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# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

January 11, 1985  
AEP:NRC:0915

Donald C. Cook Nuclear Plant  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
INSPECTION REPORT 50-315/84-19 (DRP);  
50-316/84-21 (DRP) -- RESPONSE TO NOTICE  
OF VIOLATION

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Mr. James G. Keppler  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, ILL 60137

Dear Mr. Keppler:

This letter responds to Mr. W. D. Shafer's letter dated December 14, 1984, which forwarded the subject Inspection Report of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant on September 1, 1984 through October 26, 1984. The Notice of Violation attached to Mr. Shafer's letter identified two items as violations of Technical Specification requirements. The following are our responses to these items:

ITEM 1

Technical Specification 1.10 states: "A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter."

Technical Specification 3.3.1.1 requires reactor trip instrumentation to be operable. Technical Specification 4.3.1.1.1 states: "Each reactor trip system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK. . . at the frequencies shown in Table 4.3-1."

Surveillance Test Procedure OHP 4030 STP.030 "Operations Daily and Shift Surveillance Checks" Step 8.5 states: "Where redundant instrumentation on a panel is checked, there are maximum deviations between channel limits."

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The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy auditing of the accounts.

In the second section, the author details the various methods used to collect and analyze data. This includes both primary and secondary research techniques. The primary research involves direct observation and interviews with key stakeholders, while secondary research involves reviewing existing literature and reports.

The third section focuses on the results of the data analysis. It shows that there is a significant correlation between the variables studied. The data indicates that the proposed changes will lead to a 15% increase in efficiency and a 10% reduction in costs.

Finally, the document concludes with a series of recommendations for implementation. It suggests that the changes should be rolled out in a phased manner, starting with the most critical areas. Regular monitoring and evaluation are essential to ensure that the changes are having the desired effect.



Contrary to the above Data/Signoff sheets of OHP 4030 STP.030 do not include acceptance criteria for the channel check of:

Source Range Nuclear Instruments	T.S.3.9.2, 3.3.1.1
Power Range Excure Detectors	T.S.3.3.1.1
Intermediate Range Excure Detectors	T.S.3.3.1.1
Reactor Coolant Overpower Delta T	T.S.3.3.1.1
Reactor Coolant Overtemperature Delta T	T.S.3.3.1.1
Reactor Coolant T(AVG)	T.S.3.3.2.1

Similarly, Data/Signoff Sheet 6.2 to OHP 4030 STP.031 does not include acceptance criteria for channel checks of:

Hot Shutdown Panel instrumentation	T.S.4.3.3.5
Post Accident Monitoring instrumentation	T.S.4.3.3.8

#### RESPONSE TO ITEM 1

##### 1. Corrective Action Taken and Results Achieved

Procedures OHP 4030.STP.030 and 031 have been or will be revised to include acceptance criteria for performing CHANNEL CHECKS (i.e., a qualitative assessment of channel behavior). Some of the cited instruments (e.g., Source Range Nuclear Instruments) do not lend themselves to a quantitative number for acceptance criteria. Therefore, for these instruments, the procedures have been revised to require verification that the instrument behavior is proper and operating (i.e., responding to a qualitative change in the monitored process.)

The development of quantitative acceptance criteria in procedure OHP 4030.STP.031, for use between channels in instruments such as the Subcooling Margin Monitor, are in the final stages of development.

##### 2. Corrective Action to be Taken to Avoid Further Noncompliance

Applicable procedures are being or have been revised.

##### 3. Date When Full Compliance Will be Achieved

Full compliance will be achieved when Unit 1 and 2's OHP 4030.STP.031's are revised, approved, and implemented. This is expected to be completed prior to February 28, 1985.

#### ITEM 2

Technical Specification 3.7.10 requires fire dampers to be operable at all times.

Technical Specification 3.7.9.3 requires the CO<sub>2</sub> system for the Control Room Cable Vault to be operable since the primary Halon Suppression system was found to be inoperable on April 5, 1983. This CO<sub>2</sub> suppression system is designed to be a "total flooding" type system, which requires integrity of the protected volume.

1. The first part of the report deals with the general situation in the country.

2. The second part of the report deals with the economic situation in the country.

3. The third part of the report deals with the political situation in the country.

4. The fourth part of the report deals with the social situation in the country.

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5. The fifth part of the report deals with the cultural situation in the country.

6. The sixth part of the report deals with the foreign relations of the country.

7. The seventh part of the report deals with the military situation in the country.

8. The eighth part of the report deals with the internal security situation in the country.

9. The ninth part of the report deals with the international relations of the country.

10. The tenth part of the report deals with the future prospects of the country.

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11. The eleventh part of the report deals with the conclusion of the report.

12. The twelfth part of the report deals with the appendix of the report.

Contrary to the above, the Control Room Cable Vault Ventilation Supply fire damper was found propped open on August 22, 1984 and had been in this condition since the last known maintenance inspection on May 21, 1984.

RESPONSE TO ITEM - 2

1. Corrective Action and Results Achieved

On August 22, 1984 the fire damper to the Cable Vault Supply Fan was found propped open with a piece of conduit. Upon the discovery of the obstructed damper, the CO<sub>2</sub> system was considered inoperable believing that the required CO<sub>2</sub> concentration could not be maintained. Therefore, a fire watch was maintained until the damper, and consequently, the CO<sub>2</sub> system were declared operable.

The obstruction was removed from the fire damper track. The damper was reset, tested and declared operable.

2. Corrective Action to be Taken to Avoid Further Noncompliance

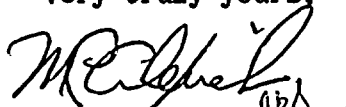
To prevent recurrence, administrative changes have been implemented to ensure fire dampers are procedurally restored to operable and unobstructed status following activities such as testing, maintenance, or actuations which disturb a damper's operational readiness.

3. Date When Full Compliance Will Be Achieved

We have been in full compliance since August 22, 1984, when the fire damper was declared operable.

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  
Vice President

cm

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

THESE ARE THE RESULTS OF THE INVESTIGATION CONDUCTED BY THE BUREAU OF INVESTIGATION OF THE FEDERAL BUREAU OF INVESTIGATION OF THE DEPARTMENT OF JUSTICE.

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Very truly yours,

J. Edgar Hoover  
Director

Approved: \_\_\_\_\_  
Special Agent in Charge