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SUBJECT: Responds to 881201 ltr re violations noted in Insp Repts  
 50-315/88-24 & 50-316/88-28.

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AEP:NRC:1060M

Donald C. Cook Nuclear Plant Units 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
INSPECTION REPORTS 50-315/88024 (DRP) AND  
50-316/88028 (DRP); RESPONSE TO VIOLATION

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

Attn: A. B. Davis

January 4, 1989

Dear Mr. Davis:

This letter is in response to Mr. W. L. Axelson's letter of December 1, 1988, that forwarded the report on the routine safety inspection conducted on September 22 through November 16, 1988, on activities at the Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Axelson's letter identified one violation, which 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,

A handwritten signature in cursive script, appearing to read 'M. P. Alexich'.

M. P. Alexich  
Vice President

ldp

Attachment

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

8901130235 890104  
PDR ADOCK 05000315  
Q PDC

Handwritten initials 'LED' with a vertical line through them, possibly indicating a date or a specific action.



ATTACHMENT TO AEP:NRC:1060M

RESPONSE TO VIOLATION



NRC Violation

"Unit 2 Technical Specification 6.8.1.f requires procedures to be implemented covering the Fire Protection Program. Safety Procedure SP-03.00, "Hot Work Permits" is such a procedure. It requires that fire watches shall be present, with a fire extinguisher in their possession, during and for 30 minutes after any hot work for which the Permit specifies a fire watch.

Contrary to the above, at approximately 11:00 a.m. on October 28, 1988, no fire watch was present covering welding of a Unistrut attachment on steam generator No. 21, under Hot Work Permit No. 1247, even though the Permit specified a fire watch.

This is a Severity Level IV violation (Supplement I)."

1.0 Response to Violation

The failure to post a fire watch cited in the NRC Notice of Violation occurred during the performance of welding as part of the Steam Generator Repair Project (SGRP) at Cook Nuclear Plant Unit 2. The SGRP involved various hot work activities requiring fire watch personnel. Our SGRP contractor, MK-Ferguson, is responsible for the actual performance of this work under the supervision of MK-Ferguson's safety supervisor who has the responsibility to ensure that the work is performed in accordance with MK-Ferguson's Safety Procedure SP-03.00, "Hot Work Permits." SGRP fire watch personnel are assigned to MK-Ferguson to provide the required fire watches and to respond to potential fire situations.

Before performance of hot work, the MK-Ferguson safety supervisor completes the hot work permit required by procedure SP-03.00 and notifies the SGRP fire watch supervisor if a fire watch is necessary in order to have fire watch personnel assigned to the job. In the case of the cited violation, the need for a fire watch was properly communicated to the SGRP fire watch supervisor by the MK-Ferguson safety supervisor and a fire watch was assigned. However the fire watch left his assigned station before completion of the hot work. This was in violation of Safety Procedure SP-03.00.

2.0 Corrective Action Taken and Results Achieved

Prior to the October 28, 1988 violation, actions were in progress to reemphasize to fire watch personnel their responsibilities while performing fire watches, including the requirements for the operability and use of fire extinguishers. In addition, as part of these ongoing

actions, a second SGRP fire watch supervisor was added to each shift to further ensure that SGRP fire watch personnel properly fulfill their responsibilities in monitoring hot work activities. The Cook Nuclear Plant Fire Protection Coordinator, MK-Ferguson safety supervisors, SGRP fire watch supervisors and SGRP fire watches also met jointly to review hot work procedural requirements and the importance of maintaining attentiveness to assigned fire watch activities. Increased monitoring performed since October 28 by SGRP fire watch supervision, MK-Ferguson safety supervisors and the Cook Nuclear Plant Fire Protection Coordinator has found proper fire watch coverage for all hot work activities observed at the SGRP.

### 3.0 Corrective Action to Avoid Further Violations

To avoid further violations in this area, the following additional administrative controls have been initiated for the SGRP:

1. Shift meetings with MK-Ferguson safety supervisors and fire watch supervisors to discuss hot work activities and manpower requirements to ensure proper hot work coverage.
2. Shift meetings with fire watch supervisors and fire watch personnel to review fire watch responsibilities and attentiveness to fire watch assignments and equipment.
3. Tours by the plant Fire Protection Coordinator to ensure proper manning and equipment exists at the site of hot work performance.

### 4.0 Date When Full Compliance Will Be Achieved

The corrective actions discussed in Section 2.0 were completed November 16, 1988. Actions discussed in Section 3.0 will continue through the remaining period of performance of the SGRP.