

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8505210421 DOC. DATE: 85/05/17 NOTARIZED: NO DOCKET #  
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315  
 AUTH. NAME: ALEXICH, M. P. AUTHOR AFFILIATION: Indiana & Michigan Electric Co.  
 RECIP. NAME: DENTON, H. R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests relief from provisions of ASME Boiler & Pressure Vessel Code Section XI, Subsection IWB-5000 & IWC-5000 as outlined in encl ECCS flow diagrams. Code relief proposed for piping section tests & insps. Fee paid.

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 1/1  
 TITLE: OR Submittal: Inservice Inspection/Testing

NOTES: OL: 10/25/74 05000315

RECIPIENT ID CODE/NAME		COPIES LTTR ENCL		RECIPIENT ID CODE/NAME		COPIES LTTR ENCL	
NRR ORB1 BC 01		7	7				
INTERNAL:	ACRS	16	10	10	ADM/LFMB	1	0
	ELD/HDS3		1	0	NRR/DE/MEB 15	1	1
	NRR/DE/MTTB	14	1	1	NRR/DL/TAPMG	1	1
	REG FILE	04	1	1	RGN3	1	1
EXTERNAL:	LPDR	03	1	1	NRC PDR 02	1	1
	NSIC	05	1	1			

Drawings To PM

Rec'd w/check 150.00



# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

May 17, 1985

AEP:NRC:0070R

Donald C. Cook Nuclear Plant Unit No. 1  
Docket No. 50-315  
License No. DPR-58  
INSERVICE INSPECTION PRESSURE TEST - CODE RELIEF

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

Dear Mr. Denton:

This submittal and its attached flow diagrams are made pursuant to 10 CFR Section 50.55a(g)(6)(i). Code relief is requested from the provisions of ASME Boiler and Pressure Vessel Code Section XI, subsection IWB-5000 and IWC-5000. We request code relief and alternate tests as proposed for the following piping sections:

1. Emergency Core Cooling System, Flow Diagram 1-5143

Piping Boundaries:

- (a) Accumulator No. 1 Discharge Piping -  
Valves IMO-110, SI-166-1, IRV-115, SI-168-1
- (b) Accumulator No. 2 Discharge Piping -  
Valves IMO-120, SI-166-2, IRV-125, SI-168-2
- (c) Accumulator No. 3 Discharge Piping -  
Valves IMO-130, SI-166-3, IRV-135, SI-168-3
- (d) Accumulator No. 4 Discharge Piping -  
Valves IMO-140, SI-166-4, IRV-145, SI-168-4

ISI Code Class-2 Requirements:

For a system design pressure of 2485 psig, Article IWC-5000 of Section XI code requires the piping to be tested at a pressure of 3106 psig and temperature not less than 100°F.

Code Relief Request:

We request allowing the above sections of piping to be tested at a pressure of 2280 psig at a temperature above 100°F. By allowing this relief, the test can be performed during Mode 3

8505210421 850517  
PDR ADDCK 05000315  
Q PDR

Rec'd w/ check \$150.00

A047 Drawings to PM



with the Reactor Coolant System (RCS) pressure at 2280 psig and temperature greater than or equal to 500°F. The RCS pressure will be used to block the check valves (SI-166-1, SI-166-2, SI-166-3, SI-166-4) closed, therefore, limiting maximum pressure to 2280 psig.

Basis For Relief Request:

The section of piping upstream of check valves SI-166-1 thru 4 cannot be tested at a pressure of 3106 psig without making extensive temporary modifications to keep the valves closed. The modifications would require: (1) disassembly of the valves, (2) welding of temporary blocks (on the downstream side) inside the valve bodies to hold a "jack screw" type arrangement to keep the valve closed, (3) removal of the temporary blocking devices from the valves after testing and (4) performing necessary non-destructive testing to assure the integrity of the valve bodies before returning them to service. The piping downstream of these valves is part of the RHR System and carries radioactive fluid during normal operation. Therefore, plant personnel will be subjected to substantial radiation exposure and radioactive contamination in order to carry out any modifications for the test.

