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SUBJECT: Submits schedule commitments for modifying discrepant piping as result of plant large bore piping reconstitution program analyses.

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AEP:NRC:1100B

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
LARGE BORE PIPING RECONSTITUTION PROGRAM (LBPRP) SCHEDULE

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

ATTN: T. E. Murley

August 25, 1993

Dear Dr. Murley:

The purpose of this letter is to amend schedule commitments for modifying discrepant piping and/or pipe supports as a result of the Donald C. Cook Nuclear Plant (DCCNP) Large Bore Piping Reconstitution Program (LBPRP) analyses. In submittal AEP:NRC:1100A, and subsequent conversations with NRC staff, we committed to complete the program by 1996, over four refueling outages for each unit, and to fix the discrepant supports identified in the analyses. We were to make reasonable efforts at scheduling repairs, and we were to notify Region III when modifications could not be completed prior to unit startup. A six-month planning window prior to unit refueling outage is now being introduced to permit proper planning and resource allocation, and we now propose not to notify the region of modifications deferred until the next outage.

LBPRP BACKGROUND

A 1989-1990 study of a representative sample of safety-related piping systems at DCCNP confirmed that the piping systems meet operability criteria. The conclusions of this study stated that the piping systems at DCCNP are safe to operate in their current condition. This conclusion matched the findings from the evaluation of numerous piping and pipe support related discrepancies identified through the condition report mechanism. This information was presented at a conference which took place at the NRC Region III office on June 7, 1990.

The reanalysis of safety-related piping and pipe supports in the DCCNP Units 1 and 2 is being performed under the LBPRP. The LBPRP was committed to in 1990 as a proactive step by AEP/IMPCo to identify and correct piping and pipe support design basis discrepancies, and to establish design basis documentation. The LBPRP analytical work will run through 1996 and the resulting modifications are to be implemented in a planned and timely manner, in accordance with the commitments of AEP:NRC:1100A. These commitments included inspection, comparison to interim acceptance criteria, and operability and reportability determination for situations where as-found piping supports were found not to meet the original FSAR design requirements.

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As of June 30, 1993, we have completed 65 LBPRP piping analyses involving 1317 of the 6002 safety-related large bore pipe supports at DCCNP. The LBPRP modifications to date have involved pipe supports almost exclusively, with the exception of the occasional reinforcement of small bore branch line connections. No piping segment which required breach of the pressure boundary had to be modified. The expectation is that this will continue through the remainder of LBPRP.

LBPRP PIPE SUPPORT MODIFICATIONS AND REFUELING OUTAGES

The LBPRP analytical effort currently overlaps several scheduled unit refueling outages. The analysis of the safety-related piping systems will be continuous, and the results of the analysis may identify piping and/or pipe supports which will require modification to meet design basis limits.

The implementation of the modifications will require four refueling outages for each unit. The outages for Unit 1 are U1R92, U1R94, U1R95 and U1R97. The outages for Unit 2 are U2R92, U2R94, U2R96 and U2R97.

The implementation (before unit restart) of piping and/or pipe support modifications identified through the LBPRP analytical effort immediately before or during the U1R94, U2R94, U1R95 and U2R96 refueling outages creates difficulties with the planning and execution of the outages and increases the risks associated with the implementation of the modifications. In addition, the implementation of other short lead time pipe support modifications resulting from in service inspection work and other inspection and verification activities competes for resources and compounds the difficulty of outage planning and scheduling.

LBPRP PIPE SUPPORT MODIFICATION PLANNING WINDOW

To overcome these difficulties it has become necessary to formally establish a planning window (prior to the U1R94, U2R94, U1R95 and U2R96 refueling outages) for identification of LBPRP piping and/or pipe support modifications. This planning window will provide the necessary processing time for developing the design drawings of the modifications and for proper planning, scheduling and execution of the modifications. Modifications identified prior to the cut off date will be implemented before unit start-up following the next applicable refueling outage. Modifications identified after the cut off date will be implemented before start-up following the subsequent refueling outage. The balance of the modifications will be implemented during the U1R97 and U2R97 refueling outages.

The planning window required for the identification of LBPRP piping and/or pipe support modifications prior to the U1R94, U2R94, U1R95 and U2R96 refueling outages is set at six months prior to the planned start of each refueling outage. The cut off dates for the two 1994 refueling outages will be August 1993 and February 1994 for Unit 1 and 2, respectively. The six-month lead time will support the proper development of the outage schedules, the accurate identification and deployment of resources, the timely procurement of materials and the comprehensive ALARA review and planning.

In the unlikely event that the LBPRP analyses identify discrepancies that affect operability, the necessary modifications will be implemented immediately and appropriate reporting requirements will be executed.

We believe that the introduction of a six-month planning window for implementing piping and/or pipe support modifications resulting from the LBPRP analysis effort will provide for successful refueling outages, and safe and economical implementation of the modifications. This approach was discussed with J. Gavula, Region III and B. A. Wetzel of NRR on August 2, 1993, and they indicated their agreement. We intend to implement this approach unless we receive further correspondence on this issue from the NRC.

Sincerely,

E. E. Fitzpatrick
Vice President

dr

cc: A. A. Blind
G. Charnoff
J. B. Martin - Region III
NFEM Section Chief
NRC Resident Inspector - Bridgman
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