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 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316  
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 ALEXICH, W.P. Indiana & Michigan Electric Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards addl info re 831104 & 840330 responses to Generic  
 Ltr 83-28 re reactor trip sys & post-accident testing, per  
 850311 request.

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NOTES: 05000315  
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# INDIANA & MICHIGAN ELECTRIC COMPANY

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April 10, 1985  
AEP:NRC:0838H

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
GENERIC LETTER 83-28  
ADDITIONAL INFORMATION REQUESTED IN RESPONSE TO  
GENERIC LETTER 83-28

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 a March 11, 1985 letter from Steven A. Varga to Mr. John Dolan. In the letter your staff indicated several items as being incomplete in our previous submittals made to address Generic Letter 83-28 (reference AEP:NRC:0838A and B dated November 4, 1983 and March 30, 1984). Attachment 1 to this letter includes a list of the items for reference.

Attachment 2 to this letter contains additional information to clarify and/or supplement the responses provided in our submittals, AEP:NRC:0838A and B.

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 4/10/85

cm  
Attachment

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

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COOK-1&2

Item 2.1 (part 1) - Incomplete

Licensee must supply a statement confirming that reactor trip system components were reviewed and that they are identified as safety-related on documents, procedures, and information handling systems.

Item 2.1 (part 2) - Incomplete

Licensee needs to submit detailed information describing their vendor interface program for reactor trip system components. Information supplied should state how the program assures that vendor technical information is kept complete, current, and controlled throughout the life of the plant and should also indicate how the program will be implemented at COOK-1&2.

Item 2.2.2 - Incomplete

The staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors of safety-related equipment and the utility. Accordingly the licensee will need to supplement his response to address this concern. Additional information should describe how current procedures will be modified and new ones initiated to meet the elements of this concern.

Item 3.1.3 - Incomplete

Results of review of test and maintenance programs shall identify any post-maintenance testing that may degrade rather than enhance safety and shall describe actions to be taken including submitting needed Technical Specification changes.

Item 3.2.3 - Incomplete

Same as Item 3.1.3.

Item 4.5.3 - Incomplete

Licensee needs to supply results of review of existing or proposed intervals for on-line testing considering the concerns of items 4.5.3.1 to 4.5.3.5 of the generic letter. This information shall show how the selected intervals result in high reactor trip system availability and include any proposed Technical Specification changes resulting from this review.

Item 2.1 (Part 1)

We have reviewed all reactor trip system components. Attachment 1 to our submittal (Reference AEP:NRC:0838A dated November 4, 1983) listed all such components. These components, with exceptions identified by an asterisk, are on our N-List for safety-related equipment. Attachment 1 gave a rationale for the exclusion of components from the list.

As detailed in our submittal (Reference AEP:NRC:0838B dated March 30, 1984, Section 2.2.1.6), we are in the process of implementing a computerized component classification data-base which will incorporate references to existing relevant drawings and procedures. The new data-base has been designed to integrate our existing documents and information systems to effectively manage the purchase, maintenance and replacement of safety-related components.



Item 2.1 (Part 2) and 2.2.2

Detailed information describing the vendor interface program for safety-related components was presented in Attachment III to our submittal Reference AEP:NRC:0838B dated March 30, 1984. This description, given under Section 2.2.2, pertains to a proposed vendor interface system for all safety-related components, including reactor trip system components. Therefore, the program detailed in this previous submittal is the system of interface to be used to ensure that vendor information for trip system components, as well as all safety-related components, is complete, current, and controlled throughout the life of D. C. Cook, Units I and II.

The corporate-level general procedure which formally establishes the requirements for the Vendor Information Control System (VICS) has been approved.

Vendors of all reactor trip system components were initially contacted by March 30, 1984 as indicated in AEP:NRC:0838B. This was done to ensure compliance with Item 2.1 as soon as possible after the issuance of Generic Letter 83-28. The VICS we described in Attachment III of our submittal, AEP:NRC:0838B dated March 30, 1984, will assure continuation of vendor information distribution of all safety-related components, including the reactor trip system components.

As to the concerns of the inadequacies of the NUTAC program expressed in your latest communication (03/11/85), we find that the VICS, outlined in our submittal (Reference AEP:NRC:0838B), is a program that differs in the philosophy found with the NUTAC program. We have chosen a direct interface with the vendors of our plant's safety related (including reactor trip system) components, as opposed to relying on INPO's dissemination of the like information. However, we do foresee the SEE-IN and NPRDS programs as valuable supplements to our VICS, and we are, at present, participants in these programs.



Item 3.1.3 and 3.2.3

We do not anticipate any Technical Specification revisions being initiated directly as a result of either Item 3.1.3 or 3.2.3 of Generic Letter 83-28. However, D. C. Cook, Units I and II, Technical Specifications are currently in the process of being reviewed. These reviews with subsequent revisions where appropriate, are motivated not only from the standpoint of enhanced safety via an increase in safety system reliability and operability, but also from the standpoints of a reduction in the occupational dose for maintenance personnel and an increase in the readability and clarity of the Technical Specifications to promote an easier and more uniform interpretation.

This is part of an intensive, ongoing, large-scope project, with the initiatives generated from within AEPSC, from industry sponsored investigations (e.g., WOG Subcommittee on Technical Specifications), and from Commission directives. As a result of this program we may submit applications for reduced surveillance testing, with the supporting justifications to demonstrate that safety is enhanced rather than degraded with reduced testing, as the areas for enhancement are identified.



Item 4.5.3

Intervals for on-line functional testing of the reactor protection system (RPS) have, in a generic sense, been reviewed by Westinghouse. An extensive probabilistic risk assessment was performed by Westinghouse, with the analysis presented in WCAP-12071. Although we anticipate no Technical Specification changes as a direct result of Item 4.5.3, changes to intervals of RPS channel functional testing will be based upon guidance obtained from WCAP-12071 if any are necessary and deemed appropriate based on our internal review.