

DOCKET NO. 50-316  
DATE: 9-12-78

NOTE TO ERG AND/OR LOCAL PUBLIC DOCUMENT ROOMS

The following item submitted with letter dated 8-18-78  
from IN+MI PWR is being withheld from  
public disclosure, pending review, in accordance with Section 2.790.

PROPRIETARY INFORMATION

REMEDIAL OPERATOR ACTION TO BE TAKEN  
FOLLOWING A POSTULATED LOCA OR POSTULATED  
SECONDARY SIDE BREAK & JUSTIFIC

Roland Wood  
O/K  
Regulatory File Room

Booster

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)  
DISTRIBUTION FOR INCOMING MATERIAL

50-315/316

REC: DENTON H R  
NRC

ORG: TILLINGHAST J  
IN & MI PWR

DOCDATE: 08/16/78  
DATE RCVD: 08/21/78

DOCTYPE: LETTER NOTARIZED: YES

COPIES RECEIVED

SUBJECT: LTR 1 ENCL 0

FURNISHING INFO CONCERNING DIFFERENCE IN CONFIGURATION OF SILICONE FOAM FIRE  
SEALS BETWEEN UNIT 1 & 2, AND THE ASTM E119 TEST CONDUCTED ON  
01/12/78... NOTARIZED 08/16/78.

*Jgm*

PLANT NAME: COOK - UNIT 1  
COOK - UNIT 2

REVIEWER INITIAL: XJM  
DISTRIBUTER INITIAL:

\*\*\*\*\* DISTRIBUTION OF THIS MATERIAL IS AS FOLLOWS \*\*\*\*\*

NOTES:  
I & E - 3 CYS ALL MATERIAL

FIRE PROTECTION INFORMATION (AFTER ISSUANCE OF OL).  
(DISTRIBUTION CODE A006)

FOR ACTION: BR CHIEF ORB#1 BC\*\*LTR ONLY(4)

INTERNAL:	REG FILE**LTR ONLY(1)	NRC PDR**LTR ONLY(1)
	<del>I &amp; E**LTR ONLY(2)</del>	OELD**LTR ONLY(1)
	AUXILIARY SYS BR**LTR ONLY(2)	AD FOR SYS & PROJ**LTR ONLY(1)
	PLANT SYSTEMS BR**LTR ONLY(5)	WAMBACH**LTR ONLY(1)
	R. MURANKA**LTR ONLY(1)	HANAUER**LTR ONLY(1)

EXTERNAL: LPDR'S  
ST. JOSEPH, MI\*\*LTR ONLY(1)  
TERA\*\*LTR ONLY(1)  
NSIC\*\*LTR ONLY(1)  
ACRS CAT B\*\*LTR ONLY(16)

DISTRIBUTION: LTR 39 ENCL 0  
SIZE: 2P

CONTROL NBR: 782120342

*MA-4  
SD*

\*\*\*\*\* THE END \*\*\*\*\*

# INDIANA & MICHIGAN POWER COMPANY

P. O. BOX 18  
BOWLING GREEN STATION  
NEW YORK, N. Y. 10004

August 16, 1978  
AEP:NRC:00067

INDIANA & MICHIGAN POWER COMPANY  
BOWLING GREEN STATION  
NEW YORK, N. Y. 10004

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
Silicone Foam Fire Seals

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, Maryland 20014

Dear Mr. Denton:

This letter serves to document a telephone conversation held on June 28, 1978 between Mr. R. J. Daley (AEPSC) and Mr. P. Matthews of the USNRC concerning, (1) the difference in configuration of silicone foam fire seals between Unit No. 1 and Unit No. 2 of the Donald C. Cook Nuclear Plant and, (2) The ASTM E119 Test conducted on January 12, 1978.

The differences between the Unit 1 and Unit 2 fire seals concern caulking methods. In Unit 1, gaps between the cable trays and the opening through which they pass were sealed with a perimeter bead of gun caulk silicone. In Unit 2, the gun caulk silicone was again specified and was applied to a 1" depth over 9" of refractory fiber in the gap. Both of these configurations were tested on January 12, 1978 with the result that no breakthrough of flame or heat occurred over the 3 hour test period. This indicated that the Unit 1 method of perimeter caulking alone would have been sufficient.

The other difference between the Unit 1 and Unit 2 installation concerns a 12" long bead of gun caulk silicone, measured from the face of the opening, to the top and bottom of the joint between the sides of cable trays which are touching. This method was employed in Unit 2 and no problems were encountered with respect to the ASTM E119 test conducted on January 12, 1978. Unit 1 does not have caulking on trays which are similarly arranged and was not tested.

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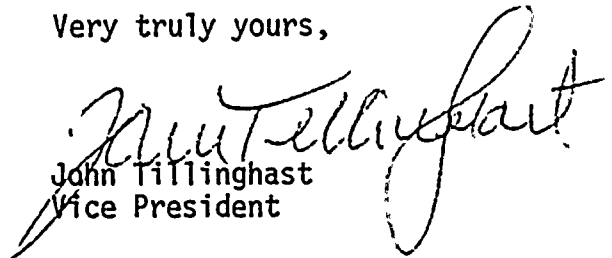
August 16, 1978

AEP:NRC:00067

-2-

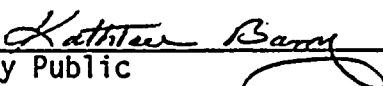
The beads of caulk in the test arrangement, formed a "worst case" condition in that a chimney of varying width was created from the exposed to the unexposed side of the test slab. This configuration was closely watched during the 3 hour test and at no point was flame, smoke, or heat observed on the unexposed side of the test slab. AEPSC therefore concludes that caulking between trays was an unnecessary precaution in Unit 2 and consequently does not propose to backfit the caulking to trays in Unit 1.

