

DMB

# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

July 5, 1985  
AEP:NRC:0939

Donald C. Cook Nuclear Plant Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
NRC Report Nos. 50-315/85014(DRS) and 50-316/85014(DRS)

Mr. James G. Keppler  
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 6, 1985, which forwarded the subject Inspection Reports of the special safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant during the period April 23, 1985 through May 20, 1985. The Notice of Violation attached to Mr. Shafer's letter identified three violations of the plant technical specifications. The responses to these violations are addressed in the Attachment to this letter.

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*  
M. P. Alexich  
Vice President  
RBK  
7/5/85

MPA/rjn

Attachments

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

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NRC Item No. 1

"Unit 1 and Unit 2 Technical Specification 6.8.1.f requires implementation of written procedures for the Fire Protection Program. PMI-2271, "Control of Combustible Material", paragraph 4.2.1, requires that all paint shall be stored in containers with tight fitting lids in either a UL/FM approved cabinet or the oil storage room located on the 595 foot elevation. In addition, the empty containers will be stored in the approved paint storage location or disposed of immediately.

Contrary to the above, on May 15, 1985, the inspector found paint improperly stored in a UL/FM cabinet on the 633 foot level of the Auxiliary Building.

This is a Severity Level IV violation (Supplement 1)."

RESPONSECorrective Actions Taken and Results Achieved

After being notified on May 15, 1985 of the existing condition, the discrepant material (paint cans without lids, two (2) small buckets of solidified paint, and one (1) uncovered pail with about 1" of fresh paint) was properly disposed. The solidified paint was discarded and the other combustibles were stored in containers with tight fitting lids in a UL approved storage cabinet. In addition, a container of neolube was found on June 18, 1985. It has been subsequently removed.

Corrective Actions Taken to Avoid Further Noncompliance

A memo was issued to the personnel responsible for the above discrepant conditions by the Fire Protection Coordinator. The memo stressed the proper storage of paints and other combustibles. In addition, the following items have been initiated to strengthen our compliance with the requirements of PMI-2271:

1. In May of this year the plant was divided into zones that were assigned to responsible departments for housekeeping and cleanliness. Each week inspections are conducted looking for items such as combustible materials. Highlights of these inspections are contained in the appropriate department's weekly letter to the plant manager.
2. We have also re-emphasized the criteria contained within PMI-2271 regarding control of combustibles to the individuals performing daily fire door inspections. These individuals will observe and report any deviations from this instruction to the appropriate individuals for further investigation and resolution.

3. Starting on June 21, 1985 instruction of appropriate craft personnel was begun in the storage of combustibles as pertains to the requirements outlined in PMI-2271, "Control of Combustible Materials."

The existing orientation program, concerning PMI-2271, "Control of Combustible Materials", will also be broadened to address the types of deviations noted in this citation.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on May 15, 1985. Additional training for craft personnel began on June 21, 1985. The orientation program for PMI-2271 will be expanded to address these topics by August 21, 1985.

NRC Item No. 2

"Unit 1 Technical Specification 4.2.1.3 [sic] requires, ...'The flow rate through the Reactor Coolant System shall be determined to be greater than or equal to 3000 gpm within one hour prior to the start of and at least once per hour during a reduction in Reactor Coolant System boron concentration...'

Contrary to the above, hourly determinations of flow were not made while the refueling cavity was being filled with an attendant small reduction in the Reactor Coolant System boron concentration.

This is a Severity Level V violation (Supplement 1)."

RESPONSE

Corrective Actions Taken and Results Achieved

On April 29, 1985, at 0422 hours with the Unit in Mode 6 (Refueling), the Control Room Operator transferred water from the refueling water storage tank (RWST) to the Reactor Coolant System (RCS). The RCS boron concentration was 2084 ppm while the RWST boron concentration was 2069 ppm. The reactor vessel flow surveillance specified in Technical Specification 4.1.1.3, was not completed prior to the dilution. However, the reactor core was sustained subcritical with a  $K_{eff}$  of less than 0.95 because the minimum boron concentration of 2000 ppm in the RCS and the refueling canal required under Technical Specification 3.9.1 was not violated. Since  $K_{eff}$  was less than 0.95 there were no adverse safety consequences due to this incident.

Corrective Actions Taken to Avoid Further Noncompliance

To prevent recurrence, procedures 1 and 2 OHP4021.018.005 for filling the Reactor Refueling Cavity have been revised to include verification/documentation of the Reactor Vessel Flow prior to a RCS dilution.

