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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: Provides justification for continued operation in response to 821230 SER on environ qualification of safety-related electrical equipment.

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March 4, 1983
AEP:NRC:0775B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
ENVIRONMENTAL QUALIFICATION OF SAFETY-RELATED ELECTRICAL EQUIPMENT; JUSTIFICATION FOR CONTINUED OPERATION

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

Dear Mr. Denton:

This letter provides a response to Mr. S. A. Varga's letter of December 30, 1982, which transmitted to Indiana & Michigan Electric Co. (I&MECo) the Safety Evaluation Report (SER) for the Environmental Qualification of Safety-Related Electrical Equipment at the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2. In particular, Mr. S. A. Varga requested that we review the associated Technical Evaluation Report (TER) prepared by Franklin Research Center (FRC), and provide justification for continued operation of the Donald C. Cook Nuclear Plant for those items of equipment which FRC classified as being in NRC Category I.B., "Equipment Qualification Pending Modification," Category II.A., "Equipment Qualification Not Established," and Category II.B., "Equipment Not Qualified."

We have reviewed the NRC SER and its associated TER, and have concluded that the continued safe operation of the D. C. Cook Nuclear Plant is adequately assured. We note that the results of FRC's review, as presented in the TER, have not identified any equipment items in NRC Category II.B., "Equipment Not Qualified." Furthermore, our review of those equipment items which FRC identified as belonging in NRC Categories I.B. and II.A. indicates that justification exists for continued plant operation. Our review findings which support this conclusion include, but are not limited to, the following:

(1) On June 11, 1982, we transmitted to the NRC our AEP:NRC:0578B submittal. That letter and its attachments provided a response to the SER on Environmental Qualification of Safety-Related Electrical Equipment transmitted via Mr. S. A. Varga's letter to Mr. J. E. Dolan (I&MECo), dated May 26, 1981. Although the cover letter to our AEP:NRC:0578B submittal stated that the response superseded all of our previous submittals, our review of the FRC TER indicates that

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FRC-identified equipment deficiencies in NRC Categories I.B. and II.A. have been based upon our earlier transmittals regarding equipment qualification. (However, the June 11, 1982, submittal did not include all of the missing documentation identified by FRC's TER as necessary to establish equipment similarity. See Item (2) below). We note that the TER review of certain equipment items includes System Component Evaluation Worksheets (SCEWS) reproduced from our AEP:NRC:0578 submittal of September 23, 1981. Revised worksheets were included in Attachments 4 and 5 of the AEP:NRC:0578B letter. Certain equipment items which appear in the TER have, in fact, been deleted in our June 11, 1982 submittal (e.g., item #62, Unit Nos. 1 and 2; item #84, Unit Nos. 1 and 2). Furthermore, equipment items which we added to our AEP:NRC:0578B submittal do not appear in the TER.

To the best of our knowledge, the attachments to our June 11, 1982, submittal provide additional technical information which addresses many of the outstanding NRC concerns and FRC-identified deficiencies which appear in the TER. As an example, we note that Section 4.3.2 of the TER requires that we verify that the containment spray system is not subjected to a disabling single-component failure. This information is provided in Attachment 8 to our AEP:NRC:0578B submittal. Additional information on chemical spray characteristics, flood-up tubes, submergence outside containment, etc., may be found in our June 11, 1982, submittal.

(2) The FRC TER identifies numerous equipment items for which qualification has not been established owing to a lack of documentation available to FRC. Although in the past we have submitted some test reports and engineering analyses to the NRC or FRC in support of our equipment qualification, we have retained additional documentation in-house. We believe that we can support the information contained in the attachments to the AEP:NRC:0578B submittal. Furthermore, we note that documentation not presently available to FRC will establish qualification for many of our electrical equipment items. We do not believe that a lack of submitted documentation constitutes an indication of equipment inability to function after an accident. We trust that we can resolve these documentation concerns with the NRC staff as part of our schedule for proposed corrective actions, to be submitted by May 20, 1983, in accordance with the final environmental qualification rule 10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety in Nuclear Power Plants," recently published in the Federal Register (Vol. 48, No. 15, dated 1/21/83).

(3) The FRC TER identifies numerous deficiencies in equipment item qualified life, aging evaluation, and replacement/maintenance schedules. As noted in Attachment 7 to our AEP:NRC:0578B submittal, we have committed to establish an aging program which will include aging analyses and the establishment of a surveillance/maintenance/ replacement schedule. We have, in fact, recently contracted with EDS Nuclear Inc. of Melville, New York, to perform this aging evaluation program. Our upcoming May 20, 1983, submittal will further inform the NRC staff of the status of the aging program, and should address the outstanding aging-related deficiencies identified in the FRC TER.

In summary, we believe that our AEP:NRC:0578B submittal dated June 11, 1982, the documentation available in our files, and our review of the FRC TER indicate that there is justification for safe continued plant operation.

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

RSH/md

cc: John E. Dolan - Columbus
M. P. Alexich
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