

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

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SUBJECT: Responds to NRC 881205 ltr re violations noted in Insp Repts  
 50-315/88-23 & 50-316/88-27.

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AEP:NRC:1060L

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. 50-315/88023 (DRP) AND  
50-316/88027 (DRP); RESPONSE TO VIOLATION

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

Attn: A. B. Davis

December 5, 1988

Dear Mr. Davis:

This letter is in response to W. L. Axelson's letter dated November 8, 1988, that forwarded the report on the routine safety inspection conducted by members of your staff. This inspection / was conducted on September 8 through October 19, 1988, on activities at the Donald C. Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Axelson's letter identified one violation. This violation is addressed in the attachment to this letter.

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

Sincerely,

M. P. Alexich  
Vice President

MPA/eh

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:1060L

RESPONSE TO VIOLATION

## NRC VIOLATION

"Unit 1 Technical Specification 6.8.1.a requires procedures be implemented as recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972, which includes, at Item C.8, operating procedures for special containment systems. Licensee procedure 1-OHP 4021.028.008, "Operation of Containment Air Recirculation and Hydrogen Skimming Systems" is a special containment system procedure and requires specific Hydrogen Skimming System damper positions during Unit operation to ensure capability to prevent accumulation of potentially explosive quantities of accident-generated hydrogen gas.

Contrary to the above, four of twenty-four Hydrogen Skimming System dampers were not positioned as required by procedure 1-OHP 4021.028.008 for some undetermined period of Unit operation prior to September 7, 1988. Two dampers were closed two notches more than specified and two were closed one notch more."

## RESPONSE TO NRC VIOLATION

(1) CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

On September 7, 1988, four Unit 1 hydrogen skimming system dampers were identified as being out of the position required by procedure 01-OHP 4021.028.008. The previous damper position evaluation performed in accordance with procedure 01-OHP 4021.028.008 was completed August 27, 1987. All dampers were signed off as being in their correct position.

Following discovery of the mispositioned dampers, a damper lineup was conducted using procedure 01-OHP 4021.028.008 to reposition the four dampers to their correct position. An independent verification was also conducted to verify the position of all dampers in the hydrogen skimming system. Additionally, an analysis of the hydrogen skimming system using the "as found" damper positions was performed. These calculations showed that in the event of a loss of coolant accident, the hydrogen skimmer system would have performed its intended function.

The most probable cause of this violation is personnel error in that the involved personnel did not properly verify the position of these dampers when conducting the lineup on August 27, 1987. This error was induced by the ambiguous position indicator on the dampers and their difficult location. In addition the procedure did not contain provisions for independent verification.

(2) CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATION

Procedures 01-OHP 4021.028.008 for Unit 1 and 02-OHP 4021.028.008 for Unit 2 are being revised to incorporate independent verification of damper positions. Additional testing is being added to the surveillance test procedure program to verify the position of all dampers in the hydrogen skimming system at each containment closeout for which containment integrity was broken. The Operations Department is developing a method to more easily identify the correct position of the dampers.

(3) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All dampers in the hydrogen skimming system were verified in their correct position on September 7, 1988, returning the plant to full compliance. The additional corrective actions discussed above are scheduled for completion before February 1, 1989. This will ensure that steps are in place to prevent further violations prior to the upcoming Unit 2 restart and the Unit 1 restart following refueling.