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SUBJECT: Responds to NRC 940627 ltr re violations noted in insp repts
50-315/94-09 & 50-316/94-09 from 940423-0603. Corrective
action: corrected test data package for 1-QMO-225.

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Indiana Michigan
Power Company
P.O. Box 16631
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AEP:NRC:1212F
10 CFR 2.201

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 REPORTS NO. 50-315/94009 (DRP)
AND 50-316/94009 (DRP)
REPLY TO NOTICE OF VIOLATION

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

Attn: Mr. J. B. Martin

July 26, 1994

Dear Mr. Martin:

This letter is in response to a USNRC letter dated June 27, 1994, that forwarded a notice of violation to Indiana Michigan Power Company. The notice of violation contained one violation identified during a routine safety inspection conducted by Messrs. J. A. Isom, D. J. Hartland, C. A. Gainty, J. G. Guzman, and E. R. Schweibinz from April 23, 1994, through June 3, 1994. The violation is associated with the failure to perform an engineering evaluation of a motor-operated valve (MOV) that was in an over-thrust condition.

Our reply to the notice of violation is provided in the attachment to this letter.

The inspection report also contained two general concerns with regard to the acceptance criteria used for MOV tests. These concerns are also addressed in the attachment to this letter.

This letter is submitted pursuant to 10 CFR 50.54(f) and, as such, an oath statement is attached.

Sincerely,

E. E. Fitzpatrick
Vice President

ar

9408010247 940726
PDR ADOCK 05000315
PDR

Mr. J. B. Martin

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AEP:NRC:1212F

Attachments

cc: A. A. Blind
G. Charnoff
W. T. Russell, NRC - Washington, D.C.
NRC Resident Inspector
NFEM Section Chief
J. R. Padgett

STATE OF OHIO)
COUNTY OF FRANKLIN)

E. E. Fitzpatrick, being duly sworn, deposes and says that he is the Vice President of licensee Indiana Michigan Power Company, that he has read the forgoing response to NRC INSPECTION REPORTS NO. 50-315/94009 (DRP) AND 50-316/94009 (DRP), REPLY TO NOTICE OF VIOLATION and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

E. E. Fitzpatrick

Subscribed and sworn to before me this 26th
day of July, 19 94.

Rita D. Hill
NOTARY PUBLIC

RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-27-99

ATTACHMENT TO AEP:NRC:1212F

REPLY TO NOTICE OF VIOLATION

Background

A routine safety inspection was conducted by Messrs. J. A. Isom, D. J. Hartland, C. A. Gainty, J. G. Guzman, and E. R. Schweibinz from April 23, 1994, through June 3, 1994.

During this inspection, one item was found to be in violation. The violation was identified as the failure to perform an engineering evaluation of a motor-operated valve (MOV) that was in an over-thrust condition.

This violation was set forth in a letter containing the notice of violation, dated June 27, 1994, from Mr. E. G. Greenman, Director, Division of Reactor Projects, USNRC, Region III. The letter was received June 30, 1994. Our response to the notice of violation is contained within this document.

The inspection report also contained two general concerns with regard to the acceptance criteria used for MOV tests. These concerns are also addressed in this attachment.

NRC Violation

"10 CFR 50, Appendix B, Criterion XI, requires, in part, that measures be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. Test results shall be documented and evaluated to assure that test requirements have been satisfied.

Contrary to the above, the review process completed on June 25, 1993, following dynamic testing of MOV 1-QMO-226 on May 14, 1993, did not evaluate and document the basis for acceptance of the test when the maximum thrust requirements were exceeded and test requirements were not satisfied. As of April 4, 1994, this evaluation was still not completed. (50-315/94009-03(DRS))

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

Response to Violation**1. Admission or Denial of the Alleged Violation**

Indiana Michigan Power Company admits to the violation as cited in the NRC notice of violation.

2. Reasons for the Violation

The procedure (12 IHP 5030.EMP.002, "MOV Diagnostic Testing - VOTES") for conduct of the test and review of test data did not specifically require that a formal justification be documented for out-of-tolerance performance noted during the testing, only that the test be reviewed and accepted. The plant engineering department reviewed the test data and determined from evaluation of past, similar test results and vendor documentation that the MOV performance was adequate, but failed to document the justification for accepting the MOV performance with the over-thrust condition.

3. Corrective Actions Taken and Results Achieved

The over-thrust condition on 1-QMO-225 and -226 has been formally reviewed and documented via condition report 94-0824. It has been determined that no MOV performance problem exists due to the over-thrust condition. It was noted in the inspection report that "a subsequent review found that this condition was acceptable."

The test data package for 1-QMO-226 will be corrected to include the documented test data evaluation and conclusion. This correction will be made prior to September 15, 1994.

4. Corrective Actions Taken to Avoid Further Violations

Procedure 12 IHP 5030.EMP.002 was revised on June 10, 1994, with the issuance of Revision 2, Change Sheet 5. This procedure now requires that the justification for acceptance of any test discrepancies be documented in the remarks section of the procedure.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved on September 15, 1994, with the completion of the correction to the data package to include the documented test data evaluation and conclusion for the May 14, 1993, test of 1-QMO-226.

Response to Concerns

The inspectors noted two general concerns with regard to the acceptance criteria used for differential pressure tests. These concerns affected both Operations Analysis and Testing Interpretive System (OATIS) and Valve Operation Testing and Evaluation System (VOTES) test data, and are being investigated under condition report 94-0699. These concerns are as follows.

- (1) The licensee could not demonstrate that there was sufficient margin between torque switch trip (VOTES point C14) setpoint and the torque observed at the valve at the extrapolated 100 percent flow cutoff (C10) point. Typically, this setpoint includes inaccuracies to account for torque switch repeatability and the switch degradation.
- (2) The OATIS test data was not completely evaluated to compare torque switch settings to extrapolated thrust requirements due to the limitations of the data. For MOVs tested at less than full design basis differential pressure (DP), the evaluation was necessary to determine the ability of the MOV to function at full DP.

Immediately following the April 1994 inspection, a consultant was hired to assist in an independent review of our differential pressure test data, methods of margin analysis and acceptance criteria, and to compile industry information to assist in validating programmatic assumptions. These reviews have been completed, the results have been evaluated and are currently in the process of final verification. The data review for the sixty applicable OATIS and VOTES differential pressure tests conducted to date have been adjusted to include accuracies to account for torque switch repeatability and actuator degradation in the margin between extrapolated flow cutoff and torque switch trip. The preliminary (until verified) results show that, with two exceptions, there is sufficient margin between flow cutoff and torque switch trip to account for torque switch repeatability and actuator degradation. The two exceptions have small positive margins and do not present operability concerns because of the availability of additional thrust due to inertial loads, but will require design changes or torque switch resetting to achieve compliance with Generic Letter

89-10. The disposition of these two exceptions is still under investigation.

The two concerns identified in the inspection report by the NRC inspectors, as well as the degraded voltage relay setting concern, are being addressed by re-evaluating completed differential pressure test data and by incorporating revised acceptance criteria into the data review procedure. The applicable differential pressure test data reviews are scheduled to have final verification complete by July 29, 1994. The revised differential pressure test review procedure is scheduled to be issued by August 15, 1994.

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