UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 21, 1979

Docket No. 50-315 and 316

LICENSEE: Indiana and Michigan Power Company

FACILITY: Donald C. Cook, Nuclear Plants Units 1 and 2

SUBJECT: SUMMARY OF NOVEMBER 15, 1979 PHONE CONVERSATION REGARDING LESSONS LEARNED IMPLEMENTATION

During a phone conversation on November 15, 1979 the NRC Lessons Learned Implementation Team discussed with the licensee, its October 24, 1979 response to our September 13, 1979 letter.

The team informed the licensee of those lessons learned items for which the licensee's proposed schedule for implementation is unacceptable. These items, along with the proposed and required completion dates, are listed in Enclosure 1.

The team also informed the licensee of those items for which further clafification of the licensee's commitment is necessary to demonstrate compliance with the lessons learned requirements. These items and the associated team questions are listed in Enclosure 2.

Items 2.1.3.6 (Instrumentation for Detection of Inadequate Core Cooling) (Procedures only), 2.1.7.a (AFW Initiation), 2/1/7/6 (AFW Flow), and 2.1.9 (Accident and Transient Analysis) were not discussed since these items are being implemented by the Bulletins and Orders Task Force.

Dave Wigginton, Project Manager
Operating Reactors Branch #1
Division of Operating Reactors

Enclosure (2):
As Stated

cc w/enclosures: See next page

Memo

ENCLOSURE 1

ITEMS THAT DO NOT MEET LESSONS LEARNED
IMPLEMENTATION SCHEDULE

1. SECTION 2.1.3.a - Direct Valve Position Indication

   Guidance in the October 30, 1979 letter should be followed on implementation of this requirement by January 1, 1980 instead of the proposal to install during the first suitable outage.

2. SECTION 2.1.3 (b) - Instrumentation for Inadequate Core Cooling

   Schedule for implementation of the subcooling meter is January 1, 1980. The licensee states that the meter will be installed by April 1980. Guidance in the October 30, 1979 letter should be followed with respect to subcooled meter requirements.

3. SECTION 2.1.6.a - System Integrity for High Radioactivity

   The January 1, 1980 deadline is a firm requirement. By that time AEP should provide a summary description of its program and leak rate measurements. The program should include testing.

4. SECTION 2.1.8.a - Post-Accident Sampling

   The design review, procedure development and modification identification must be completed by January 1, 1980 and the necessary modifications must be implemented by January 1, 1981.

ENCLOSURE 2

COOK 1/2

CLARIFICATION OF LICENSEE'S POSITION IS NEEDED
TO VERIFY COMPLIANCE

1. SECTION 2.1.1 - Pressurizer Heaters

   AEP's response to the issue of engineering pressurizer heaters did not address the part 2, 3 and 4 of this position. Additional clarification which addresses these parts of the position will be required.

2. SECTION 2.1.3 (a) - Direct indication of Valve Position

   PORVs have limit switches which give control room indications but are not alarmed. The alarm on the temperature device is not sufficient.

   Pressurizer safety values must also have positive indication and alarms.

3. SECTION 2.1.8.a - Post-Accident Sampling

   The sample analysis capability must include determination of hydrogen gas in the containment atmosphere as well as disolved gases (H_2, O_2) in the reactor coolant. If a meeting with the NRC staff on this subject is desired, AEP should formally request such a meeting. The lessons learned team will investigate the need for an industry wide meeting on the generic subject.

4. SECTION 2.1.8.c - Improved Iodine Instrumentation

   The instrumentation should be shown to work in an environment of high concentrations of noble gases. By January 1, 1981 capability should exist for flushing the cartridges with clean gas and for counting the cartiridges in a low background area.

5. SECTION 2.2.1 (b) - Shift Technical advisor (STA)

   AEP states that the STA will be on call and at no time over 45 minutes from the plant. The NRC nearterm position requires that the STA be on shift and available in the control room within 10 minutes.

6. SECTION 2.2.2.B. - Technical Support Center

   Address the requirement of radiation monitoring for the onsite technical support center as identified by clarification letter of October 30, 1979.