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SUBJECT: Responds to 960614 RAI re third ten year inservice insp interval program plan & associated requests for relief.

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September 10, 1996

AEP:NRC:0969AW

Docket Nos.: 50-315
50-316

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

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
THIRD 10-YEAR INTERVAL INSERVICE
INSPECTION PROGRAM AND ASSOCIATED
REQUESTS FOR RELIEF (TAC NOS. M94871 AND M94872)
REQUEST FOR ADDITIONAL INFORMATION

This letter responds to your June 14, 1996, request for additional information regarding the third 10 year inservice inspection interval program plan and associated relief requests. The requested information is contained in Attachment 1 to this letter. Attachment 2 contains a summary of weld examinations where the third 10 year interval exam schedule does not agree with the first 10 year interval.

Sincerely,

E. E. Fitzpatrick
Vice President

jmb

Attachments

cc: A. A. Blind
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NFEM Section Chief
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ATTACHMENT 1 TO AEP:NRC:0969AW

REQUEST FOR ADDITIONAL INFORMATION REGARDING THE DONALD C. COOK
NUCLEAR PLANT, UNITS 1 and 2 THIRD 10 YEAR INTERVAL INSERVICE
INSPECTION PROGRAM PLAN AND ASSOCIATED REQUESTS FOR RELIEF
(TAC NOS. M94871 AND M94872)

The Cook Nuclear Plant units 1 and 2 third 10 year inservice inspection interval began on July 1, 1996. In accordance with 10CFR50.55(a), relief requests for examinations and inspections that cannot be conducted in accordance with the adopted edition of ASME Section XI must be demonstrated to the satisfaction of the NRC within 12 months after the start of the new inspection interval. Code relief requests for Cook Nuclear Plant, units 1 and 2 for examinations of components that could not be performed in accordance with ASME Section XI were submitted to the NRC in January 1996, in submittal AEP:NRC:0969AJ. Also provided with the required third 10 year interval code relief requests was a copy of the long term plan for the inservice inspection (ISI) program for each unit to facilitate the review of the code relief requests.

In a letter dated June 14, 1996, the NRC's reviewer (INEL) concluded that additional information was required based on the review of the ISI program. The purpose of this submittal is to provide the requested information.

The following lists each question as stated in the NRC correspondence dated June 14, 1996, (*italicized*) followed by our response.

Question A

Section I.1 references Code Cases N-491-1, N-498-1, N-509, N-521, and N-524. The code cases have not been approved for use by reference in Regulatory Guide N1.147. Therefore, to use these code cases, requests for relief are required. For use as a guide when preparing request for relief, attached is Appendix A, "Inservice Inspection: Guidance for preparing requests for relief from certain code requirements pursuant to 10CFR50.55(g)(5)."

Answer A

10CFR50.55 in footnote 6 references that the code cases listed in Regulatory Guide 1.147, Inservice Inspection Code Case Applicability, ASME Section XI can be used by reference in the long term plan without prior NRC approval. Because several code cases the Cook Nuclear Plant desires to use during the third 10 year interval are not listed in Regulatory Guide 1.147, code relief requests will be submitted to the NRC by October 31, 1996, and the long term plan will be revised accordingly.

Question B

A number of welds cannot be examined due to inaccessibility or component configuration. Code relief is requested for the third interval. Details of code relief requests are contained in Appendix E. Appendix E does not exist in the January 25, 1996, submittal. Provide the necessary requests for the relief for the welds that cannot be examined, this interval, due to inaccessibility or component configuration as required by 10CFR50.55a(g)(5)(iv).

Answer B

Appendix E was a courtesy copy of the long term plan. The code relief requests were inadvertently left out of the copy provided to the NRC. The contents of this appendix, however, are identical to the code relief requests we provided to the NRC in our letter AEP:NRC:0969AJ.

Question C

Many exams listed in the schedule of examinations contained in the long term plan do not appear to follow code successive examination requirements. The code requires the sequence of examinations established during the first inspection interval shall be repeated during each successive inspection interval, to the extent practical. However, many items seems to be scheduled for examination in the third interval without regard to when they were examined in the previous intervals. Provide a detailed technical position explaining how Donald C. Cook Nuclear Plant, Units 1 and 2, meets the Code successive examination requirements.

