

# INDIANA & MICHIGAN ELECTRIC COMPANY

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

October 1, 1981  
AEP:NRC:0615


Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
NRC Inspection Report 50-315/81-15

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

Dear Mr. Keppler:

This letter and its attachment respond to the item of non-compliance contained in the NRC IE Inspection Report 50-315/81-15 dated August 19, 1981, regarding the Containment Integrated Leak Rate Testing at Donald C. Cook Nuclear Plant. A two-week extension to respond to your letter was granted to us on September 15, 1981.

Very truly yours,

  
R. S. Hunter  
Vice President

attachment

cc: John E. Dolan  
R. C. Callen  
G. Charnoff  
R. W. Jurgensen  
D. V. Shaller - Bridgman  
Joe Williams, Jr.  
Region III Resident Inspector - Bridgman

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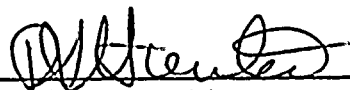
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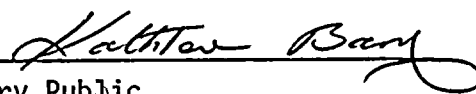
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STATE OF NEW YORK )  
COUNTY OF NEW YORK)

R. S. Hunter, being of sworn, deposes and says that he is a Vice President of the licensee Indiana & Michigan Electric Company, that he has read the foregoing response to IE Report No. 50-315/81-15, dated August 19, 1981 and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Vice President

Sworn and subscribed to before me this  
1st day of October 1981

  
\_\_\_\_\_  
Notary Public

NOTARY PUBLIC, State of New York  
No. 21-6000792  
Qualified in Queens County  
Certificate filed in New York County  
Commission Expires March 30, 1982

ATTACHMENT TO AEP:NRC:0615

The Unit 1 Containment Integrated Leak Rate Test (CILRT) was performed during July, 1981 as per Plant Procedure \*\*12 THP 4030 STP.202. This procedure was developed in accordance with Appendix J to 10 CFR 50, dated February 14, 1973.

Following pressurization, routine inspection of the valve lineups outside the containment building was performed. During this inspection, three leakage paths were identified and repaired as noted in the IE Inspection Report. There was no attempt to measure the leakage on these three leakage paths as the engineers responsible for the CILRT believed that the requirement noted in 10 CFR 50, Appendix J, Section III.A.1 (a) did not apply during this period. It was believed that this requirement applied only after the start of the stabilization period and prior to the actual overall leak rate measurements. The interpretation of the appropriate sections of Appendix J at the time of the test and its specification in the testing procedure was that the "official" start of the test was the beginning of the stabilization period rather than after containment inspection. This interpretation is supported by the fact that in the test procedure all valve lineups, instrument and tank venting operations, system draining, test instrument setup, etc. as well as the containment inspection and containment pressurization were listed as part of the "Initial Conditions" that had to be completed prior to carrying out the procedure. As the test procedure had been utilized and approved in four previous CILRTs at the Cook Plant site, it was considered acceptable by the engineers responsible for the test. As such, it was believed by these test personnel that it was acceptable to make 'equipment repairs or adjustments' prior to beginning the Type A test while completing the required "Initial Conditions." This understanding was partly based on the interpretation of Appendix J, Section III.A.1 (b) which reads in part that "Repairs of maloperating or leaking valves shall be made as necessary."

In the future, to avoid confusion in the interpretation of 10 CFR 50, Appendix J, the CILRT procedure has been revised to specify that no repairs or adjustments are to be made once the containment inspection has commenced. The procedure also indicates that if during the period between the initiation of the containment inspection, through and including the performance of a Type A test, potentially excessive leakage paths are identified as stipulated in Appendix J, that the test shall be terminated and the leakage through these paths will be measured utilizing local leakage testing methods.

Indiana & Michigan Electric Company proposes to schedule subsequent Type A tests at the existing  $40 \pm 10$  month intervals specified in Appendix J. We do not feel that a more frequent test schedule is warranted for the



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following reasons. First, this was the only single periodic test of the three CILRTs performed on Unit 1 which could possibly be considered a failure; second, there is some possibility that the acceptance criteria would have been met if the adjustments had not been made; and, third, the final measured leakage rate was less than the maximum allowable by 10 CFR 50, Appendix J. We therefore propose to conduct the fourth CILRT on Unit 1 during the 1985 Refueling Outage within the 10 year Plant In-Service Inspection Program.

11-11-11