

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315  
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316  
 AUTH. NAME: AUTHOR AFFILIATION  
 ALEXICH, M.P. Indiana & Michigan Electric Co.  
 RECIP. NAME: RECIPIENT AFFILIATION  
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards schedule for revising procedures to inservice test  
 (IST) program for pumps & valves, in response to NRC  
 850904 SER. Insertion of encl revised pates into IST  
 requested.

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NOTES: 05000315  
 OL: 10/25/74  
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# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

October 15, 1985  
AEP:NRC:0730H

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
INSERVICE TEST PROGRAM - PUMPS & VALVES  
SCHEDULE FOR UPDATE

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555


Reference: NRC Safety Evaluation Report dated September 4, 1985.

Dear Mr. Denton:

This letter and its attachments are in response to the NRC Safety Evaluation Report (SER) dated September 4, 1985, issued for the Inservice Test (IST) Program for pumps and valves at the Donald C. Cook Nuclear Plant. Attachment 1 contains Indiana & Michigan Electric Company's responses and schedule for updating the IST program for the items noted in Appendix D to the NRC SER. Plant procedures will be revised in accordance with the dates noted in Attachment 1, and the testing will be performed at the next scheduled interval for each item. Attachment 2 contains the revised pages to the IST Program for Units 1 and 2 as noted in response to Item D.15. We request that these two pages (for each unit, page 7 of 9, Rev. 1 of valve summary sheet) be inserted in the IST Program for Units 1 and 2.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

  
M. P. Alexich  
Vice President  
RAX  
10/15/85

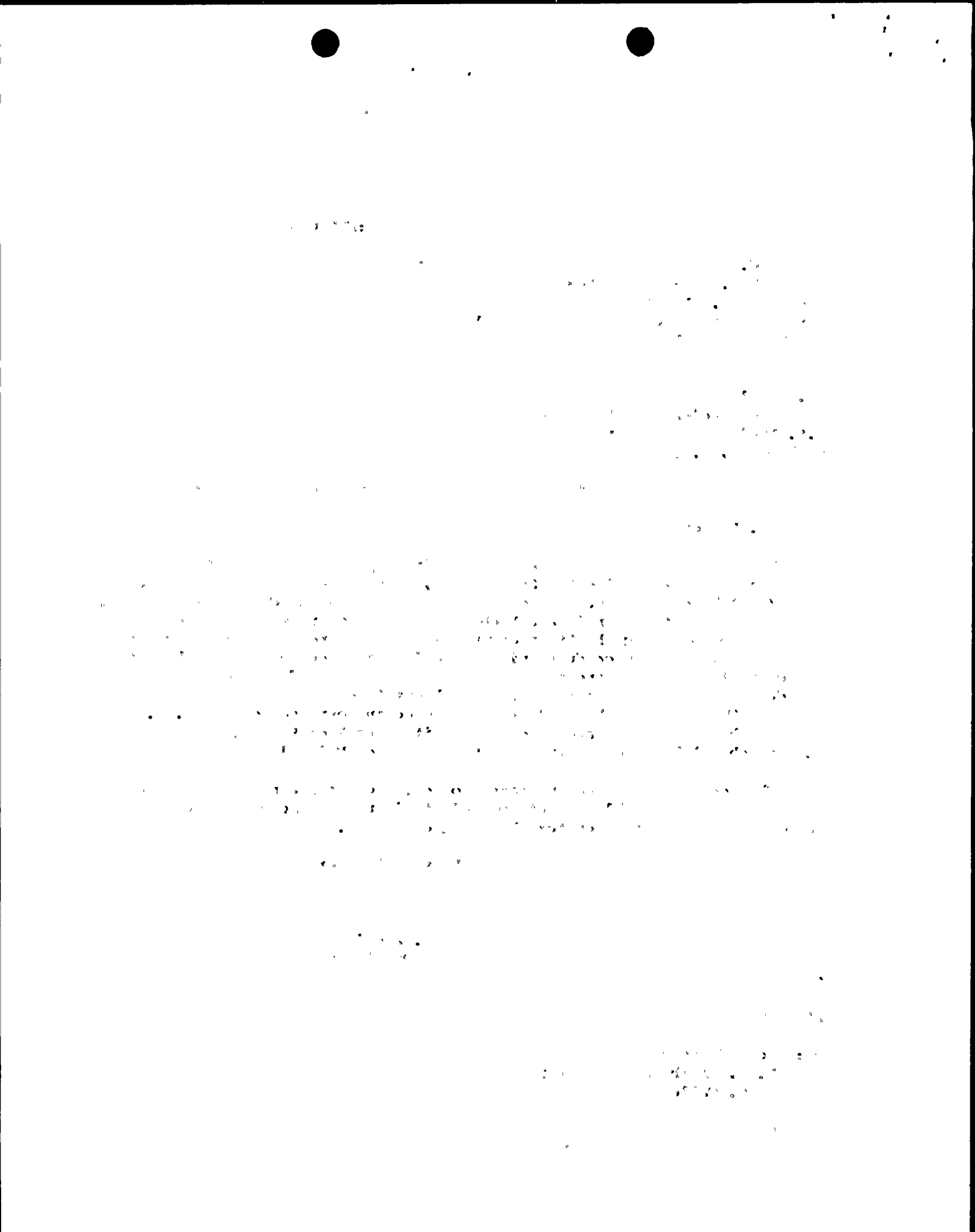
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## Attachments

