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 RECIP. NAME RECIPIENT AFFILIATION
 DAVIS, A. B. Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 871023 ltr re violations noted in Insp Repts
 50-315/87-02 & 50-316/87-02. Corrective actions: supervisory
 personnel reminded of need to ensure that personnel complied
 w/radiation work permits.

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AEP:NRC:1044

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC INSPECTION REPORT NOS. 50-315/87002 (DRSS) AND
50-316/87002 (DRSS); RESPONSE TO VIOLATIONS

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Attn: A. B. Davis

November 23, 1987

Dear Mr. Davis:

This letter is in response to J. A. Hind's letter dated October 23, 1987, which forwarded the report on the safety inspection conducted by members of his staff. This inspection was conducted from July 16, 1987 through August 31, 1987 on activities at the Donald C. Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Hind's letter identified five violations, four of which (violations 2 through 5) required responses from Indiana Michigan Power Company. The required responses are provided in the attachment to this letter.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,

M. P. Alexich
Vice President

cm

Attachments

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

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Attachment 1 to AEP:NRC:1044

Violation Responses

Response to NRC Inspection Report
50-315/87002 and 50-316/87002

NRC Violation No. 2

Technical Specifications 6.8.1.a require adherence to the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972. Section G.5.e of the aforementioned Appendix A requires radiation work permit procedures. Procedure No. 12 THP 6010.RAD.406, Radiation Work Permit, requires individual workers to properly wear anti-contamination clothing as specified by radiation work permits.

- a. Contrary to the above, on July 20, 1987, during an inspection tour of the auxiliary building, an inspector observed two workers performing activities governed by the restrictions of Radiation Work Permit No. 0030, Wet Laundry Facility, were not wearing taped hoods as required by the radiation work permit.
- b. Contrary to the above, on July 21, 1987, during an inspection tour of the Unit 1 containment, an inspector observed three workers performing activities governed by the restrictions of Radiation Work Permit No. 0493, Reactor Head Stud Tasks, were not wearing beta shields as required by the radiation work permit.

Response to NRC Violation No. 2

Corrective Action Taken and Results Achieved

Supervisory personnel for the individuals were reminded of the need to ensure that their personnel complied with the Radiation Work Permits. Radiation protection personnel did investigate laundry operations and found all personnel to be in compliance with the Radiation Work Permit. On September 25, 1987, Radiation Protection requested that Radiation Work Permit compliance receive additional emphasis in General Employee Training.

Corrective Action To Be Taken to Avoid Further Violations

Methods to ensure and demonstrate that personnel performing work under a specific RWP are thoroughly familiar with the RWP requirements are being explored. Effective measures to improve RWP adherence and work/dress practices will be implemented.



Date When Full Compliance Will Be Achieved

Full compliance was achieved and reconfirmed July 21, 1987. Remaining actions addressed above will be completed by December 31, 1987.

NRC Violation No. 3

10 CFR 20.201(b) states that each licensee shall make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations of this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

As used in the regulations in this part, "survey" means an evaluation of the radiation hazards incident to the production, use, releases, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation includes a physical survey of the location of materials and equipment, and measurements of levels of radiation or concentrations of radioactive material present.

Procedures No. 12 THP 6010.RAD.404. Establishing Posted Areas, and No. 12 THP 6010.RAD.200. Routine Radiation and Contaminated Surveys and Establishing Posted Areas, require any area in which the removable contamination on any accessible surface or equipment exceeds 500 dpm/100 sq cm beta-gamma to be posted as a contamination area.

Contrary to the above, the licensee failed to adequately evaluate removable contamination levels on equipment to ensure compliance with 10 CFR 20.201(a) and 10 CFR 20.203(a) in that the inspectors or the licensee found the following equipment with removable contamination greater than 500 dpm/100 sq cm beta-gamma located outside designated contamination areas in the auxiliary building:

- a. On March 10, 1987, three chain falls with removable contamination of about 6000, 3000, and 1400 dpm/100 sq cm beta-gamma, respectively, were issued for use from the hot tool crib on the 633-foot elevation to two workers. As a result of the failure to adequately survey the chain falls before issuance, the hands of both workers became contaminated.
- b. On March 18, 1987, a steam generator eddy current probe with removable contamination of about 350,000 dpm/100 sq cm beta-gamma was found on the clean side of the 609-foot elevation decontamination/laydown area.
- c. On April 15, 1987, a steam generator tube marking tool with removable contamination of about 130,000 dpm/100 sq cm was found near the 609-foot elevation decontamination/laydown area.
- d. On July 20, 1987, a pressure gauge with removable contamination of about 1000 dpm/100 sq cm was found on a cart adjacent to the 609-foot elevation decontamination/laydown area.



