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INDIANA & MICHIGAN ELECTRIC COMPANY

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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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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 Excore Detectors	T.S.3.3.1.1
Intermediate Range Excore 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_2 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_2 suppression system is designed to be a "total flooding" type system, which requires integrity of the protected volume.

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1. [illegible]

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[illegible]	[illegible]
[illegible]	[illegible]

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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_2 system was considered inoperable believing that the required CO_2 concentration could not be maintained. Therefore, a fire watch was maintained until the damper, and consequently, the CO_2 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 1/11/85

cm

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