

DMB

42-12
43-13
Docket No. 50-315
Docket No. 50-316

American Electric Power Service
Corporation
Indiana and Michigan Electric Company
ATTN: Mr. John E. Dolan
Vice Chairman
Engineering and Construction
1 Riverside Plaza
Columbus, OH 43216

Gentlemen:

Thank you for your letter dated September 6, 1983, informing us of the steps you have taken to correct the noncompliance which we brought to your attention in Inspection Reports No. 50-315/83-12(DPRP) and 50-316/83-13(DPRP) forwarded by our letter dated August 5, 1983. We will examine these matters during a subsequent inspection.

Additional information concerning Noncompliances 2 and 3 was obtained on September 12, 1983, in a telephone conversation between D. C. Boyd and M. M. Holzmer of this office and M. P. Alexich and R. F. Kroeger of your staff. Concerning Noncompliance No. 2, we understand that you will submit your current quality assurance program description to NRC by September 30, 1983. Concerning Noncompliance No. 3, we understand that your review and other actions to fully implement ANSI N45.2.6 and Regulatory Guide 1.58 will not be limited to the five examples given in the Notice of Violation, but will encompass all of the requirements of these documents.

Your cooperation with us is appreciated.

Sincerely,

"Original signed by W. D. Shafer"

W. D. Shafer, Chief
Projects Branch 2

cc: W. G. Smith, Jr., Plant Manager

cc w/ltr dtd 09/06/83:
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Ronald Callen, Michigan
Public Service Commission
EIS Coordinator, USEPA
Region 5 Office

RIII

RIII

mt
Holzmer/sv
09/16/83

Boyd

W.D. Shafer
9/17/83

8310120293 830919
PDR ADDCK 05000315
Q PDR

FEOL

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

September 6, 1983
AEP.NRC:0847

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
IE Report Nos. 50-315/83-12 (DPRP)/and 50-316/83-13 (DPRP)

Mr. James G. Keppler
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter is in response to Mr. W. D. Shafer's letter dated August 5, 1983, which forwarded the subject Inspection Report of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2 during the period from June 10 through July 21, 1983. The Notice of Violation attached to Mr. Shafer's letter identified three (3) items of noncompliance. Our response to these items of noncompliance is presented below.

ITEM 1

"Unit 1 Technical Specification 3.5.4.2 states: At least two independent channels of heat tracing shall be OPERABLE for the boron injection tank and for the heat traced portions of the associated flow paths.

Applicability: MODES 1, 2 and 3.

Action:

With only one channel of heat tracing on either the boron injection tank or on the heat traced portion of an associated flow path OPERABLE, operation may continue for up to 30 days provided the tank and flow path temperatures are verified to be $\geq 145^{\circ}$ F at least once per 8 hours; otherwise, be in HOT SHUTDOWN within 12 hours.

Contrary to the above, on June 16, 1983 at about 1500 operators became aware that the B train of heat trace circuit No. 262 (Boron Injection Tank inlet) was an open circuit. This discovery was a result of a job order written on June 12, 1983 when a problem with the circuit maintaining temperature was identified but it was not declared inoperable. The ACTION requirement to verify temperature to be $\geq 145^{\circ}$ F every 8 hours was not carried out and the Unit continued operating in Mode 1.

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

DJK
8309260379

SEP 9 1983

1. Corrective Actions Taken and Results Achieved

Boron Injection Tank and flow path temperature were verified to be $> 145^{\circ}\text{F}$ immediately on discovering the error, and the incident was promptly reported to the NRC. We then initiated eight (8) hour verification of temperature indication. The cause of the loss of the channel of heat tracing (a loose splice on heat tracing wiring) was located and corrected prior to the elapse of the first eight (8) hour period following discovery of error. It should also be noted that the temperature of the Boron Injection Tank and flow path was verified to be greater than 145°F at 24 hour intervals during the period of noncompliance. Therefore, there is no indication that these temperatures were ever below the technical specification limit.

2. Corrective Action to Avoid Further Noncompliance

Our surveillance procedure No. 12-OHP-4030.STP.023 ("Heat Tracing Inspection and Boron Injection Tank Heat Tracing Operability and Operation") has been changed to instruct operators to take readings every eight (8) hours if only one train is operable per the Action Statement of T/S 3.5.4.2.

3. Data When Full Compliance Was Achieved

Full compliance was achieved on June 17, 1983, upon the changing of the surveillance procedure and after immediate verification of satisfactory temperatures.

