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SUBJECT: Responds to NRC Generic Ltr 89-08, "Erosion/Corrosion - Induced Pipe Wall Thinning."

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Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC GENERIC LETTER 89-08 EROSION/CORROSION -
INDUCED PIPE WALL THINNING

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Attn: T. E. Murley

July 19, 1989

Dear Dr. Murley:

This letter responds to NRC Generic Letter 89-08, "Erosion/Corrosion - Induced Pipe Wall Thinning," as it applies to the Donald C. Cook Nuclear Plant.

Generic Letter 89-08 requests that all holders of operating licenses for nuclear power plants respond on whether or not they have implemented or intend to implement a long term erosion/corrosion monitoring program. This program must provide assurances that procedures or administrative controls are in place to ensure that the NUMARC program or another equally effective program is implemented and that the structural integrity of all high-energy (two-phase as well as single-phase) carbon steel systems is maintained. If this program is not yet implemented, licensees are requested to include the scheduled implementation date.

An Erosion/Corrosion Inspection Program was established at the Cook Nuclear Plant in November 1982 for two-phase flow. This program was in response to I.E. Information Notice 82-22 and has been ongoing ever since. In August 1985, the Erosion/Corrosion Inspection Program was expanded to include single-phase flow systems. On December 22, 1988, a program consisting of systematic measures to ensure that erosion/corrosion does not lead to degradation of single-phase and two-phase high energy carbon steel systems was transmitted from AEPSC to Cook Nuclear Plant. This Erosion/Corrosion Inspection Program (two-phase as well as single-phase) has been implemented at Cook Nuclear Plant. The program was developed to ensure that NUMARC/EPRI guidelines are implemented.



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To date 763 components have been ultrasonically tested as a part of the Erosion/Corrosion Inspection Program at Cook Nuclear Plant.

Upon receipt of Generic Letter 89-08, an audit of this program was performed by AEPSC's Quality Assurance Division to ascertain whether the program complies with NUMARC/EPRI guidelines. The audit concluded that for the five critical attributes--system selection, inspection operation, review of results, repair/replacement and re-inspection--the program currently implemented at Cook Nuclear Plant is in compliance with NUMARC/EPRI guidelines. Enhancements were recommended in the audit to help formalize the long term implementation of the program. These enhancements will be added during the annual review of the Erosion/Corrosion Inspection Program, scheduled for completion in December 1989. We believe, with the recommended enhancement in place, there will be adequate assurance that Cook Nuclear Plant will continue to maintain the structural integrity of high energy carbon steel piping systems.

This letter is submitted pursuant to 10 CFR 50.54(f) and, as such, an oath of affirmation is enclosed.

Sincerely,

M. P. Alexich
Vice President

MPA/eh

cc: D. H. Williams, Jr.
W. G. Smith, Jr. - Bridgman
R C. Callen
Charnoff
EM Section Chief
B. Davis - Region III
C Resident Inspector - Bridgman

STATE OF OHIO)
COUNTY OF FRANKLIN)

Milton P. Alexich, being duly sworn, deposes and says that he is the Vice President of licensee Indiana Michigan Power Company, that he has read the forgoing Response to NRC Generic Letter 89-08, "Erosion-Corrosion Induced Pipe Wall Thinning" dated May 2, 1989 and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

M P Alexich

Subscribed and sworn to before me this 19th

day of July, 1989.

Lita D. Hice
NOTARY PUBLIC

My commission expires 6-29-94