U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-315/87003(DRP); 50-316/87003(DRP)

Docket Nos. 50-315; 50-316 Licenses No. DPR-58; No. DPR-74

Licensee: American Electric Power Service Corporation
Indiana and Michigan Electric Company
1 Riverside Plaza
Columbus, OH 43216

Facility Name: Donald C. Cook Nuclear Power Plant, Units 1 and 2

Inspection At: Donald C. Cook Site, Bridgman, Michigan

Inspection Conducted: December 16, 1986 through January 26, 1987

Inspectors: B. L. Jorgensen

J. K. Heller

Approved By: B. L. Burgess, Chief
Projects Section 2A

2/18/87
Date

Inspection Summary

Inspection on December 16, 1986 through January 26, 1987 (Reports No. 50-315/87003(DRP; No. 50-316/87003(DRP))
Areas Inspected: Routine unannounced inspection by the resident inspectors of previously identified items; operational safety; maintenance; surveillance; reportable events; Generic Letters; I. E. Bulletins; and NRC Region III requests. An Enforcement Conference held in the NRC Region III offices on January 21, 1987 is also addressed.
Results: Of the nine areas inspected, no violations or deviations were identified in seven areas. Two violations were identified (untimely return-to-service testing - Paragraph 4; inappropriate surveillance test acceptance criteria - Paragraph 5) with one in each of the remaining two areas.

DETAILS

1. Persons Contacted

a. Inspection - December 16, 1986 through January 26, 1987

*W. Smith, Jr., Plant Manager
*A. Blind, Assistant Plant Manager - Administration
J. Rutkowski, Assistant Plant Manager - Production
L. Gibson, Assistant Plant Manager - Technical Support
B. Svensson, Licensing Activity Coordinator
T. Kriesel, Technical Superintendent - Physical Sciences
*K. Baker, Operations Superintendent
*E. Morse, Quality Control Superintendent
T. Beilman, I&C/Planning Superintendent
*J. Allard, Maintenance Superintendent
T. Postlewait, Technical Superintendent - Engineering
M. Horvath, Quality Assurance Supervisor
R. Clendenning, Radiation Protection Supervisor

The inspector also contacted a number of other licensee and contract employees and informally interviewed operations, maintenance, and technical personnel.

*Denotes some of the personnel attending Management Interview on January 28, 1987.

b. Enforcement Conference - January 21, 1987

i) License and Consultants

J. Dolan, Vice Chairman, AEP
M. Alexich, Vice President - Nuclear, AEP
J. Feinstein, Manager, Nuclear Safety and Licensing, AEPSC
W. Zimmerman, Senior Engineer, AEPSC
M. Marrocco, Manager, HE&P Section, AEPSC
M. Ackerman, NS&L Engineer, AEPSC
W. Tauche, Senior Engineer - Nuclear Safety, Westinghouse
W. Smith, Jr., Plant Manager
C. Mast, Engineer - Nuclear Safety, Westinghouse
J. Ruthkowski, Assistant Plant Manager-Production
B. Svensson, Licensing Activities Coordinator
K. Baker, Operations Superintendent
J. Allard, Maintenance Superintendent
W. Nichols, Training Manager
F. Pisarsky, Production Supervisor
Q. Arent, Administrative Compliance Coordinator

ii) Nuclear Regulatory Commission

A. B. Davis, Deputy Regional Administrator
C. E. Norelius, Director, Division of Reactor Projects
B. Berson, Regional Counsel
J. Grobe, Director of Enforcement
D. Wigginton, Senior Project Manager, Licensing, NRR
B. Burgess, Chief, Projects Section 2A
B. Jorgensen, Senior Resident Inspector
R. Kazmar, Project Inspector

2. Actions on Previously Identified Items

a. (Closed) Unresolved Item (315/86041-01): Potential violation of requirements for proper control of maintenance and operating status. The subject conditions have been determined to be a Violation. This is addressed in Paragraph 4.c (Maintenance), of this report.

b. (Closed) Confirmation of Action Letter Items

i) 316/85035-02: Determine why the "A" reactor trip breaker in Unit 2 failed to trip on receipt of a valid trip signal on October 29, 1985. The failure was established and reported (I. E. Inspection Report No. 50-316/85035) as due to inadequate tripping force from the undervoltage tripping attachment (UVTA). Subsequently, the UVTA was tested by the vendor (Westinghouse) with participation by the licensee and the NRC. The root cause was determined to be a manufacturing defect, apparently isolated, involving a small bit of weld spatter which caused internal interference/binding.

ii) 316/85035-07: Report within 30 days concerning findings and conclusions of the investigation of the trip breaker failure. The licensee's letter (AEP:NRC:0962B) dated November 17, 1985 completed this action.

iii) 316/85035-08: Obtain authorization from the NRC Region III Regional Administrator (or his designee) prior to restart of either Unit. The licensee requested and was authorized restart in accordance with this provision, as described in NRC's letter to the licensee dated November 8, 1985.

