System NDIANA & MICHIGAN ELECTRIC COMPANY DONALD C. COOK NUCLEAR PLANT P.O. Box 458, Bridgman, Michigan 49106 (616) 465-5901

October 27, 1982

Mr. J. G. Keppler, Regional Director Office of Inspection and Enforcement United States Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, Illinois 60137 Op

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

Dear Mr. Keppler:

This is to confirm our verbal report to Mr. E. R. Swanson, NRC Region III Inspector, on October 27, 1982, at approximately 1200 hours, at which time we informed him that in past instances the Plant had not correctly implemented the Unit One Tech. Spec. 3.3.3.7 (3.3.3.8 for Unit Two) Action Statement requirements in responding to an alarming or defective pyrotronics ionization detector. These detectors are employed in various areas throughout the Plant.

Specifically, there are redundant detectors in each zone's string of detectors. As long as the number of "operable" detectors in a string remained more than the Tech. Spec. minimum, the Tech. Spec. requirements were considered to be satisfied and the Action Statement requirements not applicable. Fire Watches were established for the specific area served by the malfunctioning/alarming detector until repairs were effected, usually a matter of hours.

On October 26, 1982, while reviewing the report of an investigation conducted on a malfunctioning (low set point) detector, it became clear to me that while any detector in a string is alarming on the Control Room annunciator panel, the alarm function of the remaining detectors in the string is blocked, i.e. the string is inoperable from an alarming standpoint. Tech. Spec. Action Statements which have not been implemented in the past in this situation are the establishment of a Fire Watch for the zone served by the affected string and submission of an LER on each occurrence.

Mr. Swanson has been apprised of the immediate corrective actions implemented to prevent a recurrence, which consist of the interim measures of revising the annunciator response procedures to ensure correct response to this condition and the provision of spare detector elements to Operations Department to ensure repairs are effected as rapidly as possible.

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A complete report will be submitted in fourt on (14) days.

Sincerely,

W JSmith W. G. Smith, Jr. Plant Manager

WGS:frb

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