We believe this to be a reasonable code relief request since the proposed test pressure is, in fact, higher than the 2235 psig nominal operating pressure in the short sections (less than 5 feet) of the piping systems for which the relief is requested.

2. CVCS - Reactor Letdown and Charging, Flow Diagram 1-5129

Piping Boundaries:

- (a) 2-Inch Aux. Spray Piping -  
Valves QRV-51, CS-325
- (b) Normal Charging Loop 4 Cold Leg -  
Q RV-62, CS-328-L4, CS-326 and CS-327
- (c) Alternate Charging Line to Loop 1 Cold Leg -  
Valves QRV-61, CS-328-L1

ISI Code-1 Requirement for Item (a):

For operating pressure of 2235 psig, Article IWB-5000 of Section XI code requires the piping to be tested at a pressure of 2458 psig and temperature not less than 100°F.

ISI Code Class-2 Requirement for Items (b) and (c):

For a design pressure of 2735 psig, Article IWC-5000 of Section XI code requires the piping to be tested at a pressure of 3418 psig and temperature not less than 100°F.

[illegible]

Code Relief Request:

We propose testing the above sections of piping at a pressure of 2280 psig at a temperature above 100°F. The test will be performed during Mode 3 with the RCS pressure at 2280 psig and temperature greater than or equal to 500°F. The RCS pressure will be used to block the check valves CS-329L1, CS-329L4 and CS-325 closed therefore limiting maximum pressure to 2280 psig.

Basis for Relief Request for Items 2(a), 2(b), and 2(c):

This is a similar situation to Relief Request No. 1. Check Valves CS-328L1, CS-328L4 and CS-325 are located on the charging lines to the RCS System. These valves must be disassembled and temporarily modified to block them closed in order to perform the required hydrostatic tests and plant personnel will be exposed to high radiation and radioactive contamination during the modification.

We believe this to be a reasonable code relief request since the proposed test pressure is, in fact, higher than 2235 psig nominal operating pressure in the sections of piping between 23 to 115 feet long for which the relief is requested.

3. CVCS - Reactor Letdown and Charging, Flow Diagram 1-5129

Piping Boundaries:

Letdown Lines:

Valves QRV-112, QRV-160, QRV-161, QRV-162

IST Code Class-2 Requirement:

For a design pressure of 2485 psig, Article IWC-5000 of Section XI code requires the above piping to be tested at a pressure of 3106 psig and temperature not less than 100°F.

Code Relief Request:

We request allowing the above section of piping to be tested at a pressure of 2280 psig at a temperature above 100°F during Mode 3 using RCS pressure. Valves QRV-111 and QRV-112 will be opened with QRV-160, QRV-161 and QRV-162 closed.

Basis for Relief Request:

The above section of piping cannot be tested at a pressure of 3106 psig without using a spare 1-inch plugged connection located downstream of instrument QTA-160. This section of piping is located inside the regenerative heat exchanger room which is normally a high radiation area. Therefore, plant personnel will be subject to substantial radiation exposure in order to perform the test.

[illegible]

1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator, who is usually a member of the research team. The investigator will identify the problem by looking at the data and trying to find out what is going on.

[illegible]

On 10/10/77, the subject was interviewed by the FBI. The subject stated that he was born on 10/10/77, and that he was currently residing at 1010 10th Street, New York, New York. The subject stated that he was currently unemployed, and that he was currently living with his mother. The subject stated that he was currently attending school at the New York City High School. The subject stated that he was currently living with his mother, and that he was currently attending school at the New York City High School. The subject stated that he was currently living with his mother, and that he was currently attending school at the New York City High School.

[illegible]

1. The first group of people who are interested in the study of the history of the United States are the people who are interested in the history of the United States.

4. 10. 1954

1. The first group of people who are interested in the study of the history of the United States are the people who are interested in the history of the United States.