Answer C

ASME Section XI in paragraph IWB-2420, states that "sequence of component examinations established during the first interval shall be repeated during each successive inspection interval to the extent practical." Many changes were made to the sequence of component examinations; however, successive examination requirements were met to the extent practical. These changes were necessary to maximize examination coverage and reduce radiation exposure while meeting the requirements of successive examination to the extent practical. We believe that we meet the intent of the phrase "to the extent practical" where there are significant radiation exposure savings or improvement in examination coverages.

In inspection of piping, code changes between the first 10 year inspection interval and the third 10 year interval have required revisions to the allocations due to reclassification of systems (high pressure safety injection lines). In some cases, weld examinations which were performed during the first interval were not performed in the second interval due to differences in the edition of the code adopted during those intervals. To meet the ASME Section XI code requirements and Table IWX-2412, adjustments were necessary to balance the percentage of examination between periods. Attachment 2 lists these sorted by class and summary number in addition to the reason the change was made.

In the case of vessel examinations, the proposed use of code cases that defer examinations to the end of the interval (RPV nozzle to shell welds and nozzle inside radius examinations) and reductions in examination of some welds account for a majority of the differences.

Question D

The schedule of examinations, included in the long-term plan, contains no class 3 pressure tests. Appendix D Pages D-34 and D-35 (Units 1 and 2 respectively) states: "Class 3 pressure-retaining components will have pressure test scheduled by IMP, as maintenance requirements and plant technical specifications dictate." Do the technical specifications dictate a 10-year system hydrostatic test or periodic system pressure test? If not, how will the licensee ensure that Section XI pressure test requirements are met?

Answer D

The 10 year ISI system hydrostatic tests for class 3 components are conducted in accordance with technical specification 4.0.5, which requires conformance to ASME Section XI. The required system pressure tests for class 3 components are performed in accordance with ASME Section XI and Code Case N-498-1 as indicated in the third 10 year interval long term plan for units 1 and 2. We have been granted approval from the NRC in another request to use this code case at Cook Nuclear Plant as an alternative to hydrostatic testing. A code relief request to use Code Case N-498-1 for the third 10 year interval will be provided by October 31, 1996, as discussed in Answer A.

Question E

It appears that the scheduling of Unit 2, Examination Category B-D does not meet the code percentage requirements of IWA-2412. Was this an oversight? If not, provide a request for relief justifying this deviation from code requirements.

Answer E

The schedule for the ASME Section XI, Table IWB-2500, B-D welds for both units is consistent with code case N-521. We intend to use guidance provided in this code case for the units 1 and 2 reactor pressure vessel nozzle to shell welds and inside radius geometries. Request for approval to use this code case will be submitted as a relief request by October 31, 1996, as described in Answer A. The B-D welds for the unit 2 pressurizer are all scheduled in the first inspection period, which is not in compliance with Table IWB-2412. We will adjust the schedule of these welds for the third 10 year interval to agree with the schedule of the second 10 year interval and the long term plan will be revised accordingly.

Question F

Included with the submittal of the Donald C. Cook Nuclear Plant, Units 1 and 2, Third Ten Year Inservice Inspection Plan was several requests for Units 1 and 2. The requested date for these reliefs is associated with the second interval. However some of these reliefs state they are for the third interval. Furthermore, reliefs are mentioned in the third interval program but not included in the plan. Based on the conflicting information presented, it is unclear as to which interval the reliefs apply. Provide clarification as to what interval each of the reliefs is requested.

Answer F

All relief requests submitted in this package are for the third 10 year interval.

Question G

Provide a listing of the code cases being used at the Donald C. Cook Nuclear Plant, Units 1 and 2, that are included in Regulatory Guide 1.147, Inservice Inspection Code Case Acceptability ASME Section XI Division 1.

Answer G

Code Case N-481 has been approved for use in Regulatory Guide 1.147 and will be used in the third 10 year interval. As stated in Answer A, relief requests will be submitted by October 31, 1996, for code cases that have not been accepted in Regulatory Guide 1.147 that we intend to use during third 10 year inspection interval.