No violations, deviations, unresolved or open items were identified.

3. Operational Safety Verification

During the inspection period, the inspector observed control room operation, manning, shift turnover, approved procedures and Limiting Condition for Operation (LCO) adherence, and also reviewed applicable logs and conducted discussions with control room operators. Observations

of the control room monitors, indicators, and recorders were made to verify the operability of emergency systems, radiation monitoring systems, and nuclear and reactor protection systems, as applicable. Reviews of surveillance, equipment condition, and tagout logs were conducted. Proper return to service of selected components was verified. Tours of the auxiliary building, turbine building, and screenhouse were made to observe accessible equipment conditions, including fluid leaks, potential fire hazards, and control of activities in progress. During discussions with operations personnel, and while observing operations personnel in conduct of activities, the inspector evaluated their knowledge and capabilities as a reflection of their training.

a. The licensee reported via ENS late on January 14, 1987 (HQ:DO Event Log No. 7481) concerning planned maintenance to repair a small water leak. The repair necessitated isolating part of a Unit 2 turbine building fire suppression water header. Subsequently, more detailed evaluation of the nature and extent of the isolation required for this repair established that the referenced Technical Specification fire hose standpipes were not affected. Thus, it was concluded the ENS notification was not necessary and no further followup (i.e. written notification) was required. The licensee documented this conclusion in a letter dated January 16, 1987.

b. Inspector tours in the auxiliary building frequently included independent detailed radiological surveys. During a survey of the Unit 1 West RHR pump room on December 22, 1986, the inspector noted a "hot spot" (reading nearly 1,000 mR/hr at contact) which had not been identified, tagged or mapped by routine licensee surveys. This "hot spot" was very localized (readings dropped to below 40 mR/hr within 18 inches) atop valve 1-IMO-320 at the joint of a capped vent tap and the valve body. The existence of this spot was conveyed by the inspector to licensee radiation protection personnel, who verified, tagged and mapped it per procedure. Subsequent tours verified licensee surveys had addressed the condition properly.

c. The inspector walked down the Unit 2 component cooling water East loop using Sheet No. 1, "Unit 2 East Component Cooling Water Loop Flow Path", of licensee procedure **2-OHP 4030 STP.020E "East Component Cooling Water Operability Test" (see also Paragraph 5, Surveillance). No significant problems or operability questions were identified, nor were any conditions noted which indicated any components were materially degraded. Some items were noted which were referred to appropriate licensee representatives for followup as follows:

   i) A small piece of duct tape was in place across the end of a closed vent/sample tap, designated CPX-415; the tape was subsequently removed. Further review established this tap did not require a cap.

ii) On the lineup sheet, valve 2-CCW-183E was incorrectly identified as "RHR heat exchanger inlet" - the valve tag, other lineup procedures and the applicable drawing all confirm this valve as the RHR HX "outlet"; the error was corrected.

iii) One valve checked on page 1 (2-CCW-174E) is physically adjacent to two other valves (2-CMO-411 and 2-CMO-415) not checked until page 3 - an inefficient organization of checks since page 2 is performed in other parts of the plant; the licensee is evaluating an appropriate re-organization.

iv) Several valves, typically heat exchanger outlets, are described as throttled to some specified flow, but flow is not verified (is not even verifiable in some cases) under the subject lineup procedures, and the valves are not secured in position; the licensee satisfied the inspector by showing that other procedures are routinely performed which validate valve positions by use of installed flow gauges.

v) A large scaffold was constructed over both suction cross-tie valves; evaluation showed damage/failure involving either or both of these valves would not compromise system operability.

d. The inspector reviewed Operations Department procedures as follows:

i) OHP 4021.016.003 "Operation of the CCW System During Reactor Startup and Normal Operation".

ii) OHP 4021.016.002 "Interchange of the spare CCW Pump with the East or West CCW Pump".

iii) 1-OHP 4024.104 and 2-OHP 4024.204 "Annunciator No. 4 Response - Essential Service and Component Cooling".

