

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

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May 31, 1985
AEP:NRC:0847E

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
QUALITY ASSURANCE PROGRAM; REVIEW OF
CONDITION REPORTS

Mr. James G. Keppler, Regional Administrator
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter constitutes a request for change to the Updated Final Safety Analysis Report (FSAR) for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2. Specifically, it addresses a proposed change to Section 1.7, "Quality Assurance" relative to reviews of Condition Reports performed by the Plant Nuclear Safety Review Committee, the AEPSC Nuclear Operations Division and the Nuclear Safety and Design Review Committee.

This request is submitted to you in accordance with 10 CFR 50.54 because it may be perceived as a reduction in commitment. The revised program, as described in Attachment 1, will continue to satisfy the criteria of 10 CFR 50, Appendix B and provide for prompt attention to conditions adverse to safety by our plant and corporate safety review committees.

The present wording of the FSAR is provided in Attachment No. 2, and the proposed changes are provided in Attachment No. 3.

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
M. P. Alexich
Vice President 5/31/85

8508020274 850730
PDR - ADCK 05000315
PDR

MPA/rn

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

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Attachment No. 1 to AEP:NRC:0847E

Justification for the Proposed Changes

Background

The present wording of FSAR section 1.7.16.2.2 requires Plant Nuclear Safety Review Committee (PNSRC) review of the investigation and closeout of all Condition Reports that are generated, as well as independent evaluation by the AEPSC Nuclear Operations Division and the Nuclear Safety and Design Review Committee (NSDRC). As originally conceived and practiced, Condition Reports were limited primarily to events and circumstances involving safety-related equipment, systems, or events. Additionally, the D. C. Cook Technical Specifications (Section 6.5.1.6) require the PNSRC to review only those Condition Reports dealing with Technical Specification violations.

The number of Condition Reports generated in 1981 amounted to approximately 500 and averaged 415 per year for the period 1975-1981. In 1982 the Plant informally extended the applicability of Condition Reports to include any abnormal condition, whether safety-related or not. This has created a situation in which the PNSRC and NSDRC are required to dedicate an inordinate amount of time to reviewing these reports. In 1984 alone approximately 2700 were generated, the preponderance of which did not represent credible risks to public health and safety.

Proposal

We propose to modify the FSAR Section 1.7.16.2.2 to allow review of the investigation and closeout actions on Condition Reports by management other than the PNSRC. Should this review determine potential Technical Specification violations or adverse implications for public health and safety, the report will be forwarded to the PNSRC for their review. Only those Condition Reports reviewed by the PNSRC will be forwarded to the AEPSC Nuclear Operations Division and the NSDRC for an independent evaluation of the reported condition. QA review and audit oversight will be applied to ensure that this differentiation is being correctly applied. This change will help to ensure that those Condition Reports which legitimately require PNSRC and NSDRC review receive adequate attention.

THE
FEDERAL
BUREAU OF
INVESTIGATION
OF THE
DEPARTMENT OF JUSTICE
WASHINGTON, D. C.
20535

TO : DIRECTOR, FBI
FROM : SAC, NEW YORK
SUBJECT: [Illegible]

Attachment 2 to AEP:NRC:0847E

Present Wording of FSAR Section 1.7.16.2.2

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- b) In accordance with established procedures for Condition Reports, Nonconformance Reports, Inspection Reports, and Audit Reports.
- c) As required by NRC Letters, I.E. Bulletins, and Inspection Reports.
- d) As required by 10CFR, Part 21 identified deficiencies.

Corrective measures include both corrective and preventive actions.

1.7.16.2.2

Condition Reports provide the mechanism for plant personnel to notify management of conditions adverse to quality. Investigations of reported conditions adverse to quality are assigned by management. The investigation report is used to identify the need for changes to instructions or procedures, the initiation of a design change to correct system or equipment deficiencies, or the initiation of job orders to correct minor deficiencies. Further, Condition Reports are used to identify those actions necessary to prevent recurrence of the reported condition. Condition Reports are also used to report violations to codes, regulations, and the Technical Specifications. Condition Reports are reviewed by the PNSRC for evaluation of actions taken to correct the deficiency and prevent repetition.

The AEPSC Nuclear Engineering Division and the Nuclear Safety and Design Review Committee (NSDRC) receive Condition Reports for an independent evaluation of the reported condition.

1.7.17 QUALITY ASSURANCE RECORDS

1.7.17.1 POLICY

Records that furnish evidence of activities affecting the quality of safety related structure, systems, and components are maintained.