[illegible]

• 1997 •

1. 1990年12月，在《中国环境报》上，刊登了“中国环境状况令人堪忧”的文章，指出中国环境状况令人堪忧，并呼吁全社会关注环境问题。

*(continued)*

5. The Commission has not received any information from the Government of the Republic of the Philippines regarding the activities of the Communist Party of the Philippines (CPP) in the Philippines, or the activities of the CPP in the United States.

1. The first group of people who are interested in the study of the history of the United States are the people who are interested in the history of the United States. This group of people is interested in the history of the United States because they want to know more about the United States. They want to know more about the United States because they want to know more about the United States.

1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is responsible for the study. The investigator must first identify the problem that is being studied. This is done by the investigator who is responsible for the study. The investigator must first identify the problem that is being studied. This is done by the investigator who is responsible for the study.



As an alternative, extending the test boundary to QCR-301 was considered. This would involve using QPX-301 located on the downstream piping outside the regenerative heat exchanger room as a test connection. This consideration was also rejected because valve QCR-301 and the flange bolted to the inlet flange of safety valve SV-51 are 600lb. class which cannot withstand the above test pressure.

We believe this to be a reasonable code relief request since the proposed test pressure is, in fact, higher than 2235 psig nominal operating pressure in the sections of piping approximately 65 feet long for which relief is requested.

4. Emergency Core Cooling System (SIS), Drawing 1-5142

Piping Boundaries:

Valves IMO-51, SI-142L1 - Boron Injection Loop No. 1  
Valves IMO-52, SI-142L2 - Boron Injection Loop No. 2  
Valves IMO-53, SI-142L3 - Boron Injection Loop No. 3  
Valves IMO-54, SI-142L4 - Boron Injection Loop No. 4

ISI Code Class 1 Requirement:

For an operating pressure of 2235 psig, Article IWB-5000 of the ASME Code, Section XI, requires that the piping be tested at a pressure of 2458 psig and a temperature not less than 100°F.


Code Relief Request:

We propose testing the above sections of piping at a pressure of 2280 psig and a temperature above 100°F. The test will be performed during Mode 3 with the RCS pressure at 2280 psig and temperature greater than or equal to 500°F. The RCS pressure will be used to block check valves SI-142L1 thru L4 closed, therefore limiting maximum pressure 2280 psig.

Basis for Relief Request:

This is a similar situation to code relief request No. 1. The sections of the piping system upstream of check valves SI-142L1 thru L4 cannot be tested at a pressure of 2458 psig without making temporary modifications (blocking the valve disc) to keep the check valves closed. Since the piping sections are part of the primary system, plant personnel will be subjected to substantial radiation exposure and contamination in order to carry out such modifications for the test.

We believe that this is a reasonable code relief request since the proposed test pressure is in fact higher than the 2235 psig nominal operating pressure in the sections of piping, each approximately 44 to 55 feet long, for which code relief is requested.



1. *Pharmaceutical industry* – The pharmaceutical industry is a major player in the healthcare sector, responsible for the development, production, and distribution of drugs. It is a highly regulated industry with significant research and development costs. The industry is often criticized for high drug prices and for prioritizing profit over patient care.

2. *Healthcare providers* – Healthcare providers, including hospitals, clinics, and individual practitioners, are the primary users of pharmaceuticals. They are responsible for diagnosing patients, prescribing medications, and monitoring their effectiveness. Healthcare providers often face pressure from payers (insurance companies and government) to control costs, which can impact their ability to prescribe the most effective treatments.

3. *Payors* – Payors, including insurance companies and government agencies (like Medicare and Medicaid), are responsible for paying for healthcare services. They have a strong interest in controlling costs and often negotiate with pharmaceutical companies to secure discounts or favorable payment terms.

4. *Patients* – Patients are the ultimate recipients of healthcare services. They have a right to access safe and effective medications at reasonable costs. Patient advocacy groups often play a role in influencing policy and holding the industry accountable.