A discontinuity was noted between i) and iii) above in that the operation procedure contains a precaution to avoid system operation below 70 degrees F, whereas the alarm response procedures (both Units) had to be revised to a low temperature alarm point of 60 F (instead of 70 F), reportedly because the alarm was frequently present at below 70 F. The licensee agreed to review this matter to determine whether 70 F is appropriately the normal operating limit and thereby reconcile the procedures. Until such reconciliation is reached, this is considered an Open Item (Open Item 315/87003-01; 316/87003-01).

The operations procedure for interchanging the spare CCW pump with the East or West pump (item ii) above) was nonspecific with respect to verification of the "operability" of the installed spare. That is, no specific referral is made to a quantitative performance test utilizing an approved surveillance test procedure. Instead, a procedural statement requires the operators to run the "spare" pump at least an hour and verify

"proper pump and motor operation and flow". Imprecise surveillance control concerning utilization of the spare pump is discussed further below at Paragraph 5, Surveillance.

One open item and no deviations, unresolved or open items were identified.

4. Maintenance

Station maintenance activities of safety related systems and components listed below were reviewed to ascertain that they were conducted in accordance with approved procedures, regulatory guides and industry codes or standards and in conformance with Technical Specifications. The following items were considered during this review: the Limiting Conditions for Operation were met while components or systems were removed from service; approvals were obtained prior to initiating the work; activities were accomplished using approved procedures; and post maintenance testing was performed as applicable. During observation of activities in progress, the inspector evaluated employe training in the maintenance area as reflected by performance knowledge and capabilities.

The following maintenance activities were reviewed or observed.

a. Observed

i) Implement RFC-2761 (install bearing temperature monitoring system) for emergency diesel generators 1AB and 1CD.

ii) Job Order 725253: Rebuild/Testing of Snubber GTS.

This snubber failed the visual inspection performed in January 1987 because the oil reservoir appeared empty. The snubber passed a subsequent bench functional test. The inspector verified that the licensee considered the snubber a failure for the purpose of scheduling the next snubber visual inspection frequency.

iii) Job Order 015513: U. T. inspection of a piping joint upstream of 2-FMO-251 (ISO 2-FW-625 HT 3 of 3).

The licensee has a formal program in place to detect erosion/corrosion of secondary side (primarily steam) piping. As a result of the problems with the feedwater lines at the Surry Nuclear Power Station, the licensee has expanded this program to include selected components of the feedwater piping. As of January 26, 1986, the expanded program, which includes 48 components for Unit 2 and 44 components for Unit 1, is 100 percent complete for Unit 2 and 39 percent complete for Unit 1. The licensee has determined all pipe wall thickness measurements made to

date are within acceptable limits. The licensee has a mid-February 1987 completion date for the remaining Unit 1 components.

b. Reviewed

i) Procedure PMI-2290, "Job Orders".

ii) Job Order 032778 (File ME-PP-PP10): Replaced outboard bearing on 2W component cooling water pump - performed concurrently with Job Order 038576 (see below).

iii) Job Order 034377 (File ME-PP-PP10): Lubricated 2E and 2W component cooling water pumps - June 3 and 4, 1985.

iv) Job Order 12224: Repair East ESW pump (Unit 2).

v) Job Order 035376 (File ME-PP-PP10): Drilled, tapped and plugged 1/4-inch hole in 2W component cooling water pump casing for NPT per design change - February 23, 1985.

vi) Job Order 038576 (File ME-PP-PP10): Replaced 2W component cooling water pump inboard and outboard mechanical seals and, (via three Job Order Supplements) substituted "spare" CCW pump for pump 2W while the later underwent repair, then restored pump 2W.

vii) Procedure **12 MHP 5021.016.002 "Maintenance Procedure for Preparing the Spare CCW Pump for Service".

viii) Procedure **12 MHP 5021.016.003 "Maintenance Procedure for Changing from the Spare CCW Pump to the Original Pump".