Attachment 3 to AEP:NRC:0847E

Proposed Wording of FSAR Section 1.7.16.2.2

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540 EAST 57TH STREET
CHICAGO, ILL. 60637
TEL. 733-4331

- b) In accordance with established procedures for Condition Reports, Nonconformance Reports, Inspection Reports, and Audit Reports.
- c) As required by NRC Letters, I.E. Bulletins, and Inspection Reports.
- d) As required by 10 CFR, Part 21 identified deficiencies.

Corrective measures include both corrective and preventive actions.

1.7.16.2.2

Condition reports provide the mechanism for plant personnel to notify management of conditions adverse to quality. Investigations of reported conditions adverse to quality are assigned by management. The investigation report is used to identify the need for changes to instructions or procedures, the initiation of design changes or job orders to correct system or equipment deficiencies, or other appropriate corrective and preventive actions. Condition Reports are also used to report violations to codes, regulations, and the Technical Specifications. Condition Reports will be reviewed by the appropriate level of management personnel to assure that adequate corrective and/or preventive action has been taken. If their review should identify conditions involving Technical Specification violations, or which could have adverse implications for public health and safety, the report will be forwarded to the PNSRC for review.

The AEPSC Nuclear Operations Division and the Nuclear Safety and Design Review Committee (NSDRC) receive those Condition Reports reviewed by the PNSRC for an independent evaluation of the reported condition.

1.7.17 QUALITY ASSURANCE RECORDS

1.7.17.1 POLICY

Records that furnish evidence of activities affecting the quality of safety related structures, systems, and components are maintained.

[illegible]

July 30, 1985

DISTRIBUTION

~~Docket File~~ w/o encl.
ORB#1 Rdg w/o encl.
CParrish w/encl.
DWigginton w/encl.
Gray File w/encl.

DOCKET NO(S). 50-315

Mr. John Dolan, Vice President
Indiana and Michigan Electric Company
c/o American Electric Power
Service Corporation
1 Riverside Plaza
Columbus, Ohio 43216

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNIT NO. 1

The following documents concerning our review of the subject facility are transmitted for your information.

- ☐ Notice of Receipt of Application, dated _____.
- ☐ Draft/Final Environmental Statment, dated _____.
- ☐ Notice of Availability of Draft/Final Environmental Statement, dated _____.
- ☐ Safety Evaluation Report, or Supplement No. _____, dated _____.
- ☐ Notice of Hearing on Application for Construction Permit, dated _____.
- ☐ Notice of Consideration of Issuance of Facility Operating License, dated _____.
- ☐ Monthly Notice; Applications and Amendments to Operating Licenses Involving no Significant Hazards Considerations, dated _____.
- ☐ Application and Safety Analysis Report, Volume _____.
- ☐ Amendment No. _____ to Application/SAR dated _____.
- ☐ Construction Permit No. CPPR- _____, Amendment No. _____ dated _____.
- ☐ Facility Operating License No. _____, Amendment No. _____, dated _____.
- ☐ Order Extending Construction Completion Date, dated _____.
- ☒ Other (Specify) Dated July 31, 1985 RE: Individual Notice for Proposed Amendments

relating to the installation and calibration of new temperature sensors.

A complete package is also enclosed.

Division of Licensing, ORB#1
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc:

OFFICE	ORB#1:DL						
SURNAME	CParrish,ps						
DATE	7/30/85						

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UNITED STATES NUCLEAR REGULATORY COMMISSIONINDIANA AND MICHIGAN ELECTRIC COMPANYDOCKET NO. 50-315NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT TO
FACILITY OPERATING LICENSE AND PROPOSED NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION AND OPPORTUNITY FOR HEARING

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of amendment to Facility Operating License No. DPR-58, issued to Indiana and Michigan Electric Company (the licensee), for operation of the Donald C. Cook Nuclear Plant, Unit No. 1 located in Berrien County, Michigan.

