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INDIANA & MICHIGAN ELECTRIC COMPANY

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February 1, 1985
AEP:NRC:0917

Donald C. Cook Nuclear Plant
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
INSPECTION REPORT 50-315/84-22 (DRP);
50-316/84-24 (DRP) -- RESPONSE TO NOTICE
OF VIOLATION

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 31, 1984, which forwarded the subject Inspection Report of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant on November 17, 1984 through December 21, 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

Unit 1 Technical Specification 6.8.1.f requires implementation of written procedures for the Fire Protection Program. PMI-2270, "Fire Protection and Safety Equipment", at Paragraph 10.2.1 requires persons exiting a carbon dioxide protected area to remove their name from the plastic board.

Contrary to the above, on December 7, 1984 the inspector found two names on the plastic board to the Unit 1 4KV Switchgear Room when there was only one person in the room.

RESPONSE TO ITEM 1

1. Corrective Action Taken and Results Achieved

Upon notification by the NRC Resident Inspector, the immediate corrective action taken was to perform a security accountability check of the affected room. This check confirmed that only one individual (the Fire Watch) was in the room. A physical check of the room was performed, the individual was visually confirmed not to be in the room and his name was removed from the sign-in (plastic) board. A Condition Report on the occurrence was initiated. Investigation of the Condition Report revealed that the individual who left the room with his name still on the board,

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although personally aware of the procedural requirements, did so in error. He was reinstructed on the procedural requirements for entering and exiting a carbon dioxide protected area.

2. Corrective Action to be Taken to Avoid Further Noncompliance

We have reviewed the relevant procedures and feel that they are adequate. We will reemphasize the importance of personnel accountability in hazardous areas and the personal responsibility of individuals entering such areas to log in and out.

3. Date When Full Compliance Will be Achieved

Full compliance was achieved on December 7, 1984, when the individual was confirmed not to be in the Unit 1 4KV Switchgear Room and his name was removed from the sign-in (plastic) board for that room.

ITEM 2

Unit 1 Technical Specification 6.8.1.a by reference to Regulatory Guide 1.33 (November 1972) requires implementation of administrative procedures for the control of temporary changes. PMI-2010, "Plant Managers and Department Head Instruction, Procedures and Associated Indexes", at Section 3.13.3.C.I requires that the change sheet form shall include instructions for replacing the affected pages as well as a sufficient explanation regarding the need for the change. The change sheet shall then be placed at the front of the affected instruction or procedure as a permanent record of the change until the next revision.

Contrary to the above, on December 14, 1984 the inspector found **12 THP 601 RAD.584, "Eberline Radiation Monitoring System Secondary Source Calibration", being used to calibrate radiation instrument ERS 1400 without change sheets 9, 10 and 12 properly placed in the procedure.

RESPONSE TO ITEM 2

NOTE: In the body of Inspection Report No. 50-315/84-22; 50-316/84-24, it is stated correctly that the procedure Change Sheets in the violation were No. 9, 11 and 12. The Notice of Violation, incorrectly identifies the Change Sheets as No. 9, 10 and 12.

1. Corrective Action and Results Achieved

When the violation was identified and brought to the attention of the individual performing the calibration, the procedure was halted and Change Sheets No. 9, 11 and 12 were inserted per the procedure change sheet instruction. The calibration procedure was reinitiated at the beginning and completed in its entirety.

[illegible]

2. Corrective Action to be Taken to Avoid Further Noncompliance

Radiation Protection Administrative procedures are being updated to include specific requirements which will provide assurance that procedure change sheets are fully incorporated correctly after receiving approval and prior to the next use of the procedure. These changes will be complete by April 1, 1985. As an interim measure, pending completion and implementation of formal guidance on this topic, a letter to all R. P. Section Supervisors has been issued. This letter details the responsibility of the individual who obtains the required Management and Senior Reactor Operator approval for "On The Spot" change sheets, to insure that the change sheets are promptly and properly placed in the working copy of the procedure.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved on December 14, 1984 when procedure Change Sheets No. 9, 11 and 12 for procedure **12 THP 6010 RAD.584, "Eberline Radiation Monitoring System Secondary Source Calibration", being used for calibration of ERS 1400 were properly incorporated prior to reinitiation of the calibration procedure.

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

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