The primary focus of the above reviews was on licensee controls associated with utilization of an installed "spare" component cooling water pump. This last occurred during the period from November 1984 through April, 1985. As noted in Paragraph 3 above, the inspector found the Operations Head Procedures (OHPs) to lack specificity concerning precise means to determine the "spare" pump is OPERABLE (Technical Specification definition) for service. The Maintenance Head Procedures (MHPs) noted above similarly lacked specificity, in that the surveillance test procedure to be used is not identified. On the other hand, the MHP procedure does contain an instruction (Step 7.4.19) to notify the Operations Shift Supervisor that the "pump operability test" be performed. In the specific case reviewed here, the approved Technical Specification surveillance test procedure in existence at the time was used. This nevertheless had some inherent problems, as discussed further in Paragraph 5 below.

The inspector also noted a handwritten correction on the file copy of the data sheets (Attachment 1) associated with **12 MHP 5021.016.003 noted above. The Attachment reversed the identity of signoff steps for CCW pumps 2E (East) and 2W (West), a mistake corrected in the field in April 1985 during the last performance of the procedure. No evidence existed to indicate that the administrative requirements for review and approval of procedure changes were complied with. Since 1985, this type of improperly reviewed/approved procedure change (handwritten revision) has been the subject of a violation concerning different examples (reference Inspection Reports 50-315/86004(DRP); 50-316/86004(DRP)). Based on the corrective action for the previous violation, a violation for the 1985 example will not be issued and the inspectors have no further questions regarding this issue.

The inspector reviewed the current revision of the subject procedure (**12 MHP 5021.016.003) which still contained the discrepancy involving reversal of the identity of signoff steps noted above. This was discussed with maintenance procedure personnel who stated that the procedure had not been used since April 1985, and that the discrepancy has been corrected in a substantive re-organization of the procedure into four separate procedures, which are currently in the formal review and approval process.

c. Previous Item

This inspection included further evaluation (reference Paragraph 2, above) concerning circumstances described in Inspection Reports 50-315/86041(DRP); 50-316/86041(DRP) which involved performance of maintenance in both trains of the Unit 1 containment spray system. A flow path valve in the East train (valve 1-IMO-215) was worked on first, but it was not subsequently tested to verify it remained capable of proper performance until after valves in the west train were then worked on, tested, and determined operable.

The ASME Boiler and Pressure Vessel Code, Section XI (at IWV-3400) and the licensee's procedure PMI-5070 "Inservice Inspection" (at Page 4 of 8), both require that prior to the time of return to service for a valve which has undergone maintenance that could affect performance, the valve shall be tested as necessary to demonstrate performance is within acceptable limits. Adjustment of stem packing is specifically identified as an example of maintenance that could affect performance. The procedure PMI-5070 further specifies use of Attachment No. 2, "Valve Stroke Time Test Data Form" which in turn provides instructions that testing is "...to be performed immediately or as soon as conditions permit following work on or replacement...which could affect stroke time of valves."

Unit 1 Technical Specification 6.8.1 requires written procedures be implemented covering applicable procedures of Appendix "A" to Regulatory Guide 1.33 dated November, 1972. This includes, at Section I.1, procedures for maintenance which can affect the performance of safety-related equipment. The licensee's failure to implement requirements of PMI-5070, Attachment 2 and perform an immediate performance test on valve I-IMO-215 after maintenance on December 6, 1986 is considered a violation of Technical Specification 6.8.1 (Violation 315/87003-02).

One violation and no deviations, unresolved or open items were identified.

5. Surveillance

The inspector reviewed Technical Specifications required surveillance testing as described below and verified that testing was performed in accordance with adequate procedures, that test instrumentation was calibrated, that Limiting Conditions for Operation were met, that removal and restoration of the affected components were properly accomplished, that test results conformed with Technical Specifications and procedure requirements and were reviewed by personnel other than the individual directing the test, and that deficiencies identified during the testing were properly reviewed and resolved by appropriate management personnel. During observation of activities in progress, the inspector evaluated employee training in the surveillance area as reflected by performance knowledge and capabilities.

