

INDIANA & MICHIGAN ELECTRIC COMPANY

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November 16, 1984
AEP:NRC:0907

Donald C. Cook Nuclear Plant, Unit 2
Docket No. 50-316
License No. DPR-74
NRC REPORT NO. 50-316/84-13 (DRS)

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. W. S. Little's letter dated October 18, 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 May 29-31, August 13-14, and September 28, 1984. The Notice of Violation attached to Mr. Little's letter identified one item of noncompliance:

"10 CFR 50, Appendix B, Criterion V states 'Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.' 10 CFR 50, Appendix J, Paragraph III.A.3.b states, 'Results from the supplemental test are acceptable provided the difference between the supplemental test data and the Type A test data is within 0.25 La. If results are not within 0.25 La, the reason shall be determined, corrective action taken, and a successful supplemental test performed.'

Contrary to the above, section 5.7 in procedure 12-THP-4030-STP-202, Revision 4, allows the licensee, if a supplemental test is not within the acceptance criteria, to move the starting point of the test, without first satisfying the aforementioned Appendix J requirements. This resulted in the licensee arbitrarily dropping the first seven sets of data (3.5 hours) in the June 16, 1984 supplemental test without adequately determining the reason. The use of all the data would have resulted in a failed test."

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Our response to Mr. Little's letter is as follows:

1. Corrective Action Taken

An extensive evaluation of the supplemental test and the plant procedure was performed after the test was completed. The evaluation revealed that an incorrect conversion factor had been used to calculate the supplemental leak. A calculation with the corrected imposed leak rate was then performed. The new calculation, which included all of the data sets (including the discarded sets discussed below), revealed that the supplement test results were acceptable (i.e., within 0.25 La).

2. Corrective Action to be Taken to Avoid Further Noncompliance

10 CFR 50, Appendix J states, in part, "If results [of the supplemental test] are not within 0.25 La (or 0.25 Lt), the reason shall be determined, corrective action taken, and a successful supplemental test performed."

The response to Question 022.6(6) of the D. C. Cook FSAR, Appendix Q states, "The supplemental test shall be conducted for a minimum duration of six hours."

Approximately 14 hours into the supplemental test for the 1984 containment integrated leak rate test, the supplemental test data was evaluated. Based on the evaluation at that time, the test data did not reflect a linear regression during the first few hours of the supplemental test. Thus, cognizant individuals determined, at that time, that the reason for the nonlinear regression was probably some instability in the containment during the first few hours.

Knowing that the acceptance criteria were (1) results within 0.25 La and (2) a minimum test duration of six hours; no corrective action had to be taken to attain a successful test. The last eleven hours (well in excess of the required six hours) of the supplement test revealed that the 0.25 La criterion had been met. Thus, as required by 10 CFR 50, Appendix J, (1) the reason for the test results apparently not being within 0.25 La had been determined; (2) no physical corrective actions were necessary; and (3) a successful supplemental test of adequate duration had been performed. Therefore, the above 10 CFR 50, Appendix J requirements and FSAR requirements were met.

We believe that neither 10 CFR 50, Appendix J nor ANSI N45.4-1972 prohibit the discarding of initial supplemental test data. As indicated in 10 CFR 50, Appendix J, the concern of a supplemental test is a test of "sufficient duration to establish accurately the change in leakage rate..." Our test actions met this concern.

The statement in the NRC inspection report that the licensee arbitrarily dropped sets of data is not correct. As indicated above, cognizant individuals evaluated the issue and decided to discard the first sets of data, based on the test requirements. Thus, the discarded data was

initially dropped as a result of a real time evaluation. It was not discarded arbitrarily or as a result of an after the fact detailed analysis.

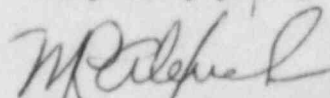
The Notice of Violation indicates that the plant procedure was inadequate, in that, the procedure does not state that "If results are not within 0.25 La, the reason shall be determined, corrective action taken, and a successful supplemental test performed." Though, we did not violate this Appendix J requirement, we will revise the plant procedure to include this requirement.

3. Date When Full Compliance Will be Achieved

Full compliance with 10 CFR 50, Appendix B, Criterion V will be achieved by revising the plant procedure before the next time it is used.

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

RRK
11/16/84

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Attachment

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