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ACCESSION NBR:8504090014 DOC.DATE: 85/04/02 NOTARIZED: NO DOCKET #
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
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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: Forwards addl info re inadequate core cooling instrumentation, consisting of milestones schedule for reactor vessel level instrumentation sys. Encl 2 to safety evaluation forwarded w/SA Varga 831219 ltr addressed.

DISTRIBUTION CODE: A002D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 6
TITLE: OR Submittal:Inadequate Core Cooling (Item II.F.2) GL 82-28

NOTES: 05000315
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April 2, 1985

AEP:NRC:0761D

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
INADEQUATE CORE COOLING INSTRUMENTATION

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

Dear Mr. Denton:

In our letter AEP:NRC:0761C dated August 20, 1984, Indiana & Michigan Electric Company (IMECo) committed to provide additional information on the Donald C. Cook Nuclear Plant Inadequate Core Cooling Instrumentation (ICCI) system. This information consists of a schedule of milestones for implementation of the Reactor Vessel Level Instrumentation System (RVLIS), and addresses Enclosure 2 to the Safety Evaluation forwarded with Mr. S. A. Varga's December 19, 1983, letter.

The requested information is provided in the Attachment to this letter.

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,

M. P. Alexich
Vice President RBIC 4/2/85

MPA/dam

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
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G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman

A00

ATTACHMENT TO AEP:NRC:0761D
REACTOR VESSEL LEVEL INSTRUMENTATION SYSTEM (RVLIS) MILESTONES
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2

This Attachment provides a schedule of milestones for implementation of the Donald C. Cook Nuclear Plant Reactor Vessel Level Instrumentation System (RVLIS). The information herein responds to Enclosure 2 of the NRC Safety Evaluation attached to Mr. Steven A. Varga's letter dated December 19, 1983.

With regard to the dates associated with the Emergency Operating Procedures (EOPs), it is noted that the schedule was derived with the assumption that needed work efforts would be in line with the Procedures Generation Package (PGP) previously submitted for NRC review. If the NRC requests modification of the PGP, the dates delineated herein will likely be delayed.

Milestone #1:

Submit the final design description (by licensee). Complete the documentation requirements of NUREG-0737, Item II.F.2, including all plant specific information items identified in applicable NRC evaluation reports for generic approved systems.

Schedule

References (1) and (2) provide lists of numerous documents, pertaining to the RVLIS design description, which have previously been transmitted to the NRC by the licensee or Westinghouse Electric Corporation (W). It must be noted, however, that Reference (2) indicated W would transmit the Equipment Qualification Data Package No. ESE-50 (RVLIS Umbrella Report) directly to the NRC. By letter dated February 12, 1985 (Reference (3)), W stated that this document would not be issued because the RVLIS hardware was qualified by other reports.

Additionally, in Reference (4) we stated that we planned to modify RVLIS, subject to final engineering and design review. This modification was to have consisted of relocating the existing wide range Reactor Coolant System (RCS) pressure transmitters from inside containment to outside containment, where they were to be connected to RVLIS through level transmitter access assemblies. We have now decided to install additional transmitters outside containment, rather than relocate the existing wide range pressure transmitters to that location. This installation, together with the required calibration, is scheduled to take place during the upcoming Unit 1 and Unit 2 refueling outages which are expected to begin in April and November 1985, respectively.

Milestone #2:

Approval of Emergency Operating Procedure (EOP) technical guidelines (by NRC). The EOP technical guideline which incorporates the selected system must be based on the intended uses of that system as described in approved generic EOP technical guidelines.

Schedule

The D. C. Cook Nuclear Plant EOP Procedures Generation Package (PGP), which included the plant specific technical guidelines used in the development of the EOPs, was transmitted to the NRC via Attachment 2 to Reference (5). The schedule for completion of this milestone is contingent upon NRC staff approval of the PGP.

Milestone #3:

Inventory tracking systems installation complete (by licensee).

Schedule

RVLIS installation is complete, with the exception of the aforementioned addition of wide range RCS pressure transmitters outside containment (see schedule for Milestone #1 above). This installation, together with the required calibration, is scheduled to take place during the upcoming Unit 1 and Unit 2 refueling outages which are expected to begin in April and November 1985, respectively.

Milestone #4:

Inventory tracking systems functional testing and calibration complete (by licensee).

Schedule

RVLIS is functional and calibration is complete, with the exception of the aforementioned addition of wide range RCS pressure transmitters outside containment (see schedule for Milestone #1 above). This installation, together with the required testing and calibration, is scheduled to take place during the upcoming Unit 1 and Unit 2 refueling outages which are expected to begin in April and November 1985, respectively.

Milestone #5:

Prepare revisions to plant operating and emergency procedures, based on approved EOP guidelines (by licensee).

Schedule

As shown in Attachment 3 to Reference (6), the EOP revision process began in November 1983 and ended about October 1984. The implementation of the final plant specific revision of the EOPs which include incorporation of comments from various reviews, is currently scheduled for December 1985.