5. *Regulators* – Regulatory bodies, such as the Food and Drug Administration (FDA) in the United States, are responsible for ensuring the safety, efficacy, and quality of pharmaceuticals. They oversee the drug approval process and enforce regulations on manufacturing and marketing practices.

6. *Pharmaceutical distributors* – Distributors are responsible for getting drugs from manufacturers to healthcare providers. They often have significant market power and can influence which drugs are stocked in pharmacies and hospitals.

7. *Pharmaceutical manufacturers* – Manufacturers are the companies that actually produce the drugs. They are responsible for the quality and safety of the manufacturing process and for providing accurate information about their products.

8. *Pharmaceutical sales and marketing* – Sales and marketing departments are responsible for promoting their products to healthcare providers. They often use a variety of tactics, including direct sales, detailing, and promotional programs, to influence prescribing behavior.

9. *Pharmaceutical research and development* – Research and development is the process of discovering new drugs and improving existing ones. It is a highly innovative and costly process that is essential for the advancement of medicine.

10. *Pharmaceutical industry associations* – Industry associations, such as the Pharmaceutical Research and Manufacturers of America (PhRMA), represent the interests of the pharmaceutical industry at the policy level. They often lobby on behalf of their members and provide information to policymakers.

11. *Pharmaceutical industry analysts* – Analysts, including those from investment firms and research organizations, provide insights into the pharmaceutical industry's financial performance, market trends, and competitive landscape.

12. *Pharmaceutical industry lawyers* – Lawyers provide legal counsel to pharmaceutical companies, helping them navigate the complex regulatory environment and manage legal risks.

13. *Pharmaceutical industry accountants* – Accountants are responsible for managing the financial affairs of pharmaceutical companies, including budgeting, financial reporting, and tax compliance.

14. *Pharmaceutical industry HR professionals* – HR professionals manage the human resources of pharmaceutical companies, including recruitment, training, and employee relations.

15. *Pharmaceutical industry IT professionals* – IT professionals manage the technology infrastructure of pharmaceutical companies, including data management, cybersecurity, and software development.

16. *Pharmaceutical industry environmental professionals* – Environmental professionals manage the environmental impact of pharmaceutical companies, including waste management, emissions control, and sustainability initiatives.

17. *Pharmaceutical industry ethics professionals* – Ethics professionals help pharmaceutical companies navigate ethical challenges, such as conflicts of interest, bribery, and data privacy.

18. *Pharmaceutical industry compliance professionals* – Compliance professionals ensure that pharmaceutical companies adhere to applicable laws and regulations, including those related to anti-bribery, anti-corruption, and data protection.

19. *Pharmaceutical industry quality management professionals* – Quality management professionals ensure that pharmaceutical companies maintain high standards of product quality and manufacturing processes.

20. *Pharmaceutical industry regulatory affairs professionals* – Regulatory affairs professionals manage the relationship between pharmaceutical companies and regulatory agencies, ensuring that products are properly approved and marketed.

21. *Pharmaceutical industry medical affairs professionals* – Medical affairs professionals manage the relationship between pharmaceutical companies and healthcare providers, providing medical information and supporting clinical research.

22. *Pharmaceutical industry sales and marketing professionals* – Sales and marketing professionals are responsible for promoting pharmaceutical products to healthcare providers and other stakeholders.

23. *Pharmaceutical industry finance professionals* – Finance professionals manage the financial aspects of pharmaceutical companies, including budgeting, financial reporting, and capital management.

24. *Pharmaceutical industry legal professionals* – Legal professionals provide legal counsel to pharmaceutical companies, helping them navigate the complex regulatory environment and manage legal risks.

25. *Pharmaceutical industry HR professionals* – HR professionals manage the human resources of pharmaceutical companies, including recruitment, training, and employee relations.

26. *Pharmaceutical industry IT professionals* – IT professionals manage the technology infrastructure of pharmaceutical companies, including data management, cybersecurity, and software development.

27. *Pharmaceutical industry environmental professionals* – Environmental professionals manage the environmental impact of pharmaceutical companies, including waste management, emissions control, and sustainability initiatives.

