

# INDIANA & MICHIGAN ELECTRIC COMPANY

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

September 14, 1982  
AEP:NRC:0735

Donald C. Cook Nuclear Plant Units No. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
IE INSPECTION REPORTS NO. 50-315/82-12 (DPRP) AND  
NO. 50-316/82-12 (DPRP)

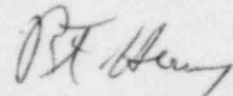
Mr. James G. Keppler, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

The Attachment to this letter provides our response to the Notice of Violation Contained in the Appendix to IE Inspection Reports No. 50-315/82-12 (DPRP) and No. 50-316/82-12 (DPRP).

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.

Very truly yours,



R. F. Hering  
Vice President

/os

cc: John E. Dolan - Columbus  
R. S. Hunter  
M. P. Alexich  
R. W. Jurgensen  
W. G. Smith, Jr. - Bridgman  
R. C. Callen  
G. Charnoff  
Joe Williams, Jr.  
NRC Resident Inspector at Cook Plant - Bridgman

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Attachment to AEP:NRC:0735  
Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Response to Notice of Violation

Item of Noncompliance (Paraphrased)

10 CFR 50, Appendix B, Criterion III states that, "Measures shall be established for the identification and control of design interfaces and for coordination among participating design organizations. These measures shall include the establishment of procedures among participating design organizations for the review, approval, release, distribution, and revision of documents involving design interfaces."

"Design Changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design".

As written in AEPSC General Procedure No. 25, "Engineering Design Changes", "Once the onsite work required to implement the original change has been completed, the RFC cannot be further modified".

Contrary to the above, the NRC inspection found: that a revision was made to RFC DC-02-2248 after work was completed and the RFC was closed; documentation of the revision was not sent to the Plant Outage/Design Change Coordinator; and the revision was not subjected to a review commensurate with the review applied to the original change.

Response to the Item of Noncompliance

The RFC revision mentioned in the report consisted of a change to the mounting brackets for the turbine control and stop valve limit switches.

Our investigation into the circumstances surrounding this occurrence revealed the following:

- 1) Due to high level vibrations, the switches of concern tended to fail after short periods of use. For this reason a new design for mounting these switches was developed and implemented in RFC-DC-02-2248.
- 2) After RFC-DC-02-2248 was installed and closed, some of the turbine control and stop valve limit switches failed again due to high levels of vibration. These failures led to a joint effort, by both the Cook Plant and the Electrical Generation Section in New York to design a new mounting scheme for the switches.

- 3) When the new design of the mounting brackets was completed, it was then reviewed and approved for installation by the cognizant Electrical Generation engineer. The approval for installation was received from the cognizant engineer, Electrical Engineering Division, in a letter dated December 2, 1981. The change was installed as recommended. Both the approval for installation and the installation itself were done in a manner contrary to existing administrative controls placed on performance of such work.

Corrective Action Taken and Results Achieved

To comply with the requirements of existing administrative controls (AEPSC General Procedure No. 25, "Engineering Design Changes"), RFC-02-2611 was initiated to authorize the design change of the mounting system for the stop valve limit switches.

In addition, the Plant Manager will issue by September 30, 1982, a memorandum to all involved Plant Departments re-emphasizing the procedural requirements for installation of any new design changes or revisions to previously approved or installed design changes. By the same date, the AEPSC Manager of Quality Assurance will issue another memorandum re-emphasizing that procedural requirements must be adhered to unless relief is granted by authorized management action.

Date When Full Compliance will be Achieved

Upon review of RFC-02-2611 as per AEPSC General Procedure No. 25, and issuance of the memorandums from the Plant Manager and the AEPSC Manager of Quality Assurance, full compliance will have been achieved.