

AUG 31 1984

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:

This is in response to Mr. Smith's letter of July 13, 1984 dealing with concerns relative to procedure adherence raised by a Region III operator licensing examiner during an exit meeting on June 22, 1984.

Mr. Smith responded to our verbal request to review your current operating practices for control of equipment in the manual mode of operation versus the automatic mode of operation delineated in your procedures. We understand that your conclusion, "...have neither defeated nor degraded any safety feature provided by the automatic mode of operating, nor is the severity of an analyzed accident increased, nor is the potential created for causing an unanalyzed accident," is based on a review of your current practices against the safety analysis and the transient analysis for the D. C. Cook facility.

We agree conceptually with the corrective actions in Mr. Smith's letter; however, we do not agree with his characterization that the procedures in place prior to implementation of the corrective actions were not intended to require specific modes of operation for equipment. For example:

Pressurizer Level Control Procedure 1-OHP-4021.003.002 specifically states that, the initial conditions prior to placing the pressurizer level control system in automatic is that the controller shall be in manual. The final condition for operation, as stated in this procedure, is that the pressurizer level is being controlled in automatic maintaining programmed level.

The Abnormal Operating Procedure 2-OHP-4022.003.002 "Malfunction of Pressurizer Level Control System", allows operation of the pressurizer level control system in a manual mode. The discussion portion of this procedure at paragraph 2.3 states that, the operators should have ample time to take corrective action for the malfunctioning pressurizer level control system.

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The Emergency Operating Procedures Index, procedure 2-OHP-4023.001.011, "Reactor Shutdown from the Hot Shutdown Panel Due to Control Room Inaccessibility" at paragraph 5.0 states that, pressurizer level and pressure are verified maintaining their proper operating ranges by the automatic controls before the operators take corrective actions to adjust pressurizer level and pressure.

It is clear from these procedures that operation of the Pressurizer Level Control System in manual is an abnormal activity not permitted by the procedures for routine steady state reactor operations where no controller or system malfunction exists.

The NRC examiner identified several similar examples to the D. C. Cook staff during the review conducted. One of the requirements of an NRC License Examiner during these reviews is to ascertain that licensed personnel understand and are following required procedures. Based on his findings, the examiner was unable to make this determination without the corrective action that is addressed in Mr. Smith's letter.

Additionally, you should be aware that subsequent inspections conducted at the D. C. Cook facility and the results of the Requalification Examination conducted by this office indicate that there may be additional concerns with respect to procedure adequacy, procedure adherence, and licensed staff training. These issues are currently under review by my staff. You will be notified of the results of our review including any items identified which require your attention.

Thank you for your cooperation in this matter.

Sincerely,

Original signed by  
A. Bert Davis

James G. Keppler  
Regional Administrator

cc: W. G. Smith, Jr., Plant Manager  
DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
Ronald Callen, Michigan  
Public Service Commission  
EIS Coordinator, USEPA  
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RIII  
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Reidinger/ld  
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McMillen  
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RIII  
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Walker

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Spessard  
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Davis  
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