28. *Pharmaceutical industry ethics professionals* – Ethics professionals help pharmaceutical companies navigate ethical challenges, such as conflicts of interest, bribery, and data privacy.

29. *Pharmaceutical industry compliance professionals* – Compliance professionals ensure that pharmaceutical companies adhere to applicable laws and regulations, including those related to anti-bribery, anti-corruption, and data protection.

30. *Pharmaceutical industry quality management professionals* – Quality management professionals ensure that pharmaceutical companies maintain high standards of product quality and manufacturing processes.

31. *Pharmaceutical industry regulatory affairs professionals* – Regulatory affairs professionals manage the relationship between pharmaceutical companies and regulatory agencies, ensuring that products are properly approved and marketed.

32. *Pharmaceutical industry medical affairs professionals* – Medical affairs professionals manage the relationship between pharmaceutical companies and healthcare providers, providing medical information and supporting clinical research.

33. *Pharmaceutical industry sales and marketing professionals* – Sales and marketing professionals are responsible for promoting pharmaceutical products to healthcare providers and other stakeholders.

34. *Pharmaceutical industry finance professionals* – Finance professionals manage the financial aspects of pharmaceutical companies, including budgeting, financial reporting, and capital management.

35. *Pharmaceutical industry legal professionals* – Legal professionals provide legal counsel to pharmaceutical companies, helping them navigate the complex regulatory environment and manage legal risks.

36. *Pharmaceutical industry HR professionals* – HR professionals manage the human resources of pharmaceutical companies, including recruitment, training, and employee relations.

37. *Pharmaceutical industry IT professionals* – IT professionals manage the technology infrastructure of pharmaceutical companies, including data management, cybersecurity, and software development.

38. *Pharmaceutical industry environmental professionals* – Environmental professionals manage the environmental impact of pharmaceutical companies, including waste management, emissions control, and sustainability initiatives.

39. *Pharmaceutical industry ethics professionals* – Ethics professionals help pharmaceutical companies navigate ethical challenges, such as conflicts of interest, bribery, and data privacy.

40. *Pharmaceutical industry compliance professionals* – Compliance professionals ensure that pharmaceutical companies adhere to applicable laws and regulations, including those related to anti-bribery, anti-corruption, and data protection.

41. *Pharmaceutical industry quality management professionals* – Quality management professionals ensure that pharmaceutical companies maintain high standards of product quality and manufacturing processes.

42. *Pharmaceutical industry regulatory affairs professionals* – Regulatory affairs professionals manage the relationship between pharmaceutical companies and regulatory agencies, ensuring that products are properly approved and marketed.

43. *Pharmaceutical industry medical affairs professionals* – Medical affairs professionals manage the relationship between pharmaceutical companies and healthcare providers, providing medical information and supporting clinical research.

44. *Pharmaceutical industry sales and marketing professionals* – Sales and marketing professionals are responsible for promoting pharmaceutical products to healthcare providers and other stakeholders.

45. *Pharmaceutical industry finance professionals* – Finance professionals manage the financial aspects of pharmaceutical companies, including budgeting, financial reporting, and capital management.

46. *Pharmaceutical industry legal professionals* – Legal professionals provide legal counsel to pharmaceutical companies, helping them navigate the complex regulatory environment and manage legal risks.

47. *Pharmaceutical industry HR professionals* – HR professionals manage the human resources of pharmaceutical companies, including recruitment, training, and employee relations.

48. *Pharmaceutical industry IT professionals* – IT professionals manage the technology infrastructure of pharmaceutical companies, including data management, cybersecurity, and software development.

49. *Pharmaceutical industry environmental professionals* – Environmental professionals manage the environmental impact of pharmaceutical companies, including waste management, emissions control, and sustainability initiatives.

50. *Pharmaceutical industry ethics professionals* – Ethics professionals help pharmaceutical companies navigate ethical challenges, such as conflicts of interest, bribery, and data privacy.