Response to NRC Violation No. 3

Corrective Action Taken and the Results Achieved

The specific corrective actions taken were detailed in the Radiological Deficiency Reports written in response to items a, b, and c. The inspector reviewed these reports during his inspection without comment. The immediate actions taken in response to these items involved a complete radiation survey of chain falls and come-alongs in the hot tool crib with subsequent removal and decontamination of any contaminated items, bagging and labelling of the eddy current probe, and bagging, labelling and proper disposal of the steam generator tube marking tool. Relative to item d, the gauge was confiscated by Radiation Protection personnel, contained and placed in the decontamination process on July 20, 1987.

Corrective Action To Be Taken to Avoid Further Violations

Although cited as a lack of survey, it is the opinion of the licensee that the events identified are indicative of a lack of material identification and control. Therefore, the corrective action is the development and implementation of a radioactive material control program. This program will address: (a) Tagging and marking radioactive material, (b) Transportation of radioactive material, (c) Radioactive material laydown areas, (d) Storage of radioactive material, and (e) Equipment released from a radiologically controlled area.

Date When Full Compliance Will Be Achieved

The radioactive material control program discussed above will be in place by February 1, 1988.

NRC Violation No. 4

Technical Specification 6.11 requires adherence to radiation protection procedures. Radiation Protection Procedure No. 12 THP 6010.RAD.741, Termination Exposure Reporting, requires that the termination letter log be properly maintained, and specifies that TLD badges be sent to the vendor for readout within one week from termination notification, that TLD badges be promptly processed, and that the results be promptly transmitted to the licensee.

Contrary to the above, a selective review of the termination letter log from March through September 1986 found that the termination letter log was not properly maintained in that more than 100 incorrect log entries were found regarding the dates of termination: TLDs sent to the vendor for readout, TLD results received by the licensee, and the 10 CFR 20.408 termination exposure report required issuance. Additionally more than 100 log entries showed that the TLD badges were not being processed and reported to the licensee promptly by the vendor in that the period of time between sending the TLDs to the vendor and the receipt of the TLD results by the licensee ranged from more than two weeks to about two months.

Response to NRC Violation No. 4Corrective Action Taken and the Results Achieved

The 1986 termination letter log was reviewed, errors were identified and when possible, corrected. Dosimetry personnel were verbally instructed in maintenance of the termination letter log. 12 THP 6010 RAD.741 was revised to simplify the termination letter log and to provide distinct guidance on the maintenance of the log.

Corrective Action To Be Taken to Avoid Further Violations

We believe the actions cited above will be adequate to avoid further violations.

Date When Full Compliance Will Be Achieved

Full compliance was achieved November 12, 1987.

NRC Violation No. 5

10 CFR 20.408(b) requires a report of individuals' radiation exposures, incurred during the period of employment or work assignment in the licensee's facility, be furnished to the NRC within 30 days after the exposure of the individual had been determined by the licensee or 90 days after the date of termination of employment or work assignment, whichever is earlier.

Contrary to the above, more than 600 termination letter log entries showed that the required termination exposure reports were issued more than 30 days after the TLD results were received by the licensee from the vendor, and the termination exposure reports on at least four individuals (who terminated employment on April 10 and 11, 1986), were furnished to the NRC 91 days after employment termination.

Response to NRC Violation No. 5

Corrective Action Taken and the Results Achieved

At the time of the cited occurrence, the licensee's procedural definition of "the exposure of the individual had been determined" was made following the resolution of discrepancies, not receipt of TLD results. Therefore, the initiation of the 30-day time period could follow TLD result receipt by a few weeks, thus extending the deadline. Corrective action has included staff re-assignments in the Dosimetry Group. Procedure 12 THP 6010 RAD.741, "Termination Exposure Reporting," was revised to reflect the NRC inspector's interpretation that the 30-day time period starts upon receipt of exposure results and the 90-day time period starts upon termination.

Corrective Action To Be Taken to Avoid Further Violations

We believe the corrective actions discussed above will be adequate to avoid further violations.

Date When Full Compliance Will Be Achieved

Full compliance was achieved November 12, 1987.