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POWERS, R.P. Indiana Michigan Power Co.
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SUBJECT: Forwards results of independent chemical evaluations performed from Sept 1997 through Feb 1999, re resolution of issues related to license amend 227.

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April 22, 1999

AEP:NRC:1295B

Docket No. 50-315

U. S. Nuclear Regulatory Commission
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- Reference 1: Letter AEP:NRC:1295D from R. P. Powers to the Nuclear Regulatory Commission Dated February 20, 1999.
- Reference 2: Letter J. F. Stang to R.P. Powers, Donald C. Cook Nuclear Plant, Unit 1 - Issuance of Amendment RE: Steam Generator Surveillance Extension (TAC NO. MA3562) Dated December 30, 1998.

Donald C. Cook Nuclear Plant Unit 1
RESOLUTION OF ISSUES RELATED TO LICENSE AMENDMENT 227

On February 20, 1999, Indiana Michigan Power Company (I&M) informed the NRC (Reference 1) of our action placing the implementation of License Amendment 227, Deferral of Steam Generator Eddy Current Testing, on hold. The implementation of the amendment was delayed to resolve concerns related to adherence to Electric Power Research Institute (EPRI) chemistry guidelines while the steam generators were in wet lay-up.

An independent review of the chemistry conditions during the current unit 1 shutdown period found that while minor fluctuations in steam generator water chemistry occurred, adequate corrosion protection was maintained. When fluctuations were detected, chemistry parameters were restored to goal values in accordance with plant procedures and the EPRI guidelines. This conclusion was discussed with NRC management and staff on March 25, 1999 at D. C. Cook Nuclear Plant (CNP). Attachments 1 and 2 contain the results of the independent chemistry evaluations performed from September 1997 through February 1999. Additionally, attachment 1 contains recommendations by the independent evaluator. These recommendations have been entered into our corrective action program and will be dispositioned as part of the CNP restart.

As a result of the investigation of the original concern under the corrective action program, we have identified weaknesses in our submittal preparation and validation process as well as our own license amendment implementation process. Revision of the procedures that support the above processes is a priority. In the interim, we have instituted stringent controls on submittals

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of all types while we revise our procedures and retrain personnel.

License Amendment 227 was implemented on April 5, 1999.

If you have any further questions regarding this issue, please contact David F. Kunsemiller, Director Regulatory Affairs at 616-466-2405.

Sincerely,



R. P. Powers
Vice President

Attachments

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J. E. Dyer
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NRC Resident Inspector
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ATTACHMENT 1 TO AEP:NRC:1295B

UNIT 1 STEAM GENERATOR LAYUP CHEMISTRY OUT OF SPECIFICATION
DURING SEPTEMBER 24, 1997 TO DECEMBER 31, 1997