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 FITZPATRICK, E. American Electric Power Co., Inc.
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SUBJECT: Provides suppl response to GL 89-13, "Svc Water Sys Problems
 Affecting Safety-Related Equipment."

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American Electric Power
1 Riverside Plaza
Columbus, OH 43215 2373
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July 24, 1996

AEP:NRC:1104F

Docket Nos.: 50-315
50-316

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
GENERIC LETTER 89-13 SERVICE WATER SYSTEM PROBLEMS
AFFECTING SAFETY-RELATED EQUIPMENT

- Reference 1: AEP:NRC:1104 "Generic Letter 89-13; Service Water System Problems Response" from M.P. Alexich to A.B. Davis dated January 25, 1990
- Reference 2: AEP:NRC:1104A "Generic Letter (GL) 89-13; Service Water System Problem Response" from M.P. Alexich to A.B. Davis dated January 30, 1991
- Reference 3: NRC Inspection Reports No. 50-315/95003 (DRS); No. 50-316/95003 (DRS), "Report of the NRC Evaluation of the Service Water System Internal Assessment", dated August 4, 1995.

The original Cook Nuclear Plant response to Generic Letter 89-13 and the required confirmation of implemented actions are contained in references 1 and 2, respectively. The information found in the attachment to this letter provides supplementary information that reflects work completed since the submittal of reference 2. This letter fulfills our commitment as described in section 5.3.2 of reference 3 to update the staff of any necessary changes and revisions to commitments made in references 1 and 2.

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PDR ADCK 05000315
PDR

AD65
1/1

The attachment to this letter contains addenda to the information provided in reference 2 to reflect the work described above. The addenda do not represent reductions of previous commitments, and are being provided to maintain the clarity and accuracy of docketed information.

Sincerely,

for W. E. Fitzpatrick
E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 23rd DAY OF July, 1996.

Brian A. Hill
Notary Public

My Commission Expires: 6-28-99

/jen

Attachment

cc: A. A. Blind
H. J. Miller
NFEM Section Chief
NRC Resident Inspector - Bridgman
J. R. Padgett

bc: S. J. Brewer/D. H. Malin/T. A. Georgantis/L. M. Smart
J. A. Kobyra/K. R. Baker/D. R. Hafer
J. B. Shinnock
J. S. Wiebe
J. B. Hickman, NRC - Washington, DC - w/attachment
M. E. Eberhardt - w/attachment
PRONET - w/attachment
DC-N-6015.1

ATTACHMENT TO AEP:NRC:1104F

The following provides additional information to supplement our previous responses to actions I through V and enclosures 1 and 2 of GL 89-13. Each response item is listed below with either an addendum to the original response or a notation that no change to the original response is needed.

Response to Action I

No change to original response.

Response to Recommendation A of Enclosure 1 (1/25/90)

No change to original response.

Recommendation A of Enclosure 1 Program Implementation Summary (1/91)

No change to original response.

Addendum to Recommendation B of Enclosure 1 Response (1/25/90)

In our original response, it was indicated that temporary chlorination facilities can be connected to the open-cycle service water system at Cook Nuclear Plant. It was also indicated that a chlorination program would be prepared for chlorinating the service water system on a contingency basis. Since then we have obtained the necessary permits and have instituted continuous chlorination of the essential service water (ESW) system when biofouling species are most reproductive.

Additionally, it was indicated that the fire protection system would be treated shortly after the service water system. Since then a dedicated non-lake water source was installed to supply the fire protection system. This change was submitted in AEP:NRC:0692CW, dated 3/16/94, titled "Abandonment of Fire Pumps 1-PP-75 and 2-PP-75." Based on this submittal, the GL 89-13 concerns do not apply to the fire protection system.

Recommendation B of Enclosure 1 Program Implementation Summary (1/91)

No change to original response.

Addendum to Recommendation C of Enclosure 1 Response (1/25/90)

In our original response, it was indicated that partial flushing of the ESW supply to the auxiliary feedwater system alternate suction source was performed. Since then flushing connections have been installed to permit full flow flushing of these lines.

It was also indicated that the fire protection components are inspected or tested as scheduled on a twelve or eighteen-month cycle, and yard piping is flushed every six months. Since then a dedicated non-lake water source was installed to supply the fire protection system. This change was submitted in AEP:NRC:0692CW, dated 3/16/94, titled "Abandonment of Fire Pumps 1-PP-75 and 2-PP-75." Based on this submittal, the GL 89-13 concerns do not apply to the fire protection system.

Addendum to Recommendation C of Enclosure 1 Program Implementation Summary (1/91)

In our response under program implementation, several plant procedures are referenced. Since then some of these procedure references have changed. The following procedure changes are noted:

| PREVIOUS REFERENCE | NEW REFERENCE |
|--|---|
| 1 THP 4030 STP.241 ESW Flow Balance | 1 EHP 4030 STP.241 ESW Flow Balance |
| 2 THP 4030 STP.241 ESW Flow Balance | 2 EHP 4030 STP.241 ESW Flow Balance |
| MHI-4030 PM Task 72 PM and EQ | MHI-5030 PM Task 72 PM Sand Accumulation in ESW Piping |

Response to Recommendation D of Enclosure 1 (1/25/90)

No change to original response.