The following were observed or reviewed:

a. **1 THP 6030 IMP.131 "Power Range Nuclear Instrument Calibration; N41, 42, 43, 44" - observed in part for N43 only on December 18, 1986.

b. **1 OHP 4030 STP.007E "East Containment Spray System Surveillance Test" - observed January 14, 1987 for routine periodic testing of the 1E pump concurrent with collection of extensive vibration data for analysis by a consultant. The vibration criteria in existence at the time were exceeded and the pump declared inoperable for several hours until engineering evaluations established new baselines and acceptance criteria.

c. 12 THP 4030 STP.224 "Functional Test of the Cable Vault Halon System." The inspector observed the Unit 2 test on January 23, 1987. When the test failed to meet the acceptance criteria, the performance engineer notified plant management that the system was inoperable and appropriately initiated a job order and condition report.

d. 1 OHP 4030 STP.050W "Monthly Surveillance Test of West Residual Heat Removal System."

e. 1 THP 4030 STP.204 "Functional Test of the 650 ft. Containment Air Lock."

f. **1 THP 4030 STP.064 (and .065) "East (West) Component Cooling Loop Process Monitor R17A (R17B) Surveillance Test."

g. 12 MHP 4030 STP.004 "Visual Inspection of Inaccessible Snubbers."

The licensee identified to NRC Region III that non-certified visual examiners had performed ASME Section XI examination of inaccessible snubbers on July 25, 1986. ASME Section XI (1983 edition) requires that personnel performing visual examination of snubbers be qualified per ANSI N45.2.6. This requirement became effective when the licensee upgraded to the 1983 edition of Section XI on July 1, 1986. The licensee documented the discrepancy on Condition Report 12-11-86-1329 and Problem Report 86-125. The licensee reviewed the qualifications of the mechanics performing the visual inspections and determined that they met the requirements of ANSI N45.2.6. based on their education, training, and years of experience. Because of this, the licensee will consider the July 25, 1986 inspection acceptable. All future inspections will be performed with personnel who are formally (i.e. prior documentation) qualified/certified to ANSI N45.2.6.

The inspector reviewed Condition Report 12-11-86-1329 and, after consultation with Region III personnel, concluded that the licensee's approach was acceptable. As provided in the NRC enforcement policy, this matter will not be the subject of a Notice of Violation because the licensee identified, reported and corrected the problem, if fit a Severity Level V Category, and it was not a violation that could reasonably been expected to have been prevented by the licensee's corrective action for a previous violation.

h. 12 MHP 4030 STP.004 "Visual Inspection of Accessible Snubbers."

The inspector verified that the personnel performing the Unit 1 inspection during January 1987 were formally qualified/certified to ANSI N 45.2.6.

i. **12 THP 4030 STP.205A "ECCS Pump and Valve Time Response Test - Train A.

The inspector noted that controlled copies of procedures **2 THP 4030 STP.205A and .205B Revision 3 dated 1981 were still on file in the QC Department reference library. These procedures have apparently been supplanted by procedures **12 THP 4030 STP.205A and 205B (prefix "12" indicating applicability to both Unit 1 and 2) dated 1986, which were used during the Unit 2, 1986 outage testing program. The licensee reviewed this matter and determined the outdated procedure was cancelled effective March 1984. The QC Department reference library was corrected. This library is not a source for procedures required to be "in-hand" in the field.

j. **2 OHP 4030 STP.020E (and .020W) "East (West) Component Cooling Loop Surveillance Test" (Unit 2).

k. **1 OHP 4030 STP.020E (and .020W) "East (West) Component Cooling Loop Surveillance Test (Unit 1)."

Procedures STP.020E and STP.020W for both Units were reviewed in followup of questions based upon review by the inspector of use of the installed "spare" CCW pump as a replacement for the inservice CCW pumps. The first question involved the quantitativeness of the acceptability of the "spare" pump due to the lack of a specific reference to a test procedure in operations and maintenance procedures, which could establish quantitative acceptability of the "spare". The inspector determined the licensee utilized a portion of an approved surveillance test procedure when replacing pump "2W" with the "spare" in November 1984. The acceptance criteria used in the surveillance procedure were those which had been established for pump "2W", not for the "spare" pump. At that time the acceptance criteria had not been specifically established for the "spare" pump and it had failed the "2W" criteria because it developed too large of a pressure differential. Engineering evaluations discovered the acceptability of these results prior to reliance on the pump to meet pump "2W" requirements. In fact, subsequent engineering evaluation concluded that the "spare" met ASME Section XI requirements when compared either to its own baseline or that of pump "2W". Subsequently, revisions to the applicable procedure have moved the acceptance criteria from the body of the procedure to a referenced Technical Data Book. The Technical Data Book, a controlled document, contains quantitative data for all five CCW pumps, thereby resolving the concern that the "spare" may become substantially degraded when compared to the lesser acceptance criteria for another pump.

