

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

September 9, 1983

AEP:NRC:0841

Donald C. Cook Nuclear Plant Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC REPORT NO. 50-315/83-11 (DPRP); 50-316/83-12 (DPRP)

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

Dear Mr. Keppler:

This letter responds to Mr. C. E. Norelius' letter dated July 15, 1983, which forwarded the subject Inspection Report of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant during the period of April 1 through June 9, 1983. The Notice of Violation attached to Mr. Norelius' letter identified four (4) items of noncompliance. Mr. Norelius' letter stated no reply to items 1, 2, and 3 was required. With regard to item 4, Mr. Norelius' letter stated our response was to be submitted and was to include those actions which will be taken to avoid future personnel errors in the fire protection area. As discussed on August 18, 1983 with Mr. R. Walker of your staff, an extension to September 9, 1983 was granted to Mr. P. A. Barrett to complete our response to Item 4. Our response is as follows:

ITEM 4

"10 CFR 50 Appendix B, Criterion V establishes requirements for procedural compliance. The Donald C. Cook Nuclear Plant FSAR, Section 1.7, "Operations Quality Assurance Program," commits the licensee to comply with ANS N18.7 (1976). Section 5.2.2 of the standard states in part, "Procedures shall be followed...."

"PMI 7010, "Plant Operations Quality Assurance Program," states in part: "Conditions reports are used to report conditions adverse to quality. A significant part of the corrective actions of these reports is the investigation of the cause of the condition and the measures taken to preclude its repetition." Plant procedure PMI 7030, "Condition Reports," states in part: "investigations shall be complete and accurate addressing such areas as the entire scope of the reported condition and providing both corrective and preventive actions.... Corrective and preventive actions shall include consideration of previous occurrences and commitments...."

SEP 12 1983

Contrary to the above, the licensee's corrective actions failed to prevent repetition of personnel initiated fire protection occurrences. This was indicated by the increase in occurrences in early 1983, and the necessity to reinstitute employee training and give more attention in this area by the licensee.

This is a Severity Level V violation (Supplement 1)."

RESPONSE TO ITEM 4

1. Corrective Action Taken and Results Achieved

In conjunction with the Plant Fire Protection Coordinator, the Training Department has developed a training film which describes the fire protection features at the Donald C. Cook Nuclear Plant, including individual responsibilities. The initial training effort, using this film, was essentially completed in October, 1982, and is now a regular inclusion in the General Employee Training Program. Contractor (craft) personnel receive additional followup training from the I&MECo. Construction Department Safety Coordinator.

Analysis of repetitive problems and problem areas (e. g. personnel errors on Cardox System) resulted in additional restrictions being placed on entry into several CO₂ protected areas and additional assignment of responsibilities to ensure proper actions are taken on entering or leaving a protected area. Through increased awareness, prompt investigation of occurrences and followup with personnel error evaluations, we have reduced the instances of fire protection system occurrences by 30-40%, as compared to the frequency of occurrences for the ten months prior to November, 1982. Additionally, the prompt investigations, normally conducted on the same shift, have resulted in a very high probability of determining the specific individual(s) involved. Determining the individual(s) involved was previously a significant problem in determining the cause and specifically where the corrective action should be directed.

2. Corrective Action To Avoid Further Noncompliance

In addition to the actions taken and underway, as described above, Fire Protection Systems occurrences are trended by both the Corporate and Plant staff. The continued emphasis, being placed on proper treatment of Fire Protection Systems and trending, is expected to further reduce Fire Protection System occurrences.

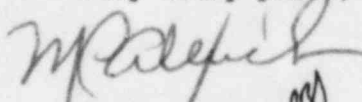
3. Date When Full Compliance Will Be Achieved

With the complexity of the Fire Protection System (i.e., 500 personnel during normal activities and up to 1000 personnel during outages, on site per day and an average of 4000 CO₂ protected area entries/exits per week during non-outage periods), we do not expect to completely avoid personnel error. The actions taken have reduced the error rate from approximately 1.4×10^{-4} errors/transaction on the Cardox System to approximately 0.8×10^{-4} , using the conservative

number of non-outage period transactions. The actions taken have also reduced the time from occurrence to correction (i.e., the period of time fire protection features are degraded). The plant management will continue to monitor performance in this area to ensure the downward trend is continued.

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/cam

cc: John E. Dolan
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