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HERING,R.F. Indiana & Michigan Electric Co.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Responds to NRC 810921 ltr re requirements of NUREG-0737, Item 11.D.1, "PWR Relief & Safety Valve Test Program." Conditions tested envelope range to expected operating & accident conditions for facilities.

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# INDIANA & MICHIGAN ELECTRIC COMPANY

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April 7, 1982
AEP:NRC:0585B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NUREG-0737, Item II.D.1
PWR RELIEF & SAFETY VALVE TEST PROGRAM



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

In accordance with the initial recommendations of NUREG-0578, Section 2.1.2, as later clarified by NUREG 0737, Item II.D.1 and the NRC letter of September 29, 1981, each Pressurized Water Reactor (PWR) Utility on or before April 1, 1982 was to submit a preliminary evaluation supported by test results which demonstrates the capability of relief and safety valves to operate under expected operating and accident conditions. This letter is Indiana & Michigan Electric Company's response and is applicable to the Donald C. Cook Nuclear Power Plant, Units No. 1 and No. 2.

Indiana & Michigan Electric Company is a participant utility in the Generic PWR Safety and Relief Valve Test Program implemented by the Electric Power Research Institute (EPRI) at the request of participating PWR Utilities in response to the USNRC recommendations for safety and relief valve testing.

The primary objective of the Test Program was to provide full scale test data confirming the functionability of primary system power operated relief valves and safety valves for expected operating and accident conditions. A second objective of the program was to obtain sufficient piping thermal hydraulic load data to permit confirmation of models which may be utilized for plant unique analysis of safety and relief valve discharge piping systems. Relief valve tests were completed in August, 1981 and safety valve tests were completed in December, 1981. The reports prepared by EPRI documenting the Test Program results are as follows:

"Valve Selection/Justification Report"

This report documents that the valves selected for testing represent all participating PWR plant safety and relief valves.



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"Test Condition Justification Report" and the "Westinghouse Plant Conditions Justification Report"

These reports document the basis and justification of the valve test conditions for all participating PWR plants.

"Safety and Relief Valve Test Report"

This report provides evidence demonstrating the functionability of the valves selected for testing under selected test conditions for all participating PWR plants.

"Application of RELAP 5/MOD 1 for Calculation of Safety and Relief Valve Discharge Piping Hydrodynamic Loads"

This report presents an analytical model benchmarked against test data that may be used for plant unique analysis of safety and relief valve discharge piping systems.

All of the above documents have been received by Indiana & Michigan Electric Company. They are being transmitted to you by Mr. David Hoffman of Consumers Power Company on behalf of the participating PWR Utilities as part of our response to the preliminary submittal requirement.

The Donald C. Cook Nuclear Plant has Masoneilan Model #38-20721 power operated relief valves and Crosby Model #HB-BP-86-6M6 safety valves. These valves are identical to those tested in the EPRI valve test program. Indiana & Michigan Electric Company has performed a preliminary review of the test results and has concluded that the valves tested represent the safety and relief valve designs and that the conditions tested envelope the range of expected operating and accident conditions for the Donald C. Cook Nuclear Plant. Also, the above mentioned reports will be used to perform the final plant specific evaluations.

The September 29, 1981 NRC letter requested that plant specific final evaluations be submitted by July 1, 1982. In order to meet that date, plant specific evaluations have been initiated. Depending on the initial findings it may be necessary to continue the evaluation beyond July 1, 1982. If a longer evaluation period is required you will be notified on or before July 1, 1982.

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,

R. F. Hering
Vice President

cc: John E. Dolan - Columbus
R. W. Jurgensen
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
Joe Williams, Jr.
NRC Resident Inspector at Cook Plant - Bridgman