The inspector specifically examined CCW pump tests for both Units (STP.020E and STP.020W above) to verify that a unique Technical Specification applicable to Unit 1 was properly addressed. Technical Specification 4.7.3.1.c for Unit 1 requires the component cooling water pumps' performance be compared to their respective manufacturer's pump performance curve and that discharge pressure is verified to be at least 93 percent of the applicable flow curve. The licensee implemented this requirement by specifying flow at 7,000 gpm and then verifying discharge pressure at least 102 psig. This approach does not account for: (1) differences among pump performance curves, and (2) for potential variation of the pump suction pressure (caused by variable surge tank level, for example) which will in turn affect discharge pressure. Calculations by the inspector and licensee personnel disclosed the acceptance criteria of 102 psig is not correct for the Unit 1 pumps (1E, 1W or "spare") and can be nonconservative for any of them. The pump-specific discharge pressures determined to represent 93 percent of the respective pump performance curve for 7,000 gpm flow were compared to historic data obtained in performance of the subject testing. No instances were found where a pump failed the criteria which should

have been applied. In one case, a pump was at the minimum value which should have applied, but this was about 2 psig above the 102 psig which was being used and, apparently, no investigation or other action ensued. Appendix B, to 10 CFR 50, at Criterion V, requires procedures to include appropriate acceptance criteria for determining important activities have been satisfactorily accomplished. Failure to provide acceptance criteria appropriate to determine compliance with Technical Specification performance requirements for the Unit 1 component cooling water pumps, as described above, is considered a violation of Criterion V, of Appendix B (Violation 315/87003-03).

One violation and no deviations, unresolved or open items were identified.

6. Reportable Events

The inspector reviewed the following Licensee Event Reports (LERs) by means of direct observation, discussions with licensee personnel, and review of records. The review addressed compliance to reporting requirements and, as applicable, accomplishment of immediate corrective action and appropriate action to prevent recurrence had been accomplished in accordance with applicable requirements.

a. (Closed) LER 50-315/85029, Revision 0: Inoperable Fire Doors.

The licensee identified several fire doors which did not close properly during the semi-annual surveillance test. The LER was written and committed to a supplemental report that would include a safety evaluation of the event. The safety evaluation (transmitted by licensee letter dated January 15, 1987) concluded that the event was not reportable and retracted the LER. The inspector has reviewed the LER and the letter advising of the retraction and concurs with the retraction.

b. (Closed) LER 50-316/86025, Revision 0: Seismic Qualification of Battery Charger Timer Switches.

The licensee had replaced some original-equipment timing devices associated with the Class 1E 250 volt DC battery chargers. The original timers, manufactured by Cramer, were known to have been seismically qualified for use with these battery chargers, whereas the replacements, manufactured by Bristol Saybrook Co., could not be substantiated after installation to be likewise qualified. The licensee's letter of December 16, 1986 reported the replacement timers had been tested with the battery chargers and were seismically qualified. The LER thus proved unnecessary and has been withdrawn. The inspector verified the licensee is pursuing why seismic qualification information was not verified prior to installation of the new timers (which, though a concern, is not germane to reportability in this case) and, on that basis, concurs with the retraction.

No violations, deviations, unresolved or open items were identified.

7. Generic Letters

The inspector reviewed the Generic Letters listed below and verified that: the licensee has received the Letter; the Letter was reviewed by appropriate management representatives; a written response was submitted if required; and, plant-specific actions were taken as described in the licensee's response.

a. (Closed) Generic Letter 85-07, "Implementation of Integrated Schedules for Plant Modifications" (Licensee file number - AEP:NRC:0938).

The licensee's response dated June 28, 1985 provided the requested information and stated that the licensee does not plan to participate in a formal integrated living schedule but will continue to support an informal integrated living schedule.

b. (Closed) Generic Letter 85-14, "Commercial Storage at Power Reactor Site of Low-Level Radioactive Waste Not Generated by the Utility" (Licensee file number - AEP:NRC:09366).

This Generic Letter required no response. The file contains an evaluation stating that the licensee does not plan any low-level radioactive waste storage at the plant site.

c. (Closed) Generic Letter 85-22, "Potential for Loss of Post-Local Recirculation Capability Due to Debris Package".

This Letter did not require a response.

d. (Closed) Generic Letter 85-06, "Quality Assurance Guidance For ATWS Equipment That Is Not Safety-Related" (Licensee file number - AEP:NRC:09272).

