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SUBJECT: Provides follow-up response to GL 96-05, "Periodic
 Verification of Design Basis Capability of Safety Related
 MOV Verification Program."

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April 18, 1997

AEP:NRC:0966AG

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
GENERIC LETTER 96-05 PERIODIC VERIFICATION OF
DESIGN BASIS CAPABILITY OF SAFETY RELATED
MOV VERIFICATION PROGRAM/FOLLOW-UP RESPONSE

The U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 96-05, "Periodic Verification of Design Basis Capability of Safety-Related Motor-Operated Valves" on September 18, 1996. The GL requests a licensee to "...establish a program, or to ensure the effectiveness of its current program, to verify on a periodic basis that safety-related motor operated valves (MOVs) continue to be capable of performing their safety functions within the current licensing bases of the facility." By letter dated November 7, 1996 (AEP:NRC:1166AF), we provided a response indicating we would implement the actions requested by GL 96-05. The purpose of this letter is to provide our follow-up response to GL 96-05 describing the safety related MOVs periodic verification program.

We have completed a review of our current MOV periodic verification program. This review indicates certain enhancements will need to be made to meet the intent of GL 96-05. We are currently participating in the Joint BWR and Westinghouse Owner's Group (JOG) program on GL 96-05. We intend to implement the JOG periodic verification program as outlined in MPR Report 1807, Rev. 0, submitted to the NRC via WOG letter OG-97-018. Under the JOG, we plan to participate in the generic industry-wide differential pressure (DP) testing program which is under development. We will evaluate the DP program for implementation upon completion. Meanwhile, the scope of the MOVs in the periodic verification program will remain the same as our current GL 89-10 program.

The schedule to implement the JOG program to meet the intent of GL 96-05 will be the first quarter of 1998.

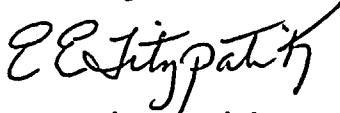
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The attachment provides a summary of the current MOV periodic verification program and necessary actions for the implementation of the JOG program.

Sincerely,



E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 18th DAY OF April 1997



Jan Watson
Notary Public

My Commission Expires _____

JAN WATSON

NOTARY PUBLIC, BERRIEN COUNTY, MI
MY COMMISSION EXPIRES FEB. 10, 1999

vlb

Attachment

cc: A. A. Blind
A. B. Beach
MDEQ - DW & RPD
NRC Resident Inspector
J. R. Padgett

ATTACHMENT TO AEP:NRC:0966AG
SUMMARY OF CURRENT MOV PROGRAM

SUMMARY OF CURRENT MOV PROGRAM

Static Testing

Static testing of motor operated valve (MOV) actuators is applicable to all GL 89-10 actuators and is currently tied to the preventive maintenance activities. The frequency of the static testing is currently based on service conditions, past equipment history, and GL 89-10 requirements. The longest time frame between static testing is presently five years. The actuator testing consists of both an "as found" and "as left" diagnostic test utilizing diagnostic test equipment to measure thrust, motor current, spring pack movement, torque, and limit switch actuation. The preventive maintenance of the actuator consists of a general inspection of actuator condition, spring pack testing, grease inspection, re-lubrication of the valve stem, torque and limit switch condition and setting. In the future, the testing and preventive maintenance frequency may be adjusted as deemed appropriate under Cook Nuclear Plant's preventive maintenance program and the transition to a risk based frequency as described in the JOG report MPR-1807.

Dynamic Testing

Differential pressure (DP) testing of the actuator and valve is only possible on certain valves. Under GL 89-10, actuators and valves were tested under DP conditions to the extent practicable. This testing allowed us to determine which actuators and valves could provide meaningful DP results. The periodic testing of MOVs under dynamic conditions was not planned under the current GL 89-10 program. We will be participating in the JOG industry-wide program. Under the JOG program, we will be supplying test data on four butterfly valves.

Program Implementation

The final transition from our current GL 89-10 program to the JOG program to meet GL 96-05 will be based on the acceptance of the JOG program by the NRC. Once acceptance is received, the JOG static testing matrix, based on thrust margin and risk analysis, can be applied to present static testing frequencies. For DP testing, because this program is not finalized we plan to continue review of the program to ensure all valve types are covered under the JOG program. For valves not covered by the JOG program, a determination will be made to either apply Electric Power Research Institute (EPRI) performance prediction methodology or set up a DP frequency as recommended in JOG report MPR-1807. The JOG has plans to review a non-mandatory code case OMN-1, entitled "Alternative Rules for Preservice and Inservice Testing of Certain Electric Motor Operated Valve Assemblies in LWR Power Plants, OM Code 1995 Edition; Subsection ISTC", but the review is not complete at this time. Therefore, our current IST stroke time testing will be maintained until the JOG completes the review. We will then review the recommendations and determine applicability, including necessary IST program changes.