51. *Pharmaceutical industry compliance professionals* – Compliance professionals ensure that pharmaceutical companies adhere to applicable laws and regulations, including those related to anti-bribery, anti-corruption, and data protection.

52. *Pharmaceutical industry quality management professionals* – Quality management professionals ensure that pharmaceutical companies maintain high standards of product quality and manufacturing processes.

53. *Pharmaceutical industry regulatory affairs professionals* – Regulatory affairs professionals manage the relationship between pharmaceutical companies and regulatory agencies, ensuring that products are properly approved and marketed.

54. *Pharmaceutical industry medical affairs professionals* – Medical affairs professionals manage the relationship between pharmaceutical companies and healthcare providers, providing medical information and supporting clinical research.

55. *Pharmaceutical industry sales and marketing professionals* – Sales and marketing professionals are responsible for promoting pharmaceutical products to healthcare providers and other stakeholders.

56. *Pharmaceutical industry finance professionals* – Finance professionals manage the financial aspects of pharmaceutical companies, including budgeting, financial reporting, and capital management.

57. *Pharmaceutical industry legal professionals* – Legal professionals provide legal counsel to pharmaceutical companies, helping them navigate the complex regulatory environment and manage legal risks.

58. *Pharmaceutical industry HR professionals* – HR professionals manage the human resources of pharmaceutical companies, including recruitment, training, and employee relations.

59. *Pharmaceutical industry IT professionals* – IT professionals manage the technology infrastructure of pharmaceutical companies, including data management, cybersecurity, and software development.

60. *Pharmaceutical industry environmental professionals* – Environmental professionals manage the environmental impact of pharmaceutical companies, including waste management, emissions control, and sustainability initiatives.

61. *Pharmaceutical industry ethics professionals* – Ethics professionals help pharmaceutical companies navigate ethical challenges, such as conflicts of interest, bribery, and data privacy.

62. *Pharmaceutical industry compliance professionals* – Compliance professionals ensure that pharmaceutical companies adhere to applicable laws and regulations, including those related to anti-bribery, anti-corruption, and data protection.

63. *Pharmaceutical industry quality management professionals* – Quality management professionals ensure that pharmaceutical companies maintain high standards of product quality and manufacturing processes.

64. *Pharmaceutical industry regulatory affairs professionals* – Regulatory affairs professionals manage the relationship between pharmaceutical companies and regulatory agencies, ensuring that products are properly approved and marketed.

65. *Pharmaceutical industry medical affairs professionals* – Medical affairs professionals manage the relationship between pharmaceutical companies and healthcare providers, providing medical information and supporting clinical research.

66. *Pharmaceutical industry sales and marketing professionals* – Sales and marketing professionals are responsible for promoting pharmaceutical products to healthcare providers and other stakeholders.

67. *Pharmaceutical industry finance professionals* – Finance professionals manage the financial aspects of pharmaceutical companies, including budgeting, financial reporting, and capital management.

68. *Pharmaceutical industry legal professionals* – Legal professionals provide legal counsel to pharmaceutical companies, helping them navigate the complex regulatory environment and manage legal risks.

69. *Pharmaceutical industry HR professionals* – HR professionals manage the human resources of pharmaceutical companies, including recruitment, training, and employee relations.

70. *Pharmaceutical industry IT professionals* – IT professionals manage the technology infrastructure of pharmaceutical companies, including data management, cybersecurity, and software development.

71. *Pharmaceutical industry environmental professionals* – Environmental professionals manage the environmental impact of pharmaceutical companies, including waste management, emissions control, and sustainability initiatives.

72. *Pharmaceutical industry ethics professionals* – Ethics professionals help pharmaceutical companies navigate ethical challenges, such as conflicts of interest, bribery, and data privacy.

73. *Pharmaceutical industry compliance professionals* – Compliance professionals ensure that pharmaceutical companies adhere to applicable laws and regulations, including those related to anti-bribery, anti-corruption, and data protection.

