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AUTH. NAME: ALEXICH, M.P. AUTHOR AFFILIATION: Indiana Michigan Power Co. (formerly Indiana & Michigan Ele)  
 RECIP. NAME: DAVIS, A.B. RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 880830 ltr re violations noted in Insp Repts  
 50-315/88-15 & 50-316/88-17.

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Donald C. Cook Nuclear Plant Units 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
RESPONSE TO INSPECTION FINDINGS; INSPECTION REPORT  
NOS. 50-315/88015 AND 50-316/88017

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

Attn: A. B. Davis

October 4, 1988

Dear Mr. Davis:

This letter is in response to Mr. Geoffrey C. Wright's letter dated August 30, 1988, that forwarded the report on the special safety inspection conducted by an NRC Emergency Operating Procedures Inspection Team. This inspection was conducted from July 5-15, 1988, on activities at the Donald C. Cook Nuclear Plant Units 1 and 2. The inspection report attached to Mr. Wright's letter identified six inspection findings to which we were requested to respond. These inspection findings are addressed 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

ldp  
Attachment

cc: D. H. Williams, Jr.  
W. G. Smith, Jr. - Bridgman  
R. C. Callen  
G. Charnoff  
G. Bruchmann  
NRC Resident Inspector - Bridgman

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ATTACHMENT TO AEP:NRC:10601

RESPONSE TO NRC INSPECTION FINDINGS

NRC OPEN ITEM: 50-316/88017-01

DESCRIPTION: "Performance of a labeling review and correction of labeling discrepancies between EOPs and panel indications as outlined in Appendix C (paragraph 6)"

RESPONSE: The current (in progress) revision of the EOPs, planned for completion by December 31, 1988, for both units, will receive a 100 percent walkdown whereby each will be evaluated against Verification/Validation checklist criteria such as: "Can the operator use labeling, abbreviations, symbols and location information as provided on control board labeling and annunciators to find the needed equipment?" In this way, the component nomenclature in the procedure will be made to match the control room/plant labeling. This approach is similar to that used in the original verification/validation process conducted when the EOPs were initially issued. However, extensive relabeling was done in the control room as a result of the Detailed Control Room Design Review which resulted in creating many of the discrepancies found during the NRC inspection. As part of the 100 percent walkdown, each item listed in Appendix C to the inspection report will be specifically addressed.

NRC OPEN ITEM: 50-316/88017-02

DESCRIPTION: "Correction of technical and human factors discrepancies contained in the EOPs as outlined in Appendix B (paragraph 6)"

RESPONSE: The majority of technical and human factors discrepancies outlined in Appendix B to the inspection report will be corrected as recommended in the inspection report during the current (in progress) revision of the EOPs. A remaining few, however, are still being evaluated and as such have not been fully resolved. A detailed disposition for any of the Appendix B items not adopted as recommended in the inspection report will be documented and available for your review at the plant. This documentation will be completed on or before the issuance of the next revision of the procedures.

As noted in the response to Item 1 above, the EOP revision is scheduled to be complete by December 31, 1988.

NRC OPEN ITEM: 50-316/88017-03

DESCRIPTION: "Upgrading two inadequate procedures (paragraph 6)"

RESPONSE: Of the two procedures identified during the audit as inadequate, one, 2-OHP 4023.001.011, "Reactor Shutdown from Hot Standby Panel Due to Control Room Inaccessibility," will be revised to address the concerns raised during the audit. The revision of this procedure will be effective (issued) prior to the start-up of Unit 2. The Unit 1 counterpart, 1-OHP 4023.001.011, Rev. 5 has been revised to address audit concerns and was issued on August 1, 1988.

For the other procedure, 2-OHP 4023.001.006, "Loss of Control Air," the Performance Electrical/Controls Section is presently researching plant drawings and design documents and will provide data to the procedure group by December 15, 1988. The Operations Department procedure group will then make the necessary procedure revisions to address the concerns raised in the inspection report.

NRC OPEN ITEM: 50-316/88017-04

DESCRIPTION: "Failure to maintain a correct procedure and to take adequate corrective action (paragraph 6)"

RESPONSE: We have reviewed the cause of the failure to maintain a correct procedure and to take adequate corrective action. A large portion of the cause was inattention to detail and failure to react on a broad scope when applying the needed corrections to the procedure system. Two significant contributing causes of the instance identified in the inspection report were the large number of comments and correction items that were generated by the Verification/Validation process and the fact that the Control

Room Design Review process overlapped the procedure generation time period.

We have obtained a computer-based system to aid us in management of the Emergency Operating Procedures. This system will help prevent this type of error from occurring in the future by providing the ability to search for similar key words, phrases, etc. in all procedures.

Further, our review revealed that this problem should be limited to just the instance identified in the inspection report and that our Verification/Validation process and procedure walkdown enhancements to be used in future procedure revisions will prevent a recurrence of this type.

NRC OPEN ITEM: 50-316/88017-05

DESCRIPTION: "Improve procedure network control (paragraph 6)"

RESPONSE: The NRC open item was broken down into three separate items in the inspection report:

A) "Conduct walkthroughs of the procedures in the control room and in the plant."

As mentioned in response to Open Item 50-316/88015-01, a 100 percent walkdown of the next revision to the upgraded EOPs will be conducted. This includes those procedures not affected by revision 1A to the WOG ERGs.

B) "Conduct a verification of Technical Specification requirements."

A verification of Technical Specification Containment Integrity versus procedural requirements has been completed. This was an independent check by two different individuals, one using Technical Specifications and the other using plant procedures (other than EOPs), drawings, etc. to ensure containment isolation valves have been identified and included in the procedures. As a follow up to this evaluation, the AEPSC Nuclear Safety and

Licensing Section will also conduct a review of the procedural versus Technical Specification requirements for containment integrity.

C) "Conduct an evaluation of the review and revision process as it applies to EOPs."

The EOP revision process as it applies to EOPs has been evaluated. As a result, an administrative document will be developed which details the Verification/Validation procedure, processing and prioritization of comments, and EOP network configuration control. This document will be completed by March 31, 1989.

NRC OPEN ITEM: 50-316/88017-06

DESCRIPTION: "Review and resolve accumulated EOP comments (paragraph 8)"

RESPONSE: The Operations Department will review and resolve accumulated EOP comments during the current revision effort, scheduled to be complete by December 31, 1988. In addition, future comments received will be reviewed and a priority (e.g. prompt, expedite, routine) assigned. These comments will be acted on and tracked to ensure that a timely response is initiated. The schedule will be to incorporate "prompt" comments within one week, revise procedures that have accumulated three "expedite" comments within two months, and to incorporate "routine" comments during the procedure's biennial review unless an inordinate number has accumulated, in which case it will be revised sooner.

Feedback to the Operators will be provided as to the disposition status of comments submitted.