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 AUTH. NAME AUTHOR AFFILIATION
 ALEXICH, M. P. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Forwards reactor vessel level instrumentation sys (RVLIS)
 implementation ltr rept, per commitment to provide rept
 approx 4 months following 1985 Unit 2 refueling outage.
 RVLIS completely installed, calibr, tested & functional.

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 TITLE: DR Submittal: Inadequate Core Cooling (Item II.F.2) GL 82-28

NOTES:

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Source	Information	Analysis	Evaluation
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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

November 20, 1986
AEP:NRC:0761F

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,
RVLIS IMPLEMENTATION CONFIRMATION

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

Dear Mr. Denton:

The purpose of this letter and its attachment is to provide the Reactor Vessel Level Instrumentation System (RVLIS) implementation letter report. By transmittal of this report, we are fulfilling our commitment, made in AEP:NRC:0761D, to provide an implementation letter report approximately four months following the end of the 1985 Unit 2 refueling outage (which had to be delayed until 1986 and hence is now referred to as the 1986 refueling outage). RVLIS was completely installed, calibrated, and tested for both units following the above refueling outage. In design and performance, RVLIS is considered completely functional.

The RVLIS implementation letter report is provided as an attachment to this letter.

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. R. Alexich
Vice President

RBK
11/19/86

Attachment
MPA/cm

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 TO AEP:NRG:0761F
RVLIS IMPLEMENTATION LETTER REPORT

DONALD C. COOK NUCLEAR PLANT

In AEP:NRC:0761D, we agreed to address the implementation letter report in the following manner:

Item 1

"Notification that the system installation, functional testing, and calibration are complete and that test results are available for inspection."

Response:

For both Units 1 and 2, RVLIS was made functional, tested and calibrated as part of the 1986 Unit 2 refueling outage. The test results are available for inspection at the plant.

Item 2

"Summary of licensee conclusions based on test results, e.g.,
a) The system performs in accordance with design expectation and within design error tolerances; or
b) description of deviations from design performance specifications and basis for concluding that the deviations are acceptable."

Response:

The systems in both Units 1 and 2 perform in accordance with design expectation and within design error tolerances. Minor deviations were noted in 9 out of 141 test results. None of these 9 tolerance deviations are considered significant. In addition, Westinghouse has provided formal documentation supporting operability of the systems.

The out-of-tolerance test results are considered acceptable for a number of reasons. Three of the deviations were due to error in one indicator that was subsequently resolved by recalibration. The remaining deviations appear to be data logging input errors. This conclusion is supported by the identical values appearing in other test run results and the acceptable results obtained with similar input conditions on the other train or in the other unit.

Item 3

"Description of any deviations of the as-built system from previous design descriptions with any appropriate explanation."

Response:

The following modifications to the design conveyed to the NRC as of our April 2, 1985 submittal (AEP:NRC:0761D) have been completed and tested:

- 1) New wide-range pressure transmitters have been installed outside containment solely for RVLIS to provide the required accuracy under all anticipated environmental conditions. The transmitters which were connected to the level transmitter access assemblies are fully qualified and powered by Class 1E sources. Channel separation is provided.
- 2) As recommended by Westinghouse, two sensing capillary RTDs have been disconnected from the circuitry of each RVLIS to use more representative RTDs for measuring the temperature of the bottom sensing lines.
- 3) As recommended by Westinghouse, the capillary equalizing (bypass) valves were removed from the tubing manifolds of the level transmitters to eliminate their leakage as a source of level error.

Item 4

"Request for modification of Technical Specifications to include all ICC instrumentation for accident monitoring."

Response:

Our Technical Specification change requests concerning our Inadequate Core Cooling (ICC) Instrumentation were submitted in AEP:NRC:0856J, dated October 11, 1985.

Item 5

"Request for NRC approval of the plant specific installation."

Response:

RVLIS has been completely installed, calibrated, and tested for both units and is considered completely functional. NRC approval of the plant specific installation is requested.

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)."

Response:

Our EOPs were developed in accordance with the Westinghouse Owners Group Emergency Response Guidelines, which were approved by the NRC. Our Procedures Generation Package (PGP) was submitted in AEP:NRC:0773I, dated September 28, 1984. We received a draft Safety Evaluation Report (DSER) from the Commission by a letter dated September 12, 1985. We responded to the DSER in AEP:NRC:0773Q, dated May 16, 1986. Once we receive NRC approval of our PGP via a Final Safety Evaluation Report, this item will be considered complete.