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SUBJECT: Responds to violations noted in Insp Repts 50-315/89-25 & 50-316/89-25.

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Power Company
P.O. Box 16631
Columbus, OH 43216

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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 50-315/89025(DRS) AND 50-316/89025(DRS);
SPECIAL SAFETY INSPECTION BY NRC AUGMENTED INSPECTION TEAM
(AIT) AUGUST 15 THROUGH 18, 1989

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

Attn: A. B. Davis

October 25, 1989

Dear Mr. Davis:

The purpose of this letter is to respond to the Inspection Reports 50-315/89025 and 50-316/89025. Although the augmented inspection team (AIT) did not identify any violations of NRC requirements during the course of the inspection, we were requested to provide additional information. Our response to the four issues identified in Item 9 of the inspection report are as follows.

9. (a) Confirm the failure mode of SCR 209. In this regard, the licensee has retained their contractor (SCI) to confirm the failure mode of the SCR and to determine if the bent pin found on SCR 209 was or was not a contributor to failure.

Response

(a) The failed silicon controlled rectifier (SCR 209) was returned to Solidstate Controls (SCI) on August 18, 1989 by AEPSC. SCI has sent the SCR to the manufacturer (International Rectifier) for test and failure analysis. The manufacturer has stated that the bent pin lead did not contribute to the SCR failure. SCI has also reviewed the history of similar devices and could not find a record of like failures. Based on the lack of findings SCI has determined that our SCR failure was of a random mode.

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9. (b) Review the loads supplied by CRIDs I, II, and III to determine if there are other loads which, upon failure of the CRID, would cause a loss of all channels of a indication to the control room operators (such as steam generator wide range level indication with failure of CRID IV).

Response

(b) On August 14, 1989, failure of a Silicon Controlled Rectifier in Unit 2 CRID IV static transfer switch resulted in the loss of all four (4) Unit 2 steam generator wide range level indicators. All four (4) process indicating loops had been powered from the same CRID. With the loss of CRID IV all steam generator wide range level indication was lost. A design change is underway to remedy this situation.

In order to determine if there were any other Control Room indicators performing the same function and powered from one CRID (as exampled above), a design study was conducted on all CRIDs from both Units 1 and 2. The study concluded that only the steam generator wide range level indicators were in this configuration. No further design changes are expected.

9. (c) Determine the feasibility of a preventive maintenance/ surveillance procedure to check the operation of the static switch and its power supplies prior to transfer from the alternate to normal power supply subsequent to an automatic transfer from normal to alternate. If such a test is feasible, the licensee will also consider incorporating this test into a periodic test possibly performed every refueling outage.

Response

(c) Engineering guidelines for testing CRID Inverters following transfer to alternate source were provided to the plant. Based on these data, plant I&C has developed a step-by-step signoff/verification draft procedure for checking the 7.5 KVA inverter prior to switching back from alternate source to normal power supply. If necessary the draft procedure will be used to check operation of the Static Transfer Switch subsequent to automatic transfer from normal to alternate at Unit power. The procedure will be finalized and approved by November 15, 1989.

Preventive Maintenance (PM) Cards currently specify a check of "output voltages, currents, and frequencies" for the CRID inverters during refuel outage (Item #2). That PM Card has been expanded to include a check during refuel outage of the Static Transfer Switch output voltage with the push button in the "alternate to load" position.

9. (d) In addition to the above, the following items will be reviewed in a subsequent inspection to determine if the licensee's corrective actions to these items are acceptable to Region III and meet appropriate regulatory requirements:

(1) Guidance and/or training provided by the licensee to plant operators regarding the use of the AMSAC system.

(2) The maintenance program and the training to maintenance mechanics with regard to the maintenance activities performed on check valve FW 103.

Response

(d)(1) The lesson plan on AMSAC (RQ-C-1474) has been upgraded to include the fact that the AMSAC and the turbine solenoid trip utilize the same mechanism. System operation and circuitry are also provided in this lesson plan.

Procedural guidance for manual activation of the system is not provided. The system was and is intended to be an automatic system. Operators are trained on the initiating sequences and setpoints. In the event an auto actuation did not occur, but was challenged, it is the responsibility of the reactor operator to manually actuate the system. This guidance is generic when any safeguard system setpoint is challenged but does not auto actuate. Therefore no specific procedural guidance is deemed necessary.

As an interim training measure, an Operating Memo as well as a design change summary were issued immediately to inform operators of the operation of the AMSAC system until the aforementioned lesson plan was revised.

Additional training on the plant specific simulator will also be provided following the annual simulator upgrade estimated for completion on October 1, 1990. Currently the controls associated with the AMSAC system are not resident on the simulator.

(d)(2) Feedwater system check valves FW-103E and FW-103W are included in the check valve PM Inspection Program established in response to INPO SOER 86-03, "Check Valve Failure or Degradation." The exact cause for the bushing failure in the power assist portion of the FW-103W is not known. We have reviewed our lesson plan for check valve repair, however, and believe the lesson plan is adequate.

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

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
R. C. Callen
G. Charnoff
NFEM Section Chief
T. E. Murley
NRC Resident Inspector - Bridgman