Milestone #6:

Implementation letter report to NRC (by licensee). Implementation letter report content is suggested by Enclosure 2 to the Safety Evaluation attached to Mr. S. A. Varga's December 19, 1983, letter.

Content of Implementation Letter Report

It is our intent to address the content of the implementation letter report in the following manner, unless we hear differently from the NRC staff:

NRC Item (1): Notification that the system installation, functional testing, and calibration is complete and the test results are available for inspection.

Anticipated Response: Most of this information was provided in Reference (4). The report will confirm the addition of the wide range pressure transmitter installation on RVLIS.

NRC Item (2): Summary of licensee conclusions based on test results, e.g.:

(a) The system performs in accordance with design expectations and within design error tolerances; or

(b) Description of deviations from design performance specifications and basis for concluding that the deviations are acceptable.

Anticipated Response: Most of this information was provided in References (4) and (7). The report will update the effect of the new wide range pressure transmitter installation on RVLIS performance.

NRC Item (3): Description of any deviations of the as-built system from previous design descriptions with any appropriate explanation.

Anticipated Response: Most of the as-built detail has been described in References (1), (2), and (4). The report will update any further as-built deviations after addition of the wide range pressure transmitters.

NRC Item (4): Request for modification of Technical Specifications to include all ICC instrumentation for accident monitoring.

NRC Item (5): Request for NRC approval of the plant specific installation.

NRC Item (6): Confirm that the EOPs used for operator training will conform to the technical content of NRC approved EOP guidelines (generic or plant specific).

Anticipated Response: The NRC has previously approved the generic EOPs for implementation. Once we receive NRC approval of our PGP, this item will be considered complete.

Schedule

Since the content of this report will necessarily depend upon the addition of the wide range RCS pressure transmitters outside containment (see schedule for Milestone #1 above), it is anticipated that the implementation letter report will be transmitted approximately four (4) months following the end of the Unit 2 1985 refueling outage.

Milestone #7:

Perform procedure walk-through to complete task analysis portion of RVLIS design (by licensee).

Schedule

As noted in Attachment 2 to Reference (5), a two-phase Verification/ Validation (V/V) program is currently being carried out. This program is intended to determine if the actions specified in the EOPs can be performed by the operators to effectively respond to emergency conditions. It is currently anticipated that the V/V program will be completed December 1985.

Milestone #8:

Turn on system for operator training and familiarization (by licensee).

Schedule

It is currently anticipated that the RVLIS will be available for operator training and familiarization following installation, testing, and calibration of the wide range RCS pressure transmitters in each Unit.

Milestone #9:

Approval of plant specific installation (by NRC).

Schedule

The schedule for completion of this milestone is contingent upon the NRC staff.

Milestone #10:

Implement modified operating and emergency procedures (by licensee).

Schedule

The schedule for Milestone #10 must necessarily depend upon the NRC staff's approval of the plant specific installation (Milestone #9). Furthermore, since the procedures are an integrated set and some in the set assume an operable RVLIS, implementation of the D. C. Cook Unit 2 procedures requiring RVLIS may have to be delayed until the Unit 2 RVLIS is operable. Therefore, although operators will be trained in the use of RVLIS, we will not be able to actually achieve this milestone for both Units until after the above activities are completed. It is anticipated, however, that the modified procedures may be implemented within 90 days of NRC acceptance, following submittal of the implementation report for each Unit.

References

(1) Letter No. AEP:NRC:0761, R. F. Hering (IMECo) to H. R. Denton (NRC), dated March 11, 1983. "Inadequate Core Cooling Instrumentation System (Generic Letter No. 82-28) Request For Extension."

(2) Letter No. AEP:NRC:0761A, R. F. Hering (IMECo) to D. G. Eisenhut (NRC), dated June 22, 1983. "Inadequate Core Cooling Instrumentation (Generic Letter No. 82-28)."

(3) Letter No. AEP-85-516, C. C. Swist (W) to S. L. Mar (AEPSC), dated February 12, 1985. "RVLIS Documentation."

(4) Letter No. AEP:NRC:0761C, M. P. Alexich (IMECo) to H. R. Denton (NRC), dated August 20, 1984. "Inadequate Core Cooling Instrumentation System Status Report."

(5) Letter No. AEP:NRC:0773I, M. P. Alexich (IMECo) to H. R. Denton (NRC), dated September 28, 1984. "June 12, 1984, Confirmatory Order -- Status Report on Detailed Control Room Design Review (DCRDR) and Upgraded Emergency Operating Procedures (EOPs)."

(6) Letter No. AEP:NRC:0773H, M. P. Alexich (IMECo) to H. R. Denton (NRC), dated August 6, 1984. "May 8, 1984, Request For Additional Information on Detailed Control Room Design Review (DCRDR)."

(7) Letter No. AEP:NRC:0761B, M. P. Alexich (IMECo) to H. R. Denton (NRC), dated February 3, 1984. "Inadequate Core Cooling Instrumentation; Preliminary Response to Request For Additional Information."