ITEM 2

"10 CFR 50.54(a)(2) states: Each licensee described in Paragraph (a)(1) of this section shall by June 10, 1983, submit to the appropriate NRC Regional Office shown in Appendix D of Part 20 of this chapter the current description of the quality assurance program it is implementing for inclusion in the Safety Analysis Report, unless there are no changes to the description previously accepted by NRC. This submittal must identify changes made to the quality assurance program description since the description was submitted to NRC. Should a licensee need additional time beyond June 10, 1983 to submit its current quality assurance program description to NRC it shall notify the appropriate NRC Regional Office in writing explain why additional time is needed, and provide a schedule for NRC approval showing when its current quality assurance program description will be submitted.

Contrary to the above, the licensee did not submit a current description of the quality assurance program it is implementing nor was an extension beyond June 10, 1983 requested in writing.

The previous NRC accepted quality assurance program description was reflected by Amendment No. 82, dated November 1978, to the FSAR. Examples exist of changes to the description which warrant a revised description.

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

RESPONSE TO ITEM 2

AEPSC Quality Assurance department had reviewed the changes to 10 CFR 50.54 in February of 1983. At that time, our interpretation was that the current description of our quality assurance program was contained in our July 1982 FSAR Update. Based on this interpretation, we deemed that the submittal called for in 10 CFR 50.54(a)(2) was not required. In June of 1983, in discussion with the NRC Senior Resident Inspector at the Cook Plant, we were informed that our interpretation was incorrect and in fact the quality assurance program description which was accepted by the NRC was contained in Amendment 82 to the Donald C. Cook Nuclear Plant FSAR, dated November 1978.

1. Corrective Actions Taken and Results Achieved

An updated QA program description has been prepared and is currently undergoing review. We expect our review to be completed by September 30, 1983. Upon completion of this review, we will submit the updated QA program description along with the identification of the changes made since our last approved program (i.e., Amendment 82, dated November 1978, to our FSAR).

2. Corrective Action to Avoid Further Noncompliance

We will establish measures to assure that the requirements of 10 CFR 50.54 (a)(3) are implemented. Specifically, we will (1) continue to update the FSAR per 10 CFR 50.71, when changes to our QA program will not reduce the commitments previously accepted by the NRC; and (2) establish measures pursuant to the requirements of 10 CFR 50.54 (a)(3)(i)-(iv), to assure that those changes, which do reduce the commitments previously accepted, will be submitted to the NRC for approval prior to implementation.

3. Date When Full Compliance Will be Achieved

Full compliance is expected to be achieved by January 15, 1984.

ITEM 3

"10 CFR 50, Appendix B, Criterion II states in part..."This (Quality Assurance) program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures or instructions...The program shall take into account the need for special controls, processes, test equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection and test."

Donald C. Cook Units No. 1 and 2 FSAR Section 1.7.19.2 describes the quality assurance program and commits to comply with the requirements of Regulatory Guide 1.58 and ANSI Standard N45.2.6-1973. Commitments and exceptions to the revision of the requirements concerning Qualifications of Inspections, Examination, and Testing Personnel were revised by letter dated September 14, 1981 (AEP:NRC:00567).

Contrary to the above, requirements the licensee committed to in the 1973 and 1978 version of ANSI N45.2.6 were not implemented by written policies, procedures, or instructions. These include:

- a. Certification of personnel qualification
- b. Documented determination of activities individuals are certified to perform
- c. Initial and periodic evaluations of job performance
- d. Specification of required physical characteristics
- e. Maintaining records of the above

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

RESPONSE TO ITEM 3

1. Corrective Actions Taken and Results Achieved

Based on the findings identified above, a review by American Electric Power Service Corporation and I&MECo personnel was performed as per the requirements established by ANSI N45.2.6 and Regulatory Guide (R.G.) 1.58. The objective of this review was to assess the criteria contained within these documents and to recommend methods of implementing these criteria. This review was completed in August, 1983 and the recommendations are being evaluated. Initial results from this evaluation, have indicated that some of our practices and programs should be formalized to be more responsive to the criteria of the documents.

2. Corrective Actions to Avoid Further Noncompliance

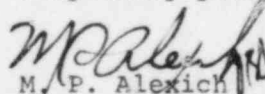
In order to make our program more responsive, several of our Plant Management Instructions will require revision. Our current plans are to have the applicable instructions revised and implemented by the end of February, 1984.

3. Date When Full Compliance Will be Achieved

Full compliance is expected to be achieved by February, 1984.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,


M. P. Alexich
Vice President

MPA/edg

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
E. R. Swanson, NRC Resident Inspector - Bridgman