Date When Full Compliance Will Be Achieved

1-OHP4021.018.005, Revision 6, Change Sheet #1 - was approved on May 1, 1985. 2-OHP4021.018.005, Revision 3 - was approved ~~May 6,~~ June 1985.

NRC Item No. 3

"Units 1 and 2 Technical Specification 6.8.1.c requires written procedures be established, implemented and maintained covering surveillance and test activities of safety related equipment.

Contrary to the above, the following examples of failure to properly implement surveillance procedures for safety related equipment were identified:

- a. On September 17, 1984, the requirement of Procedure 12 MHP 4030 STP.023 (Unit 2 N Train battery surveillance) to verify that the voltage of each connected cell remained within 0.05 volts of the original acceptance value (reference Technical Specification 4.8.2.5.2.b.1[sic]) was not implemented when a decrease of 0.06 volts on cell No. 6 went unrecognized.
- b. On December 26, 1984, the requirement of Procedure 12 MHP 4030 STP.013 (Unit 1 AB battery surveillance) to correct the specific gravity determination to a 77°F equivalent (reference Technical Specification 4.8.2.3.2.6.2[sic]) was not implemented because a math error resulted in use of a wrong correction factor.
- c. On April 10, 1985, the requirement of Procedure 12 MHP 4030 STP.035 (Unit 2 AB battery surveillance) to record the temperature of every sixth cell was not implemented in that only 18 of 19 required cell temperatures (cell No. 24 being omitted) were recorded.

This is a Severity Level IV violation (Supplement 1)."

RESPONSECorrective Actions Taken and Results Achieved

- a. Although the voltage deviation violated Technical Specification 4.8.2.3.2.b.1, the performance of the system was not affected or jeopardized in any way. Subsequent tests conducted on 12/26/84 and 3/26/85 indicate that this was a short lived event in that the voltage had risen to an acceptable level.

- b. The math error was corrected and the resulting calculations indicated that the Unit 1 AB battery was within specification limits. Therefore, no adverse conditions existed.
- c. The missing data point had no significant safety impact. This was substantiated by treating the missing data as if it read effectively zero degrees Fahrenheit and dividing the sum of the 18 recorded readings by 19. The results were still within Technical Specification requirements.

Corrective Actions Taken to Avoid Further Noncompliance

- a. To assure continued compliance the following procedures will be revised to add the original battery acceptance criteria as a reference standard for voltage deviation.

\*\* 12MHP4030.STP.023 - "250 Volt "N" Train Batteries"

\*\* 2MHP4030.STP.035 - "Quarterly Surveillance Test Procedure for Plant 2AB Battery"

\*\* 12MHP4030.STP.040 - "Quarterly Surveillance of the 1AB and 1CD Batteries"

\*\* 12 MHP4030.STP.041 - "Quarterly Surveillance of the 2CD Batteries"

These corrective actions will be completed before November 1, 1985.

- b. To assure continued compliance the following procedures will be revised to add hold points to verify the accuracy of the mathematical calculations.

12MHP4030.STP.013 - "Maintenance Surveillance Test Procedure for Inspection for 250 Volt Plant Batteries AB & CD"

\*\* 12MHP4030.STP.023 - "250 Volt "N" Train Batteries"

\*\* 2MHP4030.STP.035 - "Quarterly Surveillance Test Procedure for Plant 2AB Battery"

\*\* 12MHP4030.STP.040 - "Quarterly Surveillance of the 1AB and 1 CD Batteries"

\*\* 12MHP0430.STP.041 - "Quarterly Surveillance of the 2CD Batteries"

These corrective actions will be completed before November 1, 1985.

- c. To assure continued compliance the following procedures will be revised to add hold points to verify the completeness of the data on the data collection sheets.



- 12 MHP4030.STP.013 - "Maintenance Surveillance Test  
Procedure for Inspection of 250 Volt  
Plant Batteries AB & CD"
- \*\* 12MHP4030.STP.023 - "250 Volt "N" Train Batteries"
- \*\* 12MHP4030.STP.035 - "Quarterly Surveillance Test Procedure  
for Plant 2AB Battery"
- \*\* 12MHP4030.STP.040 - "Quarterly Surveillance of the 1AB and  
1CD Batteries"
- \*\* 12MHP4030.STP.041 - "Quarterly Surveillance of the 2CD  
Batteries"

These corrective actions will be completed before November 1, 1985. In addition, the maintenance department administrative compliance coordinators at the plant are providing a final check of the data sheets and job orders, as an interim measure, to ensure there are no similar occurrences prior to having these procedure revisions completed.

Date When Full Compliance Will Be Achieved

The Cook Plant is currently in full compliance. The procedures discussed above will be revised before November 1, 1985.