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

SUBJECT: Suppls & amends 830520 & 830810 requests for extensions required in 10CFR50.49 re equipment environ qualification.

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September 26, 1983
AEP:NRC:0775F

Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
EQUIPMENT ENVIRONMENTAL QUALIFICATION
DEADLINE EXTENSION REQUESTS

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

Dear Mr. Denton:

This letter supplements and amends our requests for extensions of the time required in 10 CFR 50.49 (Environmental Qualification). We previously made our requests in letters dated May 20, 1983 (AEP:NRC:0775C) and August 10, 1983 (AEP:NRC:0775D). Based upon the meeting we held on September 13, 1983 and subsequent discussions with your staff, we are providing the reasons for the extension requests and the dates to which we request these extensions below:

(a) Aging Qualifications. We are requesting an extension to March 31, 1985 for both Units 1 and 2, on the deadline for the aging qualification parameter and the development of a surveillance/maintenance/replacement program, for all items in our submittal AEP:NRC:0775C. This request also applies to those items b through h listed below. These extensions are needed to complete aging analysis, engineering evaluations of that analysis, and development of the surveillance, maintenance, and replacement program from that analysis. As stated in our submittal AEP:NRC:0775D, our plan is to establish an expedited program to replace non-qualified equipment or to provide alternate measures to ensure accomplishment of the safety functions. Since the final results of this program are not known, we cannot state with certainty that we will be able to replace non-qualified equipment prior to March 31, 1985 without bringing Unit 2 to an unscheduled outage. If it becomes apparent toward the end of 1984 that we cannot meet the March 1985 date on Unit 2, we will notify you and request the appropriate extension.

(b) Resistance Temperature Detectors (RTDs). A request for extension of the qualification date to March 31, 1985 for both Units 1 and 2 is hereby made for the equipment items

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[illegible]

identified, in our IE Bulletin 79-01B submittal (AEP:NRC:0578B) and our 10 CFR 50.49 submittal (AEP:NRC:0775C), as NTR-110, -120, -130, -140, -210, -220, -230, and -240. This request is made for the reasons previously outlined in Attachment 4 to AEP:NRC:0775C. The request is also made to obtain confirmation from the equipment supplier that containment spray chemical conditions were simulated during the qualification testing. Since this is tied closely to the Appendix R fire protection program, which was scheduled for completion in September 1985, we do not know at this time whether the new instrumentation can be delivered and installed in Unit No. 2 by the March 31, 1985 date. If it becomes apparent toward the end of 1984 that we cannot meet the March 31, 1985 date on Unit 2, we will notify you and request the appropriate extension.

(c) Resistance Temperature Detectors (RTDs). A request for extension of the qualification date to March 31, 1985 for both Units is hereby made for the items identified, in our IE Bulletin 79-01B submittal (AEP:NRC:0578B) and our 10 CFR 50.49 submittal (AEP:NRC:0775C), as NTP-110, -111, -120, -121, -130, -131, -140, -141, -210, -211, -220, -221, -230, -231, -240, and -241. This request is made to provide for consistency with paragraphs a (aging) and b (NTRs) noted above. This request is also made to obtain confirmation from the equipment supplier that containment spray chemical conditions were simulated during the qualification test. Such confirmation should be obtainable significantly before the March 31, 1985 extension request data.

(d) Equipment with identifications prefaced with BLP or NPS. A request for extension of qualification date to March 31, 1985 for both Units is hereby made for the items previously identified, in our IE Bulletin 79-01B submittal (AEP:NRC:0578B) and our 10 CFR 50.49 submittal (AEP:NRC:0775C), as BLP-110, -111, -112, -120, -121, -122, -130, -131, -132, -140, -141, and -142, and NPS-121 and -122. This request is made to allow for additional review and, as necessary, replacement, relocation, and/or testing of the equipment items due to submergence qualification questions. Because equipment relocation, replacement or additional equipment may be necessary to assure qualification of these items, we cannot say with certainty that we will be able to have such modifications performed prior to March 31, 1985 without bringing Unit 2 to an unscheduled outage. If it becomes apparent toward the end of 1984 that we cannot meet the March 31, 1985 date on Unit 2, we will notify you and request the appropriate extension.

(e) Lubricants. A request for extension of qualification date to June 3, 1984 is hereby made for the various lubricants and greases addressed in our IE Bulletin 79-01B submittal (AEP:NRC:0578B). This request is made to obtain and/or review

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(a) [illegible]

(b) [illegible]

(c) [illegible]

the actual test reports on these items, even though it is our understanding that these items are not within the scope of the 10 CFR 50.49 rule.

(f) Boston Insulated Wire Item #3075 (shielded twisted pair #16 AWG Cu) Samuel Moore Item #3075 (shielded twisted pair #16 AWG Cu) and instrument cable splice (Raychem) at terminal box near instrument. A request for extension is hereby made to March 31, 1985. These cables were qualified by a full steam, chemical spray, and radiation test. They were also qualified by another test that included steam, chemical spray, and submergence for approximately ten days. Since the cables will be submerged following an accident inside containment and are required to remain functional for 4 months, we will require additional time to evaluate the applicability of the above tests, and to perform additional testing of the cables and/or replacement or relocation as necessary.

(g) Documentation. We also need an extension to June 3, 1984 to complete our documentation files. Although most documentation is in place, there are a few items where we must go back to the vendors to assure complete traceability of the qualified components. We estimate that the program for this activity will take approximately nine months to complete.

(h) Regulatory Guide 1.97 (Rev. 2) Equipment Items. As noted in Attachment 3 to our submittal AEP:NRC:0775C, the equipment items for Regulatory Guide 1.97 (Rev. 2) are being reviewed with the program established in our letter AEP:NRC:0773A. Due to the anticipated schedule for this task, we had requested an extension to completing the activities addressed in Attachment 3 to our AEP:NRC:0775C. It is understood from discussions at the September 13, 1983 meeting and subsequent telephone conversations that an explicit extension request is not required for the Regulatory Guide 1.97 (Rev. 2) equipment items. We understand that if it is determined that a significant qualification problem exists on installed plant equipment, then the provisions of 10 CFR 50.49 paragraph (h) are applicable. We will therefore continue with our Regulatory Guide 1.97 review program as committed to in Attachment 1 to AEP:NRC:0773A. This commitment requires a February 1985 status report on how we will meet Regulatory Guide 1.97. The program, also, has an implementations phase completion target of November, 1985. Therefore, considering the discussion presented above, our AEP:NRC:0775C is amended to include the following statements:

> If during our review of equipment for Regulatory Guide 1.97 (Rev. 2) requirements any significant equipment qualification problems are discovered, then the provisions of 10 CFR 50.49, paragraph (h) will be followed. If necessary, this statement will apply to any

[illegible]

[illegible]

(c) [illegible]

(d) [illegible]

additional new equipment subsequently identified as being within the scope of 10 CFR 50.49. It will also apply to equipment identified in Attachment 1 to AEP:NRC:0775C and other equipment installed in the plant requiring upgrading due to Regulatory Guide 1.97 requirements.

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,

M. P. Alexich
Vice President

MPA/mjg

cc: John E. Dolan - Columbus
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
E. R. Swanson - NRC Resident Inspector, Bridgman