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SUBJECT: Responds to NRC 890407 ltr re violations noted in Insp Repts
 50-315/89-09 & 50-316/89-09.

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Indiana Michigan
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P.O. Box 16631
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AEP:NRC:1090B

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. 50-315/89009 (DRP) AND
50-316/89009 (DRP); RESPONSE TO VIOLATION

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

Attn: A. B. Davis

May 11, 1989

Dear Mr. Davis:

This letter is in response to W. L. Axelson's letter dated April 7, 1989, which forwarded the report on the routine safety inspection conducted by members of your staff. This inspection was conducted from February 8 through March 21, 1989 on activities at the Cook Nuclear Plant. The Notice of Violation attached to Mr. Axelson's letter identified one violation associated with the performance of maintenance activities. 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
A. B. Davis - Region III
NRC Resident Inspector - Bridgman

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ATTACHMENT TO AEP:NRC:1090B
RESPONSE TO NOTICE OF VIOLATION

NRC VIOLATION

"Units 1 and 2 Technical Specifications 6.8.1.a require written procedures shall be established covering items recommended in Appendix "A" of Regulatory Guide 1.33, November 1972, which includes (at Section I.1) procedures for maintenance activities involving more than "skills normally possessed by qualified maintenance personnel". Technical Specification 6.8.2 requires these procedures shall be reviewed by the PNSRC and approved by the Plant Manager prior to implementation.

- A. Contrary to the above, maintenance of a unique kind, involving safety related Unit 1 4KV breaker triggering mechanism inspection, cleaning and lubrication, was performed on February 21, 1989, and other dates pursuant to a "guideline" which had neither been reviewed by PNSRC nor approved by the Plant Manager prior to implementation.
- B. Also contrary to the above, maintenance of a unique kind, involving safety related Unit 2 main steam stop valve hydraulic actuator pressure relief valve setting, was performed on March 2, 1989 pursuant to a "guideline" which had neither been reviewed by PNSRC nor approved by the Plant Manager prior to implementation.

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

RESPONSE TO VIOLATION

We believe that the work performed in the two instances cited was in accordance with Technical Specification (T/S) 6.8.1 and our commitment to Reg. Guide 1.33. As noted in the text of the NRC Inspection Report, the Guidelines were appropriately researched and followed, the work was documented on individual Job Orders, and the information is retrievable. This is consistent with the requirements of the governing approved plant procedure (PMI-2290) which provides for performance of maintenance activities in accordance with documented instructions traceable to approval by the Cognizant Engineer. This requirement has been implemented in the past as a standard maintenance practice, and was formally adopted in Revision 8 to PMI-2290 which was effective March 1, 1989. In the case of the 4KV breaker inspection cleaning and lubrication, the instructions contained in the Guideline for cleaning and relubricating the triggering mechanism were taken from written instructions received directly from the

manufacturer's representative and received written concurrence from the AEPSC Cognizant Engineer. The Guideline for maintenance on the Unit 2 main steam stop valve pressure relief valve was taken from the vendor's technical manual which had also been formally approved by the Cognizant Engineer. It should also be noted that with regard to the 4KV breaker maintenance, the cleaning and lubrication of breakers is a frequently performed task. The Guideline used for performance of this maintenance activity did not require maintenance personnel to perform any tasks beyond those that could be expected to be performed during any breaker maintenance. The distinction in the cited instance is that prior to initiation of the maintenance activity a specific lubricant type and breaker cycling requirement was specified. The actual application of the lubricant and cycling of the breakers are both activities that fall within the skills normally possessed by qualified maintenance personnel.

(1) Corrective Actions Taken and Results Achieved

As noted above, we believe that the work performed in the instances cited was in accordance with the applicable approved plant procedures and T/S requirements. In addition, it is noteworthy that the inspection report acknowledges that the work was completed using technically clear and correct instructions.

(2) Corrective Action Taken to Avoid Further Violation

We recognize the value of including in formal procedures those guidelines generated for the performance of infrequent tasks of a limited scope as well as relevant portions of those generated during pre-planning of more complex work activities (as noted in the NRC inspection report for example, we plan to incorporate the breaker linkage cleaning and lubrication Guideline into an existing plant procedure which addresses periodic breaker inspection and cleaning activities). We will continue this practice in the future. We will review PMI-2290 to identify any areas in the procedure that can be expanded to provide a clearer distinction between activities requiring a formally approved procedure and those for which Guidelines are appropriate. The results of our review will be provided to the Inspector to ensure that any remaining NRC concerns have been adequately addressed.

(3) Date When Full Compliance Will Be Achieved

The activities discussed in (2) above will be completed by June 30, 1989.