By letter dated July 30, 1985, the licensee submitted an application to amend the D. C. Cook Unit No. 1 Technical Specifications to reflect revised setpoints in the channels for overpower delta T, overtemperature delta T, and loss of flow trips and the reactor coolant temperature to protect against departure from nucleate boiling (DNB). The current Technical Specifications reflect setpoints and temperature readings which account for specific temperature sensor uncertainty limits. The licensee is replacing temperature sensors with sensors fully qualified for the expected environmental conditions. However, in reviewing the calibration procedures used by the vendor, it was discovered that a somewhat larger calibration band existed than for the replaced unqualified sensors. This somewhat larger calibration error band was discovered after purchase and the initiation of installation. Resetting the allowable values in the Technical Specifications to accommodate the somewhat larger calibration band assures that the same safety margins exist as before, and that the existing safety

analyses for the D. C. Cook Unit No. 1 remain valid and unchanged. The licensee also proposes to modify the Technical Specifications to allow for a continued orderly startup after each refueling following the cross calibration of the new temperature sensors so that rod drop tests and hot zero power physics tests could be performed in mode 3 while awaiting the results of the cross calibration analysis. These changes to the Technical Specifications would revise the notes on the engineered safety features (ESF) actuations to require the channels for low-low- T_{avg} to be placed in the tripped condition until the corrected value for T_{avg} could be imposed for ESF actuations before proceeding to mode 2. With these channels in the tripped condition in mode 3 at the beginning of life for the core, the existing safety analysis remains valid.

Before issuance of the proposed license amendment, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations. The Commission has made a proposed determination that the amendment request involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The proposal revision dated July 30, 1985 does not contain the specific revised set points values to be incorporated in the Technical Specifications. The technical staff of the licensee is presently determining the correct value and will submit the value for NRC review and

approval before final action on this amendment is taken. The proposed revision in setpoints and allowable values due to the greater uncertainties with the new temperature sensors will be reflected in instrumentation corrections without any changes to previous accident analyses. These changes would represent a departure from current practices but recognize the inherent differences between the old and new temperature sensors. The change to allow rod drop tests and hot zero power physics tests in mode 3 with the low-low T_{avg} channels in the tripped position will insure that the existing safety analyses remain valid for the D. C. Cook Unit No. 1. The channels in the tripped condition are not expected to influence operation in mode 3 at startup because the protection to be afforded is to account for a main steam line break. In this mode at startup, there is little or no steam produced to be of concern. No other accidents should be created by the proposed changes and all safety levels are maintained and not reduced. The specific values for setpoints and temperatures will be provided by the licensee about August 8, 1985.

The Commission has determined that failure to act in a timely way would result in the licensee not starting up the plant on the now scheduled date of August 10, 1985 and reaching mode 3 on August 18, 1985.

Therefore, the Commission has insufficient time to issue its usual 30-day notice of the proposed action for public comment.

If the proposed determination becomes final, an opportunity for a hearing will be published in the Federal Register at a later date and any hearing request will not delay the effective date of the amendment.

If the Commission decides in its final determination that the amendment does involve significant hazards consideration, a notice of opportunity for

a prior hearing will be published in the Federal Register and, if a hearing is granted it will be held before any amendment is issued.

The Commission is seeking public comments on this proposed determination of no significant hazards consideration. Comments on the proposed determination may be telephoned to Steven A. Varga, Chief of Operating Reactors Branch No. 1, by collect call to 301-492-8035 or submitted in writing to the Secretary of the Commission, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, ATTN: Docketing and Service Branch. All comments received by August 16, 1985, 4:30 p.m., will be considered in reaching a final determination. A copy of the application may be examined at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and the Maude Reston Palenske Memorial Library, 500 Market Street, St. Joseph, Michigan 49085.

Dated at Bethesda, Maryland, this 31st day of July 1985.

FOR THE NUCLEAR REGULATORY COMMISSION

Joseph D. Neighbors, Acting Branch Chief
Operating Reactors Branch #1
Division of Licensing

*SEE PREVIOUS WHITE FOR CONCURRENCE

ORB#1:DL*
CParrish
7/30/85

ORB#1:DL
DWigginton
7/31/85

ORB#1:DL*
SVarga
7/31/85

OELD
7/ /85

*Telecon concurrence on 7/31
from Smith - Comments
have been incorporated.*

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It is a good idea to get your car checked out by a professional mechanic before you start your trip. This will help you avoid any potential problems and ensure that your car is in good working order.

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was a 2005 PhD recipient from the University of Illinois at Chicago.

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Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains. The number of transformed cells was determined by the number of colonies obtained on the selective medium. The results are the mean of three independent experiments.

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Dated at Bethesda, Maryland, this 30 day of July 1985.

FOR THE NUCLEAR REGULATORY COMMISSION

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

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1. The first part of the report is a general
description of the project and its objectives.
2. The second part is a detailed description of the
methodology used in the study.

3. The third part is a description of the results of the study.

4. The fourth part is a discussion of the results.

5. The fifth part is a conclusion.
6. The sixth part is a list of references.