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 DENTON, H.R. Office of Nuclear Reactor Regulation

SUBJECT: Forwards response to NRC 790907 ltr requesting addl info for  
 IE Bulletins 79-06A & 79-06A, Revision 1. Discusses  
 surveillance procedure for locked safety-related valves &  
 procedures for dealing w/hydrogen gas within containment.

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October 11, 1979  
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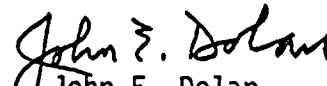
Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74

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

Dear Mr. Denton:

This letter is in response to Mr. A. Schwencer's letter of September 7, 1979 which requested additional information on IE Bulletins 79-06A and 79-06A, Revision 1. The attachment to this letter contains our responses for the items requested in the enclosure to Mr. Schwencer's letter and supplements our May 1, June 6 and 25, July 25 and September 17, 1979 letters to you.

Very truly yours,

  
John E. Dolan  
Vice President

JED:em

## Attachment

cc: R. C. Callen  
G. Charnoff  
R. S. Hunter  
R. W. Jurgensen  
D. V. Shaller - Bridgman  
P. D. O'Reilly - NRC

*Aug 11*

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ATTACHMENT

Response to NRC Request for Additional  
Information Regarding IE Bulletins  
79-06A and 79-06A, Revision 1.

Donald C. Cook Nuclear Plant  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74

Action Item 8:

"This Bulletin item requested that you review your plant procedures and revise them as necessary to ensure that locked safety-related valves are subjected to periodic surveillance. Confirm that you have complied with this request."

AEP Response:

The purpose of locks and seals is to maintain valves in the required position. Technical Specification surveillance item 4.5.2.6 says: "At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed or otherwise secured in position is in its correct position." We have been monitoring many of the positively controlled valves (locked, sealed or otherwise secured in position) within the normal 31 day surveillance of safety-related systems. This is done to verify operable flow paths as indicated in our previous response to this item.

However, in accordance with your requirement stated in the above action item, we are reviewing procedures, and revising them to include verification of the locked safety-related valve positions on a 31 day basis. Valves inside containment are excluded from this check. This procedure review and revisions will be completed by November 1, 1979.

Action Item 10:

(a) "Your response to this Bulletin item addressed Technical Specifications requirements instead of procedures. In addition, your response indicated that you may be relying on prior operability verification within the current Technical Specifications surveillance interval. It is our position that operability should be further verified by at least a visual check of the system status, to the extent practicable, before removing the redundant equipment from service. Provide your schedule for completing the review and modification of procedures to incorporate the requirements of this Bulletin item. Within two weeks after completion of this review, submit a summary of the results and the actions taken."

(b) "Extend the review and modification of procedures to include safety-related systems, as requested in this Bulletin item. Submit a summary of the results of your review and the actions taken."

AEP Response:

The reviews required by parts (a) and (b) of this action item have been completed and the results were previously submitted to you in responding to action items 8 and 10 of Bulletins 79-06A and 79-06A, Revision 1 (May 1 and July 25, 1979). The status of safety-related systems is a required check at the start of each shift. This is accomplished by a visual check of valve status lights, review of the Shift Supervisor's log and compliance with Technical Specification operability requirements. In this manner, when a piece of redundant equipment is removed from service during a shift, the operability status of its redundant counterpart is, as a minimum, verified at the start of that shift (See our response to Action Item 10 in our June 25, 1979 letter). Hence, the maximum amount of time that can elapse between the required status check of redundant components and removal of a redundant component from service is eight hours. We believe that this meets the intent of your position that operability of redundant components be verified before removing a redundant component from service. Also, our review of maintenance and test procedures included all safety-related systems as requested. Our procedures are written to assure compliance with Technical Specifications and include all safety-related systems. By procedure, when a piece of safety-related equipment is returned from maintenance, it is functionally tested and documented. This includes all safety-related pieces of equipment and meets the requirements of this Bulletin item. Thus, no further action is necessary.

Action Item 12:

"Confirm that your review of operating procedures for dealing with hydrogen gas in the containment was performed specifically to assure operability, maintainability, sampling, shielding, and accessibility of the hydrogen removal system. Provide your schedule for completing procedures which incorporate the various operating modes that can deal with hydrogen in the primary coolant system."

AEP Response:

Operating procedures for dealing with hydrogen gas in the containment were reviewed and covered operability, accessibility, shielding, maintainability and sampling. The results of this review indicated the following:

1. Containment Hydrogen Monitoring System (HMS)

The HMS has successfully completed all required pre-operational and Technical Specification testing performed to date. Access to the valve/pump controls during an accident is possible. In accordance with item 2.1.6.B of NUREG-0578, the shielding requirements for accessibility for operation and maintenance of the HMS under the radiation levels present following a TMI-2 type accident are being included in the shielding review.

2. Hydrogen Recombiners

The two redundant hydrogen recombiners have successfully completed all required pre-operational and Technical Specification testing performed to date. The hydrogen recombiners themselves are located inside containment. All active parts of the recombiners necessary for their operation, which may require maintenance are located outside containment and are accessible. All components outside containment are adequately shielded for operation and maintenance during normal or post-accident conditions. The hydrogen recombiners are being reviewed in accordance with item 2.1.5 of NUREG-0578.

3. Containment Hydrogen Skimmer Systems

The two redundant hydrogen skimmer trains have successfully completed all required pre-operational and Technical Specification testing performed to date. This in-containment system is being reviewed in accordance with item 2.1.5 of NUREG-0578.

Action Item 12 (continued)

AEP Response: (continued)

In response to the Bulletin concerns on hydrogen in the primary coolant system, we reviewed the various operating modes for removing hydrogen under a TMI-2 type accident. These modes would require resetting/bypassing containment isolation signals in order to place various systems into service. In accordance with item 2.1.4 of NUREG-0578, we are reviewing the isolation requirements for these systems. Procedures which incorporate modes of hydrogen removal will be reviewed/revised as necessary, to be consistent with the results of our review. Any new procedures will be put into effect if required.