

INDIANA & MICHIGAN POWER COMPANY

P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

July 27, 1979
AEP:NRC:00239

Donald C. Cook Nuclear Plant Units No. 1 & 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74

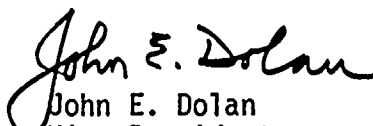
Mr. James G. Keppler, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter is in response to Mr. G. Fiorelli's letter of July 3, 1979 received July 9, 1979 and which transmitted IE Report No. 50-315/79-10 and 50-316/79-07.

The attachment to this letter contains the information requested by Mr. Fiorelli's letter regarding the infraction which appeared to be in non-compliance with NRC requirements.

Very truly yours,


John E. Dolan
Vice President

JED:clb
attachment

cc: R. C. Callen
G. Charnoff
R. S. Hunter
R. W. Jurgensen
D. V. Shaller - Bridgman

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Response to Notice of Violation described in
IE Inspection Report 50-315/79-10; 50-316/79-07

"On May 21, 1979, the inspector observed that the repair of the feedwater nozzle/piping had been started without an established repair procedure. A procedure for the repair activities was developed and issued on May 28, 1979." The inspector states that excavation of defective areas on the feedwater piping had been observed in process on May 21, 1979, without the use of a procedure to adequately control the repair activities.

Plant Management does not concur with this finding.

Prior to the inspector arriving on site on May 21, 1979, the following actions had been taken:

- a) On May 19, 1979, the Plant Maintenance Department requested that the plant QC Department perform a nondestructive examination of the cracked area of the nozzle to feedwater elbow weld on the Unit 2 Steam Generators #1 and #4 to determine the extent of the crack, and to see if any other surface indications existed in other areas near these two welds. Magnetic particle examination was used in this initial examination. The same welds on Steam Generators #2 and #3 were also examined using magnetic particle examinations. Except for the leaking area, the magnetic particle examination did not reveal any other surface flaw indications.
- b) Subsequent to this examination, the Plant Maintenance Department, utilizing Maintenance Procedure No. 12 MHP 5050.SPC.002 Revision 1, dated January 4, 1979, entitled "Piping System Defect Identification and Removal", commenced grinding. The use of this procedure is normal practice when piping system defects are evident but the scope of the problem is unknown. Basically, it addresses excavation and non-destructive examination methods and requirements for determining the magnitude of a defect. This procedure was utilized in an attempt to define the magnitude of the defect. However, it became very apparent that the scope of this defect was not going to be defined using this method.

On May 20, 1979, Superior Industrial X-Ray was brought on site to perform a radiographic examination of all the Unit 2 nozzle welds. This examination revealed indications of flaws in all four nozzles. Additional examinations requested by the American Electric Power Service Corporation were performed which included removing samples from selected elbows. These samples were sent to an independent laboratory for failure analysis and the performance of a stress examination using a hydroset machine.

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It was only after all of these exploratory tests and examinations that a repair program was to be formulated. On May 26, 1979, the Plant QA Supervisor issued a stop work order until a comprehensive repair program procedure was developed. This procedure, 12 MHP-SP-001, was approved and issued on May 28, 1979. From that date until completion of the repair this special procedure was followed.

It is our contention that this notice of violation is unwarranted and that the grinding observed by the inspector did not constitute a repair. Rather, the grinding was part of defining the extent of damage which had occurred. Hence, the infraction involving an apparent non-compliance with NRC requirements regarding the necessity of utilizing established procedures did not occur.