

NOTICE OF VIOLATION

Indiana Michigan Power Company
D.C. Cook

Docket Nos. 50-315; 50-316
Licenses No. DPR-58; DPR-74

As a result of the inspection conducted on February 9-15, 1989, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1988), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion V, requires in part that activities affecting quality shall be prescribed in documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Procedure 2-THP-4030 STP.202, "CILRT," Appendix F provides instructions regarding valve lineup for the containment integrated leak rate tests.

Contrary to the above, on February 11, 1989, the licensee failed to adhere to Procedure 2-THP-4030 STP.202 as it pertained to control of the test configuration of the weld channel pressurization system. Specifically, four valves were found to be mispositioned during the temperature stabilization period.

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

- B. 10 CFR 50, Appendix J, Paragraphs III.B.3.(a) and III.C.3 require that the combined leakage rate of all penetrations and valves subject to Type B and C tests shall be less than 0.6 La. The NRC has for many years accepted the use of "the maximum pathway methodology" as embodying sufficient conservatism to satisfy the requirements of Appendix J.

Contrary to the above, the licensee did not use the maximum pathway methodology to determine if its Type B and C test results met the acceptance criteria of < 0.6 La. The licensee has continued to use the minimum pathway methodology even though it had been informed in 1985 (Inspection Report No. 50-315/85025; 50-316/85025) that its methodology did not meet the requirements of Appendix J.

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

- C. 10 CFR 50, Appendix J, Paragraphs III.B.2 and III.C.2 require that all Type B and C tests be performed at a pressure of Pa. For this plant, Pa is 12 psig.

Contrary to the above, neither the licensee's Type B and C Test Procedure 1THP 4030 STP.203, Rev. 10, nor the licensee's testing practices, ensure that the penetration or valves being leak rate tested is at Pa since the pressure being monitored at the test rig does not account for the pressure drop due to the makeup flow (leakage) between the test implementation and the penetration/valve under test.

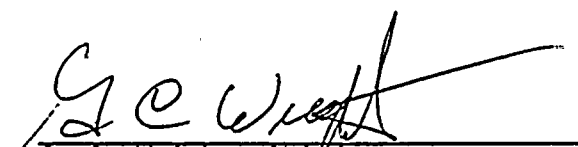


For example, the test performed on November 15, 1989, on Penetration CPN-74 (a small volume penetration) showed a recorded test pressure of 12 psig at the test rig while the penetration leaked at a rate of .34,000 sccm. This had been shown earlier to be physically impossible.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated _____



G. C. Wright, Chief
Operations Branch