

6/1/90

TUN :

Docket No. 50-315
Docket No. 50-316

Indiana Michigan Power Company
ATTN: Mr. Milton P. Alexich
Vice President
Nuclear Operations Division
1 Riverside Plaza
Columbus, OH 43216

Gentlemen:

Reference: Letter dated April 11, 1990 (AEP:NRC:1125A), M. P. Alexich
to A. B. Davis

Thank you for your letter dated April 11, 1990, informing us of the steps you have taken to correct the weaknesses and violations that we brought to your attention in our letter dated March 1, 1990, that conveyed the results of a special maintenance team inspection conducted at the D. C. Cook plant. Also, the meeting conducted with Mr. T. P. Beilman and others of your staff held in the Region III office on May 9, 1990, contributed to a mutual understanding and clarification of our report and your response to the report.

Based on your response and the results of the meeting, we have no further questions regarding the weaknesses and the following violations 1.a., 1.c., 1.e, 1.f., 2., and 4.b. It is our understanding that the following actions will be taken for the remaining items:

- ° 1.b. You will provide us more information about the significance of the thermal overload problem by increasing the scope of your sample size.
- ° 1.d. You will correct the apparent dichotomy between the procedures for the turbine and motor driven auxiliary feedwater pumps and provide information about the existing surveillance procedures that assure proper pump packing adjustment. We also believe this to be a "skill of the craft" issue; therefore, the violation in Item 1.d. has been rescinded.
- ° 1.g. You recently provided us with information regarding the biannual review of procedures that existed during the inspection; therefore, the violation in Item 1.g. has been rescinded.

9006110335 900601
PDR ADCK 05000315
Q FDC

IE01 11

001/10

3. You will provide us with information regarding how your electrical testing techniques will be improved, and whether any other test gear is in use at D. C. Cook whose usage may date from initial startup and where the reason for usage cannot be determined (as you stated for the voltmeter in question). For any other misapplication of Measuring and Test Equipment (M&TE) usage, you need to provide corrective actions to ensure similar problems are not experienced with other M&TE usage.
- 4.a. We acknowledge that in some instances the Notice of Violation and our report contained errors; specifically item 706162 on Pages 23 and 24. For example, circuit breaker T-1104 is actually T-1104; the "Plant Assessment Group" is actually the "Problem" Assessment Group; the Problem Assessment Group's assessment of problem report 89-245 was mischaracterized by us as "insignificant" when, in fact, the actual assessment was "not significant", which is an administrative designation rather than a technical one; you, not the vendor, issued the 10 CFR 21 report, even though two of the problem reports stated that the vendor had issued the report; although the dates are correct, all are not in chronological order; and problem report 89-250 and all associated information is incorrectly included with the other breakers that failed due to hardening of linkage grease. As a result of these errors and additional information presented during our meeting, we have concluded that the example of violation (4.a.) is incorrect as written and therefore, 4.a. has been rescinded.

However, despite these inaccuracies, we are still concerned about the adequacy of your actions to correct problems with 4 kV circuit breakers on Unit 1 while the unit was in operation, considering that some breakers failed to operate during tests even after the vendor recommended interim lubrication was applied. The specific failures were: breaker T11D11 (East MDAFP) on March 17, 1989; breaker T11A2 (West MDAFP) on April 7, 1989; and breaker T11D1 (EP Feed) on April 26, 1989. If needed in an emergency, these specific breakers may have failed to close on demand. Our concern relates to your explanation at our meeting that these failures were related to incorrect performance of the interim lubrication process by a specific crew. In your response, please address these failures, their cause, operability of the unit during the period the questionable conditions existed, and your corrective actions to prevent recurrence. We also questioned your long term actions for Unit 2 breakers considering that the interim lubrication method did not appear to be effective in some cases for Unit 1. This situation was aggravated by the apparent discrepancies in the vendor's manual about lubrication types and methods. We have recently received your information regarding our operability concerns of Unit 2 4kV circuit breakers. Based on vendor's acceptability of the use of the Anderol 732 temporary lubricant, the

understanding that the breakers will be cleaned and relubricated with Anderol 757 at the next scheduled maintenance period, your explanation of upgraded interim lubrication performance on Unit 2, and a history of no failures on Unit 2, we have no further concerns regarding the operability of the Unit 2 4kV breakers. However, we request that you address the differences in the test methodology used when the Unit 1 breakers were tested in early 1989 during preventive maintenance (outside the cubicle) and failed, as compared to when the breakers were tested inside the 4.16kV cubicle and did not fail. Also, include probable cause for failure outside the cubicle.

You are requested to respond within 30 days of receipt of this letter. We will gladly discuss any questions you have concerning these matters.

Sincerely,

ORIGINAL SIGNED BY ROBERT J. MILLER

H. J. Miller, Director
Division of Reactor Safety

cc: A. A. Blind, Plant Manager

cc w/ltr dtd 04/11/90:
DCD/DCB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
James R. Padgett, Michigan Public
Service Commission
EIS Coordinator, USEPA
Region 5 Office
Michigan Department of
Public Health
Project Manager, NRR

yes
REPLYING
5/23/90

RIII
JK
Falevits/jk
05/23/90
yes

RIII
RM
Mendez
05/ /90
yes

RIII
BB
Burgess
05/24/90

RIII
J
Jabonski
05/23/90
yes

RIII
MR
Ring
05/25/90
yes

RIII
gm
Martin
06/1 /90

RIII
jm
Miller
05/1 /90