Recommendation D of Enclosure 1 Program Implementation Summary (1/91)

No change to original response.

Addendum to Response to Action II (1/25/90)

In our original response, the diesel driven fire pump lube oil coolers were included in the test program. However, these coolers are no longer part of the program since a dedicated non-lake water source was installed to supply the fire protection system. This change was submitted in AEP:NRC:0692CW, dated 3/16/94, titled "Abandonment of Fire Pumps 1-PP-75 and 2-PP-75." Based on this submittal, the GL 89-13 concerns do not apply to the fire protection system.

Response to Recommendation 1 of Enclosure 2 (1/25/90)

No change to original response.

Response to Recommendation 2 of Enclosure 2 (1/25/90)

No change to original response.

Response to Recommendation 3 of Enclosure 3 (1/25/90)

No change to original response.

Addendum to Recommendation 4 of Enclosure 2 (1/25/90)

In our original response, the diesel driven fire pump lube oil coolers were included in the test program. However, these coolers are no longer part of the program since a dedicated non-lake water source was installed to supply the fire protection system. This change was submitted in AEP:NRC:0692CW, dated 3/16/94, titled "Abandonment of Fire Pumps 1-PP-75 and 2-PP-75." Based on this submittal, the GL 89-13 concerns do not apply to the fire protection system.

Addendum to Action II Program Implementation Summary (1/91)

In our response under program implementation, several plant procedures are referenced. Since then some of these procedure references have changed. The following procedure changes are noted:

| PREVIOUS REFERENCE | NEW REFERENCE |
|---|---|
| 12 THP 6040 PER.002 | Canceled, incorporated into new procedures below |
| 12 THP 6040 PER.002.CCW CCW Ht Exchanger Functional Test | 12 EHP 6040 PER.002.CCW CCW Ht Exchanger Functional Test |
| 12 THP 6040 PER.002.EDG EDG Coolers Performance Test | 12 EHP 6040 PER.002.EDG EDG Coolers Performance Test |

Addendum to Response to Action III (1/25/90)

In our original response, it was indicated that the Cook Nuclear Plant inspection and maintenance program for open-cycle service water system piping and components is performed on a post-maintenance basis. Since then a formal inspection program has been instituted at the Cook Nuclear Plant. This program is performed per procedure 12 PMP 5030.001.005, "Essential Service Water System Inspection Program," approved 1/12/96. The procedure establishes a routine inspection and maintenance program for the components and piping of the service water system that ensures against degradation resulting from corrosion, erosion, silting and biofouling.

This action item also included inspection and flushing of the fire protection system. Since then a dedicated non-lake water source was installed to supply the fire protection system. This change was submitted in AEP:NRC:0692CW, dated 3/16/94, titled "Abandonment of Fire Pumps 1-PP-75 and 2-PP-75." Based on this submittal, the GL 89-13 concerns do not apply to the fire protection system.

Addendum to Action III Program Implementation Summary (1/91)

In our response under program implementation, several plant procedures are referenced. Since then some of these procedure references have changed. The following procedure changes are noted:

| PREVIOUS REFERENCE | NEW REFERENCE |
|---|---|
| MHI-5030 PM Task 72 PM and EQ Program | MHI-5030 PM Task 72 PM Sand Accumulation in ESW Piping |
| MHI-5030 PM Task 10 EDG Cooler Inspection | 12 MHP 5020.032.015 EDG Engine Intake Air Aftercooler |
| 12 SHP 5050 NDE.008 UT Insp for Thickness Measurements | 12 QHP 5050 NDE.008 UT Examination for Thickness Measurements |
| 12 SHP 5050 NDE.014 Grid Layout for Erosion/Corrosion | 12 QHP 5050 NDE.014 Grid Layout for Flow Accelerated Corrosion Examinations |

Addendum to Response to Action IV (1/25/90)

In our original response, it was indicated that a review of the Cook Nuclear Plant service water system confirmed that the system is capable of performing its required safety function in the event of a failure of a single active component. Since then a design basis reconstitution program has been instituted. This program has produced the essential service water design basis document (DBD) as well as other pertinent DBDs. The DBDs review and document the single failure criteria requirements and indicate that the ESW system is designed with appropriate redundancy to ensure that no single failure (mechanical, electrical or instrumentation) can prevent the system from performing its safety related function. This conclusion was also affirmed by the Service Water System Operational Performance Inspection conducted in 1995.

Action IV Program Implementation Summary (1/91)

No change to original response.

Response to Action V (1/25/90)

No change to original response.

Action V Program Implementation Summary (1/91)

No change to original response.

