

ATTACHMENT NO. 2
TO AEP:NRC:0514G

INDIANA & MICHIGAN ELECTRIC COMPANY'S
RESPONSES TO THE RECOMMENDATIONS MADE IN
SECTION 6

Response to Item 6.1

ANSI N14.6
Section 5.1.3

Maintenance and inspection procedures will be revised to include a visual inspection of the lift rig in the preparation of the equipment for use.

Section 5.1.4

Maintenance procedures for the reactor vessel and internal lift rigs are outlined in maintenance procedures MHP 5021.001.003A & B.

Section 5.1.5
5.1.5.1 and
5.1.5.2

It is obvious from their designs, size and weights, that these rigs are special lifting devices and can only be used for their intended purpose.

The size of the rigs precludes their removal from the containment unless dismantled. Maintenance procedure MHP 5021.001.003 A&B will indicate the limitation wherein dismantling requires a special procedure approved by the PNSRC. All removable pins of subassemblies will be marked and identified by unit.

Section 5.1.6
5.1.7 and 5.1.8

Operating and maintenance instructions will be reviewed to ensure that they contain the requirement to keep maintenance logs and record repair and testing history incidents.

Response to Item 6.2

This inspection was initially performed by Westinghouse.

Response to Item 6.3

Indiana & Michigan Electric Co. feels that the Westinghouse recommendation to visually inspect welds is not responsive to NUREG-0612. Instead of this visual inspection, we will conduct a program of non-destructive

examination of load bearing welds to ensure that all welds will be examined over a normal inservice inspection interval of 10 years in a manner consistent with the ASME Boiler and Pressure Vessel Codes for Class 2 Component Supports. Dimensional checking is not included in our program since these structures are large (about 14 feet diameter by 40 feet high) and the results of dimensional checking would be questionable. Other checks on critical load path parts, such as pins, are also not included since an examination for these items would require disassembly of the special lift devices.

Response to Item 6.4

This item is covered in the previous discussion. (Response to 6.3)

Response to Item 6.5

The non-destructive examination program, discussed in 6.3 above, will include the head and internal lift rig sling blocks. If any lamellar tearing is indicated the sling blocks will be changed to a forged block with welded side lugs to reduce the number of welds and eliminate this concern.

Response to Item 6.6

No change will be made to the reactor vessel internals lift rig.

ATTACHMENT NO. 3

~~AEP:NRG:0514G~~

