructions, Procedures, and Associated Indexes Policy," was revised to clearly define "change of intent." The "change of intent" definition added to the procedure was based on industry input and describes conditions under which the intent of a procedure is changed. The definition provides a clear foundation to segregate procedure revisions into intent and non-intent changes, thereby providing assurance that safety reviews are performed when required."

The following provides details on actions taken and plant impact in the development and approval of the "change of intent" definition.

1. NOV Investigation and "Change of Intent" Definition

Our investigation into the violation was conducted by a task force consisting of members from operations, maintenance, engineering and performance assurance. The initial phase of the investigation focused on examining how "procedure intent" was defined for procedure changes. The task force concluded that the existing plant guidance for procedure intent was ambiguous, thereby allowing too much room for interpretation.

The task force obtained a list of plant contacts recognized as having good processes addressing procedure adherence/intent issues. The task force posed the following questions to each of the industry contacts:

"What is your plant's definition for procedural intent?" and,

"How does your plant screen proposed procedural changes to determine if they would alter procedural intent?"

The industry contacts responded by providing the task force with various "change of intent" procedure screening tools. The types of tools provided were various checklists, flowcharts and definitions being used to screen proposed changes as potentially altering procedure intent.

The task force compiled all of the procedure screening tools and extracted the items that were being used at the majority of the sites, as well as the strongest and most relevant elements of the various procedure intent programs. The team then collated these items and created a proposed definition for procedure intent.

The task force proposed the following criteria to evaluate a change for "change of intent":

A change that deletes or less conservatively modifies one or more of the following items constitutes a change to the intent of a procedure:

- Initial conditions
- Acceptance criteria that affects equipment operability or alters test results
- A known commitment
- Provisions for personnel or equipment safety

A change to one or more of the following items that redefines the limits of intended use constitutes a change to the intent of the procedure:

- The stated purpose or objective
- Major activity(ies)
- Operating mode(s)
- Range(s) or limit(s) of equipment or system operation

With the above proposed definition in place and disallowing use of plant manager instructions (PMIs) and plant manager

procedures (PMPs) to direct operational activities, the procedure changes cited in the notice of violation would not have been approved without a safety evaluation being performed.

Management concurred with the proposed definition on June 27, 1996, with the approval of the condition report response the task force had prepared.

2. Management Expectations and Communication to Plant Personnel

On July 20, 1996, an e-mail was issued to plant superintendents and the operations staff from the operations superintendent providing interim guidance for defining the term procedure "intent". The guidance was as follows:

"As interim guidance for defining the term: Procedure "Intent" please refer to the following. This draft definition is the collective product from several of our plant procedure people working together to create this definition. Plans are now to formally incorporate this into PMI-2010 by mid-September this year.

Please pass this along to those members of your staff that prepare procedure changes so they can begin to apply this definition immediately. In short, any procedure change that falls into one of the following areas must be "Revised" rather than be placed into effect by an SRO signature on a change sheet.

I am advising the SROs to apply this definition to those procedures that are presented to them for approval immediately. In cases where this definition is vague, please apply our Conservative Decision Making principles.

Draft Definition of Intent:

Procedure Intent - The intent of a procedure is to meet the procedure's objective in a safe and prescribed manner within established limits.

A change that deletes or less conservatively modifies one or more of the following items constitutes a change to the intent of a procedure:

- Initial conditions
- Acceptance criteria that affects equipment operability or alters test results
- A known commitment
- Provisions for personnel or equipment safety

A change to one or more of the following items that redefines the limits of intended use constitutes a change to the intent of the procedure:

- The stated purpose or objective

- Major activity(ies)
- Operating mode(s)
- Range(s) or limit(s) of equipment or system operation"

This guidance was identical to the proposed wording presented by the task force described above in section 1. Superintendents, in turn, distributed the information to the appropriate personnel within their departments.

The above e-mail was printed, copied and placed in the shift supervisor's office as well as both control rooms for reference.

Following issuance of the guidance, the operations superintendent was contacted on several occasions by individuals wanting to ensure they were following the appropriate change method. Additionally, several requests for senior reactor operator signature were rejected. This resulted in procedures being revised under the normal revision process. The revision process calls for a safety evaluation prior to implementation.

To reinforce and clarify management expectations, the operations superintendent met with several of the operations shifts during their training period. In addition, lessons learned were discussed at the 0830 hours operations meeting to further disseminate management expectations within the operations department.

3. PMI-2010 Revision

On September 1, 1996, PMI-2010, "Instructions, Procedures, and Associated Indexes Policy," was revised to incorporate the change of intent definition. The definition was revised slightly from the task force proposed definition to recognize previously approved changes. The final definition incorporated into PMI-2010 is as follows:

"Change of Intent -

A change that deletes or less conservatively modifies one or more of the following items constitutes a change to the intent of a procedure:

- Initial conditions
- Acceptance criteria that affects equipment operability or alters test results*
- A known commitment
- Provisions for personnel or equipment safety

A change to one or more of the following items that redefines the limits of intended use constitutes a change to the intent of the procedure:

- The stated purpose or objective
 - Major activity(ies)
 - Operating mode(s)
 - Range(s) or limit(s) of equipment or system operation*
- * NOTE: These are not changes to intent if the procedure is being revised in response to a previously approved change (e.g. design changes)."

Following issuance of the procedure change, training was conducted throughout the plant to appropriate personnel on the definition.

To facilitate application of the definition, desk aids were provided to the shift supervisor's office and control rooms. The desk aids consisted of large print definitions of "intent" as defined by the procedure.