74. *Pharmaceutical industry quality management professionals* – Quality management professionals ensure that pharmaceutical companies maintain high standards of product quality and manufacturing processes.

75. *Pharmaceutical industry regulatory affairs professionals* – Regulatory affairs professionals manage the relationship between pharmaceutical companies and regulatory agencies, ensuring that products are properly approved and marketed.

76. *Pharmaceutical industry medical affairs professionals* – Medical affairs professionals manage the relationship between pharmaceutical companies and healthcare providers, providing medical information and supporting clinical research.

77. *Pharmaceutical industry sales and marketing professionals* – Sales and marketing professionals are responsible for promoting pharmaceutical products to healthcare providers and other stakeholders.

78. *Pharmaceutical industry finance professionals* – Finance professionals manage the financial aspects of pharmaceutical companies, including budgeting, financial reporting, and capital management.

79. *Pharmaceutical industry legal professionals* – Legal professionals provide legal counsel to pharmaceutical companies, helping them navigate the complex regulatory environment and manage legal risks.

80. *Pharmaceutical industry HR professionals* – HR professionals manage the human resources of pharmaceutical companies, including recruitment, training, and employee relations.

81. *Pharmaceutical industry IT professionals* – IT professionals manage the technology infrastructure of pharmaceutical companies, including data management, cybersecurity, and software development.

1. The first step in the process is to identify the problem. This involves gathering information about the situation and understanding the needs of the stakeholders involved.

1952年1月1日 星期日

[illegible]

the 1990s, the number of people in the world who are under 15 years of age is expected to increase from 1.1 billion to 1.5 billion. The number of people aged 65 and over is expected to increase from 200 million to 400 million. The number of people aged 15 and over is expected to increase from 3.5 billion to 4.5 billion. The number of people aged 15 and over is expected to increase from 3.5 billion to 4.5 billion. The number of people aged 15 and over is expected to increase from 3.5 billion to 4.5 billion.

1. *Pharmaceutical industry*—The pharmaceutical industry is a major contributor to the U.S. economy, with sales of over \$100 billion in 1997. The industry is characterized by high research and development costs, long time to market, and high barriers to entry. The industry is also characterized by a high degree of concentration, with a few large firms dominating the market.

[illegible][illegible]

Attachment to this letter contains the following flow diagrams:

- 1) Dwg. No. 1-5142-29, "Emergency Core Cooling (RHR)",  
Unit No. 1.
- 2) Dwg. No. 1-5129-27, "CVCS - Reactor Letdown and Charging".
- 3) Dwg. No. 1-5142-25, "Emergency Core Cooling (SIS),  
Unit No. 1.

Unit No. 1 of the Donald C. Cook Nuclear Plant is undergoing the 10 year refueling outage and we plan to test items 2 and 4 noted above during the plant heatup. Items 1 and 3 were tested during the unit cooldown per the criterion noted above. We are requesting the relief because the above noted piping systems can not be tested to ASME Code requirements without modifying the Systems and/or exposing personnel to unnecessary radiation hazards. In order to avoid unnecessary delays and to restore the unit to power on time as scheduled we are requesting a response from the NRC by July 15, 1985. If you have any questions or concerns about the material contained herein, please do not hesitate to call us.

Although these code relief requests have been reviewed by appropriate technical and managerial personal at both AEPSC and the Plant, this document has not yet been reviewed in concert by either our Plant or Corporate Safety Committees, but is scheduled to be reviewed by both bodies shortly. If those reviews result in any changes, we will notify you accordingly.

A check in the amount of \$150.00 is attached with this letter for the NRC processing of the aforementioned requests.

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

RBK  
5/17/85

cm

Attachments

cc: John E. Dolan (w/o attachments)  
W. G. Smith, Jr. - Bridgman (w/attachments)  
R. C. Callen (w/o attachments)  
G. Bruchmann (w/o attachments)  
G. Charnoff (w/o attachments)  
NRC Resident Inspector - Bridgman (w/attachments)

