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 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Provides addl info on significant hazards considerations for extension of surveillance interval for Cycle 6. Encl list of equipment & corresponding actuation confirms degradation not increased by proposed extension.

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December 19, 1985
AEP:NRC:0967A

Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316
License No. DPR-74
SURVEILLANCE INTERVAL EXTENSION FOR UNIT 2 CYCLE 6
ADDITIONAL INFORMATION ON SIGNIFICANT HAZARDS CONSIDERATIONS

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

Dear Mr. Denton:

Pursuant to the request of members of your staff, this letter provides additional information on the significant hazards considerations for our letter AEP:NRC:0967, dated December 13, 1985.

Although a number of 18-month surveillances will be delayed, we believe that this extension will not adversely affect the operability of the equipment involved. Our current surveillance programs will continue during the extension period. The operability of much of the affected equipment will be assured through the normal interim surveillances such as channel checks and channel functional tests. Many of our surveillances are more stringent than required by the Technical Specifications (T/Ss), most notably our channel functional tests, as described in the attachment. We believe these interim surveillances are sufficient to ensure operability of this equipment during the extension period.

In addition to our normal surveillance testing, some of the equipment experienced actuations, testing, or other verification of operability during the last 18 months. A list of the equipment and the corresponding actuation is given in the attachment to this letter. We believe this information further confirms that the probability of undetected degradation in performance of this equipment is not significantly increased by the surveillance extension.

A number of the surveillances involved pertain to equipment that serves a passive function. It is not possible to document the actuation of such systems. However, the passive nature of these systems is such that

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degradation is unlikely in the short time period of the extension. As a further measure to ensure operability of snubbers, we will perform a visual inspection at least once prior to shutdown on all accessible snubbers for which the surveillance is extended. Inaccessible snubbers cannot be inspected due to ALARA considerations.

Since there has been no change to our plant configuration and there are no known deficiencies in our systems, we feel there is no cause to believe that the consequences of any accident are increased or that an unreviewed safety question is introduced.

Based on the above, we believe that the surveillance extension requested will not involve a significant increase to the probability or consequences of a previously analyzed accident or introduce an unreviewed safety issue. Therefore, we believe that the changes proposed in our letter AEP:NRC:0967 do not involve a significant hazards consideration as defined by 10 CFR 50.92.

It is also noted in our letter AEP:NRC:0967 that the earliest date for a required surveillance for which we requested extension was January 30, 1986. That date should be corrected to January 29, 1986.

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 *qms*
Vice President *12/19/85*

cm

Attachment

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

1. The first part of the document is a letter from the President of the United States to the Congress, dated January 3, 1862. It is a very important document, as it contains the President's annual message to Congress. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

2. The second part of the document is a letter from the Secretary of the Treasury to the President, dated January 10, 1862. It is a very important document, as it contains the Secretary's report to the President on the state of the Treasury. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

3. The third part of the document is a letter from the Secretary of the Navy to the President, dated January 15, 1862. It is a very important document, as it contains the Secretary's report to the President on the state of the Navy. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

4. The fourth part of the document is a letter from the Secretary of the War to the President, dated January 20, 1862. It is a very important document, as it contains the Secretary's report to the President on the state of the War. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

5. The fifth part of the document is a letter from the Secretary of the Interior to the President, dated January 25, 1862. It is a very important document, as it contains the Secretary's report to the President on the state of the Interior. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

6. The sixth part of the document is a letter from the Secretary of the Agriculture to the President, dated January 30, 1862. It is a very important document, as it contains the Secretary's report to the President on the state of the Agriculture. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

7. The seventh part of the document is a letter from the Secretary of the Education to the President, dated February 5, 1862. It is a very important document, as it contains the Secretary's report to the President on the state of the Education. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

8. The eighth part of the document is a letter from the Secretary of the Commerce to the President, dated February 10, 1862. It is a very important document, as it contains the Secretary's report to the President on the state of the Commerce. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

9. The ninth part of the document is a letter from the Secretary of the Finance to the President, dated February 15, 1862. It is a very important document, as it contains the Secretary's report to the President on the state of the Finance. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

10. The tenth part of the document is a letter from the Secretary of the Public Works to the President, dated February 20, 1862. It is a very important document, as it contains the Secretary's report to the President on the state of the Public Works. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

The following actuations, tests, and other actions are presented here as further evidence to support our belief that the requested extension will not significantly increase the probability of an accident. Some of the following are examples demonstrating that systems have performed their design function during the past 18 months. Although these examples do not totally demonstrate all of the details of the 18-month surveillances, they do demonstrate that many of those features important to safety have been observed since the last 18-month surveillance. Others are actions taken which increase our confidence in the operability of the systems listed. It should be noted that prior to our startup from the steam generator forced outage in October, 1985, we performed a visual inspection of containment for cleanliness.

T/SActions Taken to Demonstrate Operability

4.3.1.1.1
4.3.1.1.2
4.3.1.1.3
4.3.2.1.1
4.3.2.1.2
4.3.2.1.3

The channel functional tests currently performed on this instrumentation are far more stringent than required. These tests not only demonstrate channel functionality but also verify calibration of trip setpoints, actuations, and alarms. We believe these monthly calibration checks will adequately ensure the operability of this instrumentation during the extension period.

In addition, the UVTAs and the shunt trip attachments passed tests for trip and breaker response time on November 6, 1985 and December 12, 1985, respectively.

The safety injection ESF was actuated by a low pressurizer pressure signal on November 11, 1984. This demonstrated both that the ESF functioned properly and that the valves were correctly aligned.

4.4.6.1.b

Surveillances required by current Technical Specifications give no indication of problems.

4.4.11.1.b

The PORVs were cycled during shutdown during September 1985, as part of our cooldown procedure.

Table 4.3-10
Item 13

The channel functional tests currently performed on this instrumentation are far more stringent than required. These tests not only demonstrate channel functionality but also verify calibration of trip setpoints, actuations, and alarms. We believe these monthly calibration checks will adequately ensure the operability of this instrumentation during the extension period.

4.6.5.9

The divider barrier seal is a passive system not subject to an active failure. The last test performed (on March 29, 1984) showed that the seal was in good condition and we see no reason to believe degradation has occurred.



4.7.9.2.b

Extension only applies to portions of systems inside containment. System is entirely passive and the brief extension should not lead to deterioration.

4.8.1.1.1

4.8.1.2

4.8.1.1.2

4.8.1.2

The Train AB and CD diesels were run and paralleled to the bus on November 17, 1985 and December 2, 1985, respectively.

4.8.2.3.2

4.8.2.4.2

The battery has been in continuous service with no indication of significant deterioration. Therefore, we have no reason to believe that extension of the 18-month surveillance for a brief period will adversely affect public health and safety.

4.7.7.1

We will visually inspect all accessible snubbers when the surveillance is due. Inaccessible snubbers cannot be inspected due to ALARA considerations.

4.5.2

ECCS throttle valves are locked in place since the last surveillance.

The safety injection ESF was actuated by a low pressurizer pressure signal on November 11, 1984. This demonstrated both that the ESF functioned properly and that the valves were correctly aligned.

4.5.3.1

ECCS subsystem throttle valves are locked in place since the last surveillance.



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