

# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

September 28, 1984  
AEP:NRC:0899

Donald C. Cook Nuclear Plant  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
NRC REPORT NOS. 50-315/84-12 (DRP); 50-316/84-14 (DRP)

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

Dear Mr. Keppler:

This letter responds to Mr. W. D. Shafer's letter dated August 29, 1984 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 June 11, 1984 through July 27, 1984. The notice of violation attached to Mr. Shafer's letter identified four items of noncompliance. Our responses are as follows:

## ITEM OF NONCOMPLIANCE - 1

Unit 2 Technical Specification 6.8.1.a requires that written procedures shall be established, implemented and maintained covering the activities recommended in Appendix "A" of Regulatory Guide 1.33, November 1972. This includes procedures for loss of coolant.

Contrary to the above, with the unit in Mode 4 and manual valve RH-104W closed the procedure for initiation of Emergency Core Cooling did not provide the instruction necessary to establish flow to the residual heat removal pump during the recirculation phase of operation.

## RESPONSE TO ITEM OF NONCOMPLIANCE

### 1. Corrective Action Taken

Instructions have been added to procedures 1-OHP 4022.008.002 and 2-OHP 4022.008.002 (Initiation of Recirculation Phase) to direct the operator to open or verify open RH-104 E & W.

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2. Corrective Action to be Taken to Avoid Further Noncompliance

No further actions are necessary.

3. Date When Full Compliance Will be Achieved

Full compliance was achieved on July 2, 1984, when the procedures were changed.

ITEM OF NONCOMPLIANCE - 2

Unit 2 Technical Specification 3.3.2.1 states... "the Engineered Safety Feature Actuation system (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 shall be operable..." Table 3.3-3, line 4c requires that for three loop operation in Modes 1, 2, and 3, the channel(s) associated with the protective functions derived from the out-of-service Reactor Coolant Loop shall be placed in the tripped mode.

Contrary to the above, on July 10, 1984 at 0240 with the plant in Mode 3, the reactor coolant pump for loop 3 was secured without placing the channels associated with the protective functions derived from the out-of-service reactor coolant loop in the tripped mode.

RESPONSE TO ITEM OF NONCOMPLIANCE

1. Corrective Action Taken

The condition went undetected until 0755 hours on July 10, 1984 when it was pointed out to the oncoming Unit Supervisor at which time the protective function inputs were defeated. While reviewing the incident, it was discovered that  $T_{avg}$  had drifted to below  $541^{\circ}\text{F}$  by 0633 due to the pump being off. At this time we were no longer in noncompliance with the Action Statement.

2. Corrective Action to be Taken to Avoid Further Noncompliance

The operators were instructed (via an Operating Memo) to maintain all four Reactor Coolant Pumps (RCP) in service when above  $541^{\circ}\text{F}$ . If a pump must be taken out of service, then the RCS  $T_{avg}$  must be reduced below  $541^{\circ}\text{F}$  within one hour. The memo was issued on July 18, 1984.

The plant's shutdown procedure was revised on September 18, 1984 and the Reactor Coolant Pump operation procedure was revised on September 6, 1984 for both Units to ensure  $T_{avg}$  is reduced to below  $541^{\circ}\text{F}$  within one hour whenever there are less than four RCPs running.

The plant's heatup and startup procedures are being revised to include the above requirements. The expected date for the completion of these revisions is November 1, 1984.

Additionally, training will be done on this specific subject during the licensed operator requalification program. This initial training will be completed by November 1, 1984.

3. Date When Full Compliance Will be Achieved

Full compliance for the specific cited incident was achieved when T drifted below 541<sup>0</sup> F at 0633 hours on July 10, 1984. Other related<sup>avg</sup> corrective actions are expected to be completed by November 1, 1984.

ITEM OF NONCOMPLIANCE - 3

Unit 1 Technical Specification 6.8.1.A requires implementation of procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972. This includes procedure for correcting abnormal, off-normal or alarm conditions.

Contrary to the above, on July 23, 1984, an alarm was received for Loop 1, 2, 3, 4 T<sup>avg</sup> low-low without the licensee implementing all of the action of annunciator<sup>avg</sup> response procedure 1 OHP 4024.111.002.

RESPONSE TO ITEM OF NONCOMPLIANCE

1. Corrective Action Taken

At 1030 hours on July 25, 1984 when the noncompliance was identified, the remaining required procedural actions were taken. As a point of clarification the alarm had come in at 1407 hours on July 24, 1984 instead of July 23, 1984 as identified in the inspection report.

2. Corrective Action to be Taken to Avoid Further Noncompliance

An Operating Memo was issued on August 29, 1984 re-instructing the operators to follow the guidance available in the annunciator response procedures in regards to event-initiated surveillance requirements.

An Operations Department Performance Engineer has been assigned the task of reviewing all of the annunciator response procedures in order to identify event-initiated surveillance requirements. An administrative system is being developed to flag these conditions to the operators and establish controls for logging requirements associated with the surveillances.

3. Date When Full Compliance Will be Achieved

Compliance with the specific citation was achieved on July 25, 1984 when the remaining procedural actions were taken.

The review of the annunciator procedures is scheduled to be completed by December 3, 1984 with the administrative controls in place by December 31, 1984.

ITEM OF NONCOMPLIANCE - 4

Unit 1 Technical Specification 6.8.1.c states written procedures shall be established, implemented and maintained for surveillance and test activities of safety related equipment. The Emergency Core Cooling System Operability Surveillance Test (1 OHP 4030 STP.005) at paragraph 4.1 requires that this test shall be performed on only one Emergency Core Cooling system train at a time.



Contrary to the above, on July 16, 1984 at 0445, while performing 1 OHP 4030 STP.005 to verify operability of the "S" Safety Injection pump check valves, the licensee made two Safety Injection Pumps inoperable.

RESPONSE TO ITEM OF NONCOMPLIANCE

1. Corrective Action Taken

The immediate action taken was to reopen the valve for the pump not under test. The total time both pumps were inoperable was three to five minutes.

2. Corrective Action to be Taken to Avoid Further Noncompliance

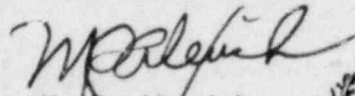
The procedure for performing this test is complicated and involves testing all three ECCS pumps as a train oriented test. Therefore, this test procedure is being divided into six separate procedures, one for each pump per each train. This change should significantly improve the test procedure clarity and the communication problems associated with this event.

3. Date When Full Compliance Will be Achieved

Full compliance for the specific cited incident, was achieved when the valve for the pump, not under test, was reopened. Procedures are scheduled to be completed by March 29, 1985.

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. R. Alexich  
Vice President

WJN  
9-25-84

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Attachment

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