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INDIANA & MICHIGAN ELECTRIC COMPANY

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March 5, 1986
AEP:NRC:0977

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC INSPECTION REPORT NOS. 50-315/85036(DRS)
AND 50-316/85036(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. C. Norelius' letter dated February 6, 1986, which forwarded the routine safety inspection conducted by members of your staff. This inspection was conducted from November 5 through December 9, 1985, on activities at the D. C. Cook Nuclear Plant Units 1 and 2. No violations were noted; however, it was requested that a written response be provided, discussing our plans for addressing problems in our conduct of testing and maintenance which led to unnecessary challenges to the reactor safety systems.

Mr. W. G. Smith, Jr.'s November 27, 1985 letter to you provided additional information relative to the containment Integrated Leak Rate Test (ILRT) (Inspection Report 85027). In that letter, Mr. Smith identified three contributors to the events which occurred during the ILRT which we believe are also applicable to the concerns noted in this inspection report. These contributors are: 1) lack of sufficient clarity and detail in procedures on critical activities; 2) lack of positive administrative controls; and 3) need for additional awareness by Plant staff to identify potential interface problems that occur in complex activities.

To help minimize the effects of these major contributors and improve authorization and control of activities to avoid unnecessary challenges to safety systems, we are taking the following actions:

1. During the normal procedure review and/or validation process, efforts are being taken to ensure that the procedures meet the specified minimum requirements for continued use and that they adequately identify required or interfacing systems (configuration

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control). Any abnormal configuration noted will require that an evaluation be performed by knowledgeable personnel to determine if the procedure should be withdrawn from and/or changed prior to use. Additionally, this evaluation will determine if the test or procedure could adversely impact the Plant.

2. During the normal procedure review and/or validation process, those procedures of a critical or complex nature will be evaluated for increased use of the double/independent verification process. This will help ensure that potential "trouble spots" will receive the level of attention necessary to prevent or minimize an unintentional action that could lead to an unnecessary challenge to a safety system.
3. Training of personnel who will be performing critical or complex tasks will be enhanced. This enhancement will be performed in concert with the INPO accreditation effort currently underway. By enhancing the departmental training programs "personnel error" caused events should be minimized.
4. In the event that an unnecessary challenge does occur, a thorough review will be performed to identify and correct the root cause(s). Included with this review will be identifying such topics as previous occurrences, hardware and software deficiencies, and personnel and procedure deficiencies. This review will identify the effectiveness of our efforts as stated above and will also identify any additional problem areas that may require some form of corrective action.

In addition, on January 3, 1986, the Assistant Plant Manager-Maintenance directed that specific task teams be established for completing complex activities during the upcoming Unit 2 refueling outage. These task teams will:

- be in place one week prior to the scheduled event;
- perform a Job Order/clearance audit each day prior to the task and have total control for authorizing or delaying work until after the major evolution (e.g., critical path item) is completed;
- insure task boundaries are clearly displayed

We believe the above actions will provide the necessary authorization and coordination required to insure that complex activities are performed in a safe and reliable manner.

1. The first part of the report deals with the general situation of the country and the position of the various groups of the population. It is a very general and superficial treatment of the subject, but it is a good starting point for a more detailed study.

2. The second part of the report deals with the economic situation of the country. It is a very general and superficial treatment of the subject, but it is a good starting point for a more detailed study.

3. The third part of the report deals with the social situation of the country. It is a very general and superficial treatment of the subject, but it is a good starting point for a more detailed study.

4. The fourth part of the report deals with the political situation of the country. It is a very general and superficial treatment of the subject, but it is a good starting point for a more detailed study.

5. The fifth part of the report deals with the cultural situation of the country. It is a very general and superficial treatment of the subject, but it is a good starting point for a more detailed study.

6. The sixth part of the report deals with the military situation of the country. It is a very general and superficial treatment of the subject, but it is a good starting point for a more detailed study.

7. The seventh part of the report deals with the foreign relations of the country. It is a very general and superficial treatment of the subject, but it is a good starting point for a more detailed study.

8. The eighth part of the report deals with the internal security of the country. It is a very general and superficial treatment of the subject, but it is a good starting point for a more detailed study.


9. The ninth part of the report deals with the future of the country. It is a very general and superficial treatment of the subject, but it is a good starting point for a more detailed study.

Mr. James G. Keppler

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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 *RBK*
Vice President *3/5/86*

MPA/rjn

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

