

NOTICE OF VIOLATION

Indiana Michigan Power Company
Donald C. Cook Nuclear Power Plant

Docket No. 50-315; 50-316
License No. DPR-58; DPR-74

During an NRC inspection conducted from February 17, 1997 to March 29, 1997 four violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

1. 10 CFR 50 Appendix B, Criteria V, Inspections, Procedures, and Drawings, requires in part, that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Contrary to the above,

- a. The inspectors identified that Procedure 02-OHP 4023.ES-01, "Reactor Trip Response", revision 11, dated 11/21/96, was not appropriate to the circumstances because it did not contain guidance for adequately controlling steam generator (SG) levels while actions were being taken to minimize the reactor coolant system cooldown rate. As a result, on March 11, 1997, a Unit operator reset a turbine driven auxiliary feed pump (TDAFP) too close to the low-low SG level setpoint which resulted in an inadvertent Engineering Safeguard Feature actuation.
- b. On March 23, 1997, the inspectors identified that the licensee failed to follow instructions when personnel working adjacent to the refueling cavity in a foreign material exclusion zone, failed to secure light hand tools to themselves by way of a lanyard or tagline, and failed to restrain tools in the FMEZ when they set the tools down. These actions were required by Plant Manager's Instruction (PMI) 2220, "Foreign Material Exclusion", revision 9, dated 3/26/96.
- c. On March 11, 1997, the licensee identified that during refurbishment of 1-QRV-114, the reactor coolant excess letdown to excess letdown heat exchanger shutoff valve, in 1994, the valve was reassembled without a cage spacer that was required by maintenance procedure 12 MHP-5021.001.057, "Copes-Vulcan Isolation Valve Maintenance" revision 1, dated 3/14/97.
- d. On March 16, 1997, the licensee identified that during the 1995 refurbishment of 1-NRV-163, the pressurizer spray control valve, the valve was reassembled without a cage spacer that was required by maintenance procedure 12 MHP-5021.001.126, "Copes-Vulcan Bellows Seal Control Valve Maintenance", revision 1, dated 3/13/97.

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



2. 10 CFR 50 Appendix B, Criteria XVI, Corrective Actions, requires in part, that "Measures shall be established to assure that . . . In the case of significant conditions adverse to quality, the (corrective) measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Contrary to the above,

- a. On March 11, 1997, in Unit 2, the previous corrective actions to preclude the buildup of electrostatic discharge from affecting Taylor Mod 30 controllers were ineffective in preventing the failure of the controller for feedwater regulating valve 1-FRV-210. This controller failure caused the closure of 1-FRV-210 and a subsequent reactor trip.
- b. On March 12, 1997, the inspectors identified that the corrective actions following a repeat gasket failure on 1-IRV-311, identified on January 31, 1996, were inadequate to preclude repetition of spiral wound gasket material entering the reactor coolant system, a significant condition adverse to quality. Specifically, the licensee performed an evaluation to determine the effect of spiral wound gasket material in the residual heat removal system; however, no action was taken to remove this material which resulted in the re-introduction of spiral wound gasket material in the reactor coolant system on March 12, 1997.

This is a Severity Level IV violation (Supplement I)

3. 10 CFR Part 50.72, paragraph (b)(2)(i), requires that any event, found while the reactor is shut down, that, had it been found while the reactor was in operation, would have resulted in the nuclear power plant, including its principal safety barriers being in an unanalyzed condition that significantly compromises plant safety, be reported to the NRC within four hours of occurrence.

Contrary to the above, the licensee failed to make a timely report in accordance with 10 CFR 50.72(b)(2)(i) when on March 21, 1997, inspection of flood-up tubes in Unit 1 identified cracks in nine tubes and the equipment associated with these flood-up tubes was declared inoperable.

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

4. 10CFR 50.59 Changes, Tests and Experiments, section (b)(1), requires in part that the licensee shall maintain records of changes in the facility and that these records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, on March 6, 1997, the licensee identified that a plexiglass cover was installed below the return air duct to the Unit 2 control room without a proper 50.59 safety evaluation. This plexiglass cover had the potential of affecting the operability of the Unit 2 control room emergency ventilation system (CREVS).

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

Pursuant to the provisions of 10 CFR 2.201, Indiana Michigan Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the parts that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle, Illinois
this 6th day of May 1997

