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SUBJECT: Responds to NRC 891206 ltr re violations noted in Insp Rept 50-315/89-29.

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AEP:NRC:1090L

Donald C. Cook Nuclear Plant Unit 1
Docket No. 50-315
License No. DPR-58
NRC INSPECTION REPORT NO. 50-315/89029 (DPR)

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

Attn: Mr. A. B. Davis

January 5, 1990

Dear Mr. Davis:

This letter is in response to Mr. W. L. Axelson's letter dated December 6, 1989, which forwarded the report on the routine safety inspection conducted by the resident inspectors. This inspection was conducted October 4 through November 16, 1989, on activities at the Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Axelson's letter identified one Severity Level IV violation. The violation is addressed in the attachment to this letter.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,

M. P. Alexich
Vice President

ldp

cc: D. H. Williams, Jr.
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ATTACHMENT TO AEP:NRC:1090L
RESPONSE TO NRC NOTICE OF VIOLATION

VIOLATION

"Unit 1 Technical Specification Limiting Condition for Operation 3.5.2 requires two independent ECCS subsystems shall be OPERABLE in MODES 1, 2 and 3, with ACTION stipulations limited to the case of one ECCS subsystem inoperable. Unit 1 Technical Specification 3.0.3 requires, when a Limiting Condition for Operation is not met (e.g., neither ECCS subsystem OPERABLE) except as provided in associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the specification does not apply.

Contrary to the above, on September 13, 1989, Unit 1 was in MODE 1 for one hour and eight minutes with neither independent ECCS subsystem OPERABLE. One subsystem (Train A) was inoperable due to ongoing maintenance on safety injection pump 1N, while the other (Train B) was inoperable due to testing conditions which defeated the Train automatic actuation logic. Action was not initiated within one hour to place the unit in a MODE in which the Specification did not apply.

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

RESPONSE TO VIOLATION

On September 13, 1989, it was identified that the Unit 1 Train B safety injection (SI) pump had been made inoperable by solid state protection system (SSPS) surveillance testing, while the Train A SI pump was isolated for valve leak repairs. This event occurred because the testing and maintenance was scheduled for the same day, the surveillance procedure did not contain guidance to ensure that opposite train equipment is operable, and the Shift Supervisor and Unit Supervisor failed to recognize that the Train B SI pump would be made inoperable by the SSPS testing.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The involved Unit 1 surveillance procedures (1-THP 4030.STP.410 and 1-THP 4030.STP.411) were revised on September 21, 1989, to add a requirement for the Shift Supervisor to ensure that the opposite train equipment is operable. The Unit 2 procedures did not require revision because they had been previously revised to include the requirement. Also, a memorandum was issued to Operations Department personnel as a reminder of the requirement for maintaining opposite train equipment operable during SSPS testing on the other train.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATION

1. Prior to this event, the instrumentation surveillance schedules were not used as an integral part of the routine daily work coordination process. In response to this event, the job planners have been given direction to consider the surveillance schedules as an integral part of the routine work coordination process. Additional reviews of the work planning process have been conducted and further actions are being planned to improve the planning and scheduling process.



2. An administrative control (PMSO 113) was placed in effect on November 22, 1989, that requires personnel to review surveillance test procedures prior to their use on operable equipment during unit operation to ensure that the procedure specifies what equipment will be made inoperable by the test. This review involves a significant effort consisting of a thorough review by the group responsible for the procedure, which is followed by reviews from two licensed Senior Reactor Operators. The majority of applicable procedures used on a routine basis have been reviewed and have been revised as needed. The remaining applicable procedures will be reviewed, as required by PMSO 113, prior to their use.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on September 13, 1989, when the Train B SSPS testing was completed, which restored on Train B SI pump automatic start capability.