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ACCESSION NBR: 9111120204 DOC. DATE: 91/11/04 NOTARIZED: YES DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316

AUTH. NAME AUTHOR AFFILIATION
 FITZPATRICK, E. American Electric Power Co., Inc.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to Generic Ltr 91-11, "Resolution of Generic Issues
 48, 'Interlocks & LCOs for Class 1E Vital Instrument Buses'
 & 49, 'Interlocks & LCOs for Class 1E Tie Breakers'."

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Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. DPR-58 and DPR-74
License Nos. 50-315 and 50-316
RESPONSE TO NRC GENERIC LETTER 91-11,
GENERIC ISSUES 48 AND 49

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

Attn: T. E. Murley

November 4, 1991

Dear Dr. Murley:

This letter provides our response to NRC Generic Letter (GL) 91-11, Generic Issues 48, "LCOs for Class 1E Vital Instrument Buses," and 49, "Interlocks and LCOs for Class 1E Tie Breakers." The generic letter requests information regarding the time limitations and surveillance requirements for vital instrument buses, inverters, and tie breakers that can connect redundant Class 1E buses (AC or DC) at one unit or that can connect Class 1E buses between units at the same site.

The resolution to Generic Issues 48 and 49 states that plant procedures shall include time limitations and surveillance requirements for the 120V AC vital bus system and for tie breakers between redundant Class 1E buses. We have reviewed the Cook Nuclear Plant Technical Specifications and determined that the time limitations and surveillance requirements mentioned in the generic letter are addressed, as described below.

The Cook Nuclear Plant 120V AC vital bus system consists of four 120V AC distribution panels per unit known as control room instrumentation distribution (CRID) panels. Each of these distribution panels is fed from a 7.5kVA inverter that is normally fed by the 250V DC system and is backed by a balance-of-plant regulating transformer known as the isolimiter. Section 3.8.2.1 of the Technical Specifications for both units states that an eight-hour limiting condition for operation is in effect if any of the 120V AC vital buses are inoperable or deenergized (i.e., the buses must be returned to operable status within eight hours or the unit must be shutdown). It is also noted in this section that these buses are considered operable only when fed from the battery-supplied inverter. Further, Technical Specification 4.8.2.1

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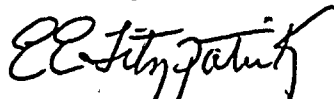
requires that the buses must be determined to be operable and energized by verifying proper alignment and indicated power availability at least once per 7 days.

Both units at Cook Nuclear Plant also have redundant train interconnections between the safety-related 600V buses (Bus A/Bus C and Bus B/Bus D) and between the AB and CD batteries. Technical Specification 3.8.2.1 states that the 600V buses must be operable and energized with the tie breakers open or an eight-hour limiting condition for operation is in effect. Also, as required by Technical Specification 3.8.2.3, the 250V DC buses must be operable and energized with the tie breakers open or a two-hour limiting condition for operation is in effect. Technical Specifications 4.8.2.1 and 4.8.2.3.1 provide weekly surveillance requirements that include verification that these tie breakers are open.

Thus, as outlined above, the Cook Nuclear Plant Technical Specifications already include the time limitation and surveillance requirements noted in the generic letter, and the plant continues to operate in an electrical configuration consistent with the regulations and its design bases.

As requested in the generic letter, our response is being submitted under oath according to the provisions of Section 182a of the Atomic Energy Act 1954, as amended, and 10 CFR 50.54(f).

Sincerely,



E. E. Fitzpatrick
Vice President

ldp

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
A. B. Davis - Region III
NRC Resident Inspector - Bridgman
NFEM Section Chief

STATE OF OHIO)
COUNTY OF FRANKLIN)

Eugene E. Fitzpatrick, being duly sworn, deposes and says that he is the Vice President of licensee Indiana Michigan Power Company, that he has read the foregoing Response to NRC Generic Letter 91-11, Generic Issues 48, "LCOs for Class 1E Vital Instrument Buses," and 49, "Interlocks and LCOs for Class 1E Tie Breakers" and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

E E Fitzpatrick

Subscribed and sworn to before me this 44

day of November, 1991.

Rita D. Hill
NOTARY PUBLIC

RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-28-94