ATTACHMENT 2 TO AEP:NRC:0969AW

SUMMARY OF WELD EXAMINATIONS

Summary of weld examinations where scheduling of third interval exams does not agree with the first interval

Summary #	Weld I.D	Remarks
Unit 1		
<u>Class 1</u>		
022200	1-RC-1-14N	Perform 1st interval, rescheduled 3rd
024400	1-RC-2-12F	Aligned w/ associated longitudinal weld schedule
<u>Class 2</u>		
300010	STM-11-05	Aligned w/ STM-11-04 exam
300210	STM-12-MSN-IRS	Aligned w/ STM-12MSN nozzle exam
300480	RHE-1-13	Shifted from 2nd period to 3rd to balance distribution.
300490	RHE-1-16	Shifted from 2nd period to 3rd to balance distribution.
300500	RHE-1-13	Shifted from 2nd period to 3rd to balance distribution
300510	RHE-1-13	Shifted from 1st period to 3rd to balance distribution.
300680	1-CVCT-1	Shifted from 1st period to 3rd to balance distribution
300690	1-CVCT-2	Shifted from 2nd period to 3rd to balance distribution
301600	1-SI-3-09S	Perform 1st interval, rescheduled 3rd
302600	1-SI-21-09S	Perform 1st interval, rescheduled 3rd
304290	1-SI-70-11F	Perform 1st interval, rescheduled 3rd
307320	1-RH-8-18F	Perform 1st interval, rescheduled 3rd
310930	1-FW-10-17S	Shifted from 2nd period to 3rd to balance distribution
311170	1-FW-11-13S	Perform 1st interval, rescheduled 3rd
311560	1-FW-13-09S	Perform 1st interval, rescheduled 3rd
312060	1-FW-17-07S	Shifted from 2nd period to 3rd to balance distribution
313000	1-FW-31-01S	Perform 1st interval, rescheduled 3rd
314210	1-MS-10-07S	Perform 1st interval, rescheduled 3rd
314410	1-MS-11-13S	Perform 1st interval, rescheduled 3rd
315240	1-MS-190-02S	Perform 1st interval, rescheduled 3rd
Unit 2		
<u>Class 1</u>		
045100	2-RC-31-11	Perform 1st interval, rescheduled 3rd

048400	2-RC-32-08	Perform 1st interval, rescheduled 3rd
050800	2-RC-33-02	Perform 1st interval, rescheduled 3rd
054700	2-RC-34-03	Shifted from 1st period to 3rd to balance distribution
055100	2-RC-34-04	Shifted from 1st period to 3rd to balance distribution
055200	2-RC-34-05	Shifted from 1st period to 3rd to balance distribution
055400	2-RC-34-06	Shifted from 1st period to 3rd to balance distribution
055500	2-RC-34-07	Shifted from 1st period to 3rd to balance distribution
058200	2-RC-34-29	Perform 1st interval, rescheduled 3rd
065700	2-RC-514-02	Perform 1st interval, rescheduled 3rd
072100	2-RC-515-25	Perform 1st interval, rescheduled 3rd

Class 2

300260	STM-23-08	Perform 1st interval, rescheduled 3rd
300700	E-RHRHEX-IN	Shifted from 2nd period to 3rd to balance distribution
300840	2-BIT-A	Shifted from 2nd period to 3rd to balance distribution
300850	2-BIT-B	Shifted from 2nd period to 3rd to balance distribution
310020	2-SI-7-02S	Perform 1st interval, rescheduled 3rd
310370	2-SI-7-36S	Perform 1st interval, rescheduled 3rd
310720	2-SI-8-30S	Perform 1st interval, rescheduled 3rd
310800	2-SI-8-37S	Perform 1st interval, rescheduled 3rd
310950	2-SI-9-09S	Perform 1st interval, rescheduled 3rd
312490	2-SI-77-05S	Perform 1st interval, rescheduled 3rd
318710	2-FW-72-12S-PL1 and 2	Perform 1st interval, rescheduled 3rd
319530	2-FW-76-05F	Perform 1st interval, rescheduled 3rd
320130	2-FW-80-03S	Perform 1st interval, rescheduled 3rd
320510	2-FW-89-04S	Perform 1st interval, rescheduled 3rd
321690	2-MS-94-15S	Perform 1st interval, rescheduled 3rd
322370	2-MS-193-01F	Perform 1st interval, rescheduled 3rd