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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316

AUTH. NAME AUTHOR AFFILIATION
 HUNTER, R.S. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests working group meeting w/NRC, American Electric Power
 Svc Corp & Franklin Research Ctr to review Technical
 Evaluation Rept on environ equipment qualification findings.

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 TITLE: OR/Licensing Submittal: Equipment Qualification

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1. The first part of the document is a letter from the Director of the Federal Bureau of Investigation (FBI) to the Director of the Central Intelligence Agency (CIA). The letter is dated 10/10/50 and is signed by J. Edgar Hoover. The subject of the letter is the "Security of Information" and the "Control of Information".

Staff: Research and Development, Engineering, Production, Sales, Marketing, Finance, Administration, Legal, Human Resources, Information Systems, Quality Control, Customer Service, and Logistics.

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INDIANA & MICHIGAN ELECTRIC COMPANY

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January 24, 1983
AEP:NRC:0775

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
REQUEST FOR NRC/FRC/AEPSC ENVIRONMENTAL
EQUIPMENT QUALIFICATION (EQ) MEETING

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

Dear Mr. Denton:

By letter dated December 30, 1982, Mr. S. A. Varga (NRC) transmitted to Indiana & Michigan Electric Co. (I&MECo.) the Safety Evaluation Report (SER) for the Environmental Qualification of Safety-Related Electrical Equipment at the D. C. Cook Nuclear Plant Unit Nos. 1 and 2.

This letter and its Attachment acknowledge the receipt of the SER and request that a working group meeting be held to discuss several points of concern in the TER prepared by your consultant. We expect the meeting to be attended by members of your staff, American Electric Power Service Corporation (AEPSC) personnel and/or AEPSC's consultants, and the NRC's consultant on Equipment Qualification (EQ) for the D. C. Cook Nuclear Plant, i.e., the Franklin Research Center (FRC). Furthermore, for the reasons presented in the Attachment, we are requesting extensions on the response deadlines noted in Mr. S. A. Varga's letter referenced above.

This document has been prepared following Corporate Procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,



R. S. Hunter
Vice President

A048

RSH/os
cc: (attached)

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PDR ADDCK 05000315
P PDR

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

Attachment to AEP:NRC:0775

As stated in the SER attached to Mr. S. A. Varga's letter of December 30, 1982, we are being requested to review FRC's Technical Evaluation Report (TER) on EQ issues at the D. C. Cook Plant, and inform the NRC within seven (7) days of receipt of the SER whether any portions of certain identified TER pages still require proprietary protection. We first want to state for the record that we did not receive the entire TER (4 volumes) along with Mr. S. A. Varga's letter. We did not receive the two Volumes 2 of 2 (one for each Unit) until January 17, 1983, after having placed a request with our NRC Project Manager on January 14 to complete the transmittal.

In response to the NRC request identified above we note that most, if not all, of the proprietary information in FRC's TER has been obtained from manufacturers' and vendors' equipment descriptions and test reports. Thus, at present, we believe that any proprietary material used in FRC's review has been deemed so by the manufacturers and vendors, and is unlikely to be reclassified. We are pursuing this matter further and will, as requested by the SER, specifically identify the proprietary information and the specific rationale and justification for protection from public disclosure, consistent with the criteria of 10 CFR 2.790(b).

Our initial review of the TER has indicated that a working group meeting to be attended by NRC, FRC, and AEPSC personnel would be beneficial to our understanding of FRC's findings and NRC expectations regarding the format and specificity of our future responses to the SER. We are thus requesting that arrangements be made for such a meeting. We trust that this meeting could be held within the next two weeks, due to the time frame in which our SER responses are required. We expect that three (3) to six (6) members of the AEPSC staff and/or its consultants would attend this meeting.

The agenda for such a meeting should include an item-by-item review of the TER findings, and a discussion of potential responses to each item. We believe that a complete review will require a two-day meeting. Other topics to be discussed during the meeting include, but are not limited to, the following:

- 1) Various equipment item reviews in the TER include pages reproduced from our AEP:NRC:0578 submittal dated September 23, 1981. These pages have, in certain cases, been revised via our June 11, 1982 submittal (AEP:NRC:0578B). FRC's review does not reflect this fact.
- 2) We do not understand FRC's rejection of arguments for equivalence between tested equipment and installed plant equipment.

- 3) It is our understanding that the Arrhenius technique was acceptable for extending operating time qualifications. This technique does not appear to have been accepted by FRC during their review.
- 4) The qualification of greases and lubricants was accepted by a previous SER dated May 26, 1981. The recent TER has rejected the qualification. What is the new information on which this change of opinion has been based?
- 5) Some of the test reports cited in our AEP:NRC:0578 submittal were superseded and/or supplemented by test reports referenced in our AEP:NRC:0578B submittal. The TER appears to reference, for various items, only the earlier reports.

We trust that a working group meeting would clear up these points and lead to a common understanding of the NRC's concerns regarding EQ.

Finally, due to the extent of the material to be reviewed and the numerous items to be responded to, we are hereby requesting that the deadlines presented in Mr. S. A. Varga's letter of December 30, 1982, be extended for our SER responses. In particular, we request that our required response regarding justification for continued operation be extended from thirty (30) days after receipt of the SER to thirty (30) days after the above requested meeting is held. We also request that the response deadline for the schedule of proposed corrective actions be extended from ninety (90) days after receipt of the SER to one hundred twenty (120) days after the working meeting date. We believe these proposed schedules to be realistic and representative of the time required to hold the meeting, assimilate the views of NRC and FRC, review each item, and prepare the submittals. Lastly, we request that the deadline for our response regarding justification of proprietary material in the TER be extended by two (2) additional weeks, i.e. until February 18, 1983. We are presently reviewing the material contained in the FRC assessment, but require more time to contact and receive responses from the equipment manufacturers and vendors.