Very truly yours,

  
John Tillinghast  
Vice President

JT:em

Sworn and subscribed to before  
me this 16<sup>th</sup> day of August  
1978 in New York County, New York

  
Notary Public

KATHLEEN BARRY  
NOTARY PUBLIC, State of New York  
No. 41-4606792  
Qualified in Queens County  
Certificate filed in New York County  
Commission Expires March 30, 1979

cc: R. C. Callen  
P. W. Steketee  
R. Walsh  
R. J. Vollen  
G. Charnoff  
R. W. Jurgensen  
D. V. Shaller - Bridgman

AUG 16 1978

American Electric Power Service Corporation  
Indiana and Michigan Power Company  
ATTN: Mr. John Tillinghast  
Vice Chairman, Engineering and Construction  
2 Broadway  
New York, NY 10004

Docket No. 50-316

Gentlemen:

An inspection performed at your Donald C. Cook Nuclear Plant, Unit 2 on June 19, 22, 23 and 29, 1978, focused on an event which occurred on June 15, 1978. This event was documented in your report dated June 29, 1978. The event consisted of both emergency diesel generators being removed from service during maintenance while the Unit was operating at 60% power. An item of noncompliance related to this event is set forth in Appendix A to this letter.

Three recent safety-related events at the D. C. Cook Nuclear Power plant, involving incorrect valving and switching of safety-related equipment, indicate an existing deficiency in plant management controls. The first two of these events were discussed by J. G. Keppler, Director, Region III, with you and others of your staff at a meeting on June 16, 1978. The discussion included our concerns that if management action was not taken, increased personnel errors may lead to events of greater safety significance. Because of the significance of this latest event, and in view of the previous meeting on this subject, the enforcement aspects of this case have been escalated from our Regional Office to Headquarters for handling.

The series of three events which occurred since November 1977 is of concern to us. While your letters of June 29, 1978 and June 30, 1978 identify some general as well as specific corrective actions you have already taken or plan to take to improve management controls, your response to the specific item of noncompliance should further amplify your corrective actions as they relate to the following:

1. Specific time tables to accomplish the corrective actions for Items E3 and E4 of Mr. Shaller's June 29, 1978 letter and the corrective actions described in your June 30, 1978 letter.

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OFFICE					
SURNAME					
DATE					

AUG 16 1978

2. Plans for improving your management controls as they relate to both Corporate and Site Management involvement in the review, solution, and followup of corrective actions for problems with safety-related equipment or operations. Of special interest are your plans for improving corporate management involvement in assuring corrective actions for repetitive problems.
3. Plans for improving your site management controls as they relate to the operational and maintenance control of safety-related equipment.
4. Specific plans for improvement in the identification and labeling of equipment, rooms, valves and piping so as to reduce the possibility for personnel operating error.
5. Plans to improve supervision and audit of ongoing operations to insure that operations important to plant safety continue to be properly carried out.

Your response to this letter and the results of future inspections to review your corrective actions will determine if additional escalation of enforcement action is appropriate.

Sincerely,

151

Norman C. Moseley, Director  
 Division of Reactor Operations  
 Inspection  
 Office of Inspection and  
 Enforcement

Distribution

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Enclosure:  
 Appendix A, Notice of  
 Violation

SEE PREVIOUS YELLOW FOR CONCURRENCES

WPU:FT	OFFICE >	ROI 7	ROI	ROI:IE		
8/16/78	SURNAME >	FNolan	J. S. H. zek	N. C. Moseley		
	DATE >	8/16/78	8/16/78	8/16/78		

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Appendix A

NOTICE OF VIOLATION

American Electric Power  
Service Corporation  
Indiana and Michigan Power  
Company

Docket No. 50-316

During an inspection of activities under License No. DPR-74 conducted on June 19, 22, 23 and 29, 1978, the following apparent item of noncompliance was identified. This item is considered to be an infraction.

Technical Specification 6.8.1 requires written procedures be established, implemented, and maintained. Plant Manager Instruction (PMI) 2110, "Equipment Control-Clearance Permit System;" and Plant Manager Procedure (PMP) 2110.CPS.001, "Clearance Permit System," establish the administrative controls for removing equipment from service. The PMP states "A Clearance Permit must be obtained for any work which, for the safety of personnel and equipment, requires a certain definite arrangement or position of controls, circuit breakers, switches, valves, etc." Clearance Permit No. 9350 dated June 15, 1978 was issued to clear the "#2 C-D Diesel." Among other things, the Permit provides for placement of the generator breakers in lockout and removing the starting air pilot valves from service. That same procedure also states "All Clearance points shall be physically reviewed by the person obtaining the Clearance Permit before he accepts the Clearance Permit."

Contrary to the above, on June 15, 1978, when the Unit 2 C-D Diesel generator was being removed from service for maintenance work authorized by Clearance Permit No. 9350, the starting air pilot valves on the A-B diesel generator rather than the C-D diesel generator were removed from service. Also contrary to the above, the person obtaining the clearance permit did not review all clearance points before accepting the clearance permit. This failure to follow procedures resulted in both Unit 2 diesel generators (A-B and C-D) being out of service for approximately three hours while Unit 2 was operating at about 60% power.

As you are aware from the "Criteria for Determining Enforcement Action," which was provided to NRC licensees by letter dated December 31, 1974, the enforcement actions available to the NRC include administrative actions in the form of written notices of violation, civil monetary penalties, and orders pertaining to the modification, suspension or revocation of the license. After careful evaluation of the item of noncompliance set forth above and the enforcement history at the D. C. Cook facility, we conclude that a Notice of Violation is the appropriate action at this time.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's Rules of Practice, Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty (20) days of your receipt of this notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.