

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

July 24, 1986

AEP:NRC:1001

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC INSPECTION REPORT NOS. 50-315/86001 (DRSS)
AND 50-316/86001 (DRSS)

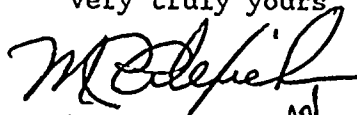
Mr. James G. Keppler, Regional Director
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

This letter is in response to Mr. W. D. Shafer's letter dated June 25, 1986, which forwarded the report on the safety inspection conducted by members of your staff. This inspection was conducted from April 7 through May 29, 1986 on activities at the D. C. Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Shafer's letter identified three violations. Violations 2 and 3 are addressed in the attachment to this letter. Violation 1 required no response, because the inspection showed that corrective action had been taken to prevent recurrence.

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

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Attachment

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

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RESPONSE TO NRC INSPECTION REPORT
50-315/86001 AND 50-316/86001

NRC Violation No. 2

"10 CFR 71.5 prohibits transport of any licensed material outside the confines of a plant or other place of use or delivery of licensed material to a carrier for transport unless the licensee complies with applicable regulations of the Department of Transportation in 49 CFR Parts 170-189.

49 CFR 173.425(b)(6) requires that exclusive use shipments of low specific activity (LSA) material must be braced so as to prevent shifting of lading.

Contrary to the above, on April 25, 1986, at the Barnwell waste burial facility, a State of South Carolina inspector found that, due to inadequate blocking and bracing, all three packages on the flatbed trailer had undergone a shift of lading during the transportation of LSA exclusive use shipment No. 0486-294-A from D. C. Cook to Barnwell."

Response to NRC Violation No. 2

Corrective Action Taken and the Results Achieved

On May 1, 1986 the South Carolina Department of Health and Environmental Control (DHEC) informed us that radioactive waste received at the Barnwell facility was in noncompliance with applicable regulations. As a result, the D. C. Cook Plant was assessed a civil penalty for this violation. We were also required to submit to the DHEC evidence that adequate measures were implemented to ensure future compliance with applicable state and federal laws.

Corrective Action To Be Taken to Avoid Further Violations

The following corrective actions were submitted to DHEC on June 19, 1986, relative to the tiedown configuration on future shipments of HN100 LVM liners:

- (1) Instead of two chains crossed over the top of the liner, four individual chains hooked into the stiffeners near the neck of the container will be used.
- (2) Periodically the chain tension will be checked to ensure tautness during the trip.
- (3) The blocking will be located at approximately 45° to the axes (length and width) of the trailer. All liners or other containers will be individually blocked.
- (4) Any liner that does not sit flat on the trailer will be shimmed.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on July 2, 1986, when the DHEC advised the plant that the proposed corrective measures were satisfactory. On July 7, 1986, our first LSA shipment was made incorporating the revised blocking and bracing operations.

NRC Violation No. 3

"Technical Specification 6.11 requires adherence to radiation protection procedures. Procedure 12 THP 6010.RAD.404, Establishing Posted Areas, requires any area in which the removable contamination on any accessible surface or equipment exceeds 500 dpm/100 cm² beta-gamma to be posted as a contamination area.

Contrary to the above, on May 6, 1986, the inspectors found equipment with removable contamination greater than 500 dpm/100 cm² beta-gamma located in unposted areas on the 633-foot elevation level of the auxiliary building, in that:

- a. Pipe fittings stored in an open cabinet adjacent to the Freon tool decontamination area had removable contamination of 4000 dpm/100 cm² beta-gamma.
- b. A cart located adjacent to the hot tool crib decontamination area had removable contamination of 5000 dpm/100 cm² beta-gamma.
- c. A slag hammer stored on a rack affixed to the outside of an equipment cabinet, located adjacent to the hot tool crib, had removable contamination of 220,000 dpm/100 cm² beta-gamma."

Response to NRC Violation No. 3Corrective Action Taken and the Results Achieved

The identified items were removed to a posted contamination area immediately upon discovery by the radiation protection technician accompanying the inspectors.

Corrective Action to be Taken to Avoid Further Violations

On June 9, 1986, a letter from the Plant Manager was sent to each of the major contractors who provide services to the plant. The letter describes the proper methods for control of contaminated material and requests support for general compliance with all plant requirements.

The frequency of surveys in the area of concern has been increased to confirm that the problem has been corrected or indicates a need for additional action to ensure adherence to radiation protection procedures.

Date When Full Compliance Was Achieved

Full compliance was achieved on May 6, 1986, when the contaminated items were removed to a posted contamination area.

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