The Generic Letter did not require a written response but did provide additional guidance for meeting the requirements of 10 CFR 50.62, "Requirements for Reduction of Risk from Anticipated Transient Without Scram Events For Light-Water Cooled Nuclear Power Plants". The licensee has provided correspondence for 10 CFR 50.62.

No violations, deviations, unresolved or open items were identified.

8. IE Bulletins

IE Bulletin 85-02 "Undervoltage Trip Attachments of Westinghouse DB-50 Type Reactor Trip Breakers", was written to address reactor trip breaker reliability, testing and operability issues. One driving force for issuance of this Bulletin was the failure of the D. C. Cook, Unit 2 Train "A" trip breaker to open on receipt of a valid trip signal on October 29, 1985. This failure-to-trip event precipitated an immediate

special inspection (reference IE Inspection Reports No. 50-315/85035; 50-316/85035) by an NRC Augmented Incident Response Team, and a Confirmatory Action Letter involving review and evaluation of the event was issued October 30, 1985. Actions by the licensee to close remaining Confirmatory Action Letter line items are addressed in Paragraph 2 above.

IE Bulletin 85-02 applied only to plants equipped with DB-50 trip breakers which did not have an "automatic shunt trip" capability installed. At the time the Bulletin was issued, this applied to D. C. Cook, Unit 2 only. By the time of the required response to the subject Bulletin, however, as documented in the licensee's letter (AEP:NRC:0962A) dated December 6, 1985 the "automatic shunt trip" had been installed, tested and determined operable. This matter is, therefore, considered closed. This also closes TI 2515/72.

No violations, deviations, unresolved or open items were identified.

9. NRC Region III Requests

a. By Memorandum dated January 16, 1987, NRC Region III requested that the resident inspectors review the licensee actions taken to implement Unresolved Safety Issue A-26, "Reactor Vessel Pressure Transient Protection For Pressurized Water Reactors". The Licensee's actions have previously been the subject of a special inspection, as documented in Inspection Reports 50-315/86034; 50-316/86034 which closes TI 2500/19.

b. By Memorandum dated January 21, 1987, NRC Region III requested review of licensee actions with regard to I. E. Information Notice 85-45, "Potential Seismic Interaction Involving The Moveable In-Core Flux Mapping System Used in Westinghouse Designed Plants". The inspector examined the licensee's files on this matter (File AEP:NRC:09292) and determined the Information Notice had been received and properly distributed for evaluation and action. In-place inspections performed by the licensee found Unit 2 lacked some restraints provided for in original design drawings and present in Unit 1. The plant was restored to the original design configuration. Other supports were modified in both Units. Specific seismic evaluations of the "as-found" conditions showed both Units were not susceptible to the potential adverse seismic interaction postulated by the Information Notice. Based on the licensee's action, TI 2500/16 is considered closed.

No violations, deviations, unresolved or open items were identified.

10. Enforcement Conference

An enforcement conference, attended as indicated in Paragraph 1.b above, was held in the NRC Region III offices on January 21, 1987. The purpose of the conference was to discuss a finding documented in I. E. Inspection Reports 50-315/86042(DRP); 50-316/86042(DRP) and in Licensee Event Report

No. LER 316/86026, concerning operation of Unit 2 in MODE 1 for about hours hours on September 4 and 5, 1986 while one safety injection train had no flow path and the other train flow path was restricted to two (instead of four) cold legs.

The licensee made presentations in two major areas. The first area addressed was how and why the subject configuration occurred. This included discussion of the operations, maintenance, and surveillance testing history of the subject system, as well as a description of the administrative control processes involved in system removal from and return to service.

The second presentation focused on evaluation of potential safety consequences relating to postulated accidents with the system in the subject configuration. NRC staff questions were addressed in each major area.

At the conclusion of the conference, the licensee was advised that the information provided would be taken into consideration in determining any appropriate further action.

One violation, which is being evaluated for escalated enforcement action was identified. No deviations, unresolved or open items were identified.

11. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. An open item disclosed during the inspection is discussed in Paragraph 3.d.

12. Management Interview

The inspectors met with licensee representatives (denoted in Paragraph 1.a) on January 28, 1987 to discuss the scope and findings of the inspection report. In addition, the inspector asked those in attendance whether they considered any of the items discussed to contain information exempt from disclosure. No items were identified.