cc: John E. Dolan  
W. G. Smith, Jr. - Bridgman  
R. C. Callen  
G. Bruchmann  
G. Charnoff  
NRC Resident Inspector - Bridgman

A047  
1/1



ATTACHMENT NO. 1

TO

AEP:NRC:0730H

DONALD C. COOK NUCLEAR PLANT

ATTACHMENT NO. 1 to AEP:NRC:0730H

The following are the Indiana & Michigan Electric Company responses to the items listed in Appendix D of the NRC Safety Evaluation Report dated September 4, 1985.

- REFERENCES: (1) Safety Evaluation Report (SER) dated September 4, 1985, Pump and Valve Inservice Testing Program  
D. C. Cook Nuclear Power Station, Units 1 and 2  
For the Remainder of the First 10-Year Interval.
- (2) ASME Boiler & Pressure Vessel Code Section XI, 1974 Edition with Addenda through Summer 1975 (Section XI).

Those relief requests which were granted by the SER have been incorporated into the IST Pump and Valve Program for the first 10-year interval (IST Program). Testing is proceeding on that basis.

All valves noted in paragraph 3.1.8 of the SER have been classified as either Category "A" or "AC" in Revision 1 of the IST program with the exception of IMO-315, -325, and -128. These valves are classified as Category B for the reasons stated below. Valves IMO-315, and -325 do not perform a pressure isolation (PIV) function; the PIV function is performed by check valves SI-166L1 through L4, SI-158L1 through L4, SI-151E & W, and SI-152N & S. These check valves are categorized as "AC" and seat leakage tested per Section XI requirements. For IMO-128, the Reactor Coolant System leakage is precluded by the leak-tight integrity of double disc gate valve IMO-129, which will now be leak tested, refer to Item D.9.

Discussion and schedules to complete the IST Pump and Valve Program and related plant procedure revisions pursuant to the items identified in Appendix D are presented below. The revisions to the IST Program will be/have been issued internally (AEPSC and D. C. Cook) and will be included, as applicable, in our program to be submitted to your staff by January 1986 for the second 10-year interval.

Item D.1: The licensee's proposed pump vibration monitoring program is not consistent with Section XI. (See Item 2.1.1 of this report.)

Response: Vibration amplitude will continue to be measured in terms of displacement with the acceptance criteria being that specified in Section XI. The relief request is withdrawn.

Schedule: The IST Program will be revised by October 15, 1985. There are no plant procedure revisions required.

Item D.2: The licensee has requested relief from all the leak-rate testing requirements of Section XI for all containment isolation valves and proposed to utilize 10 CFR 50, Appendix J, requirements. (See Item 3.2.2.1 of this report.)

Response: Containment isolation valves (CIV) are being seat leakage tested in accordance with the 10 CFR 50, Appendix J Program. The IST Program will be revised to include analysis of leakage rates and corrective action for containment isolation valve leak-rate testing pursuant to IWV-3420 (f) and (g) of Section XI.

Schedule: The IST Valve Program will be revised to include this requirement by October 15, 1985. Acceptance leak rates will be developed for each Unit 2 CIV by December 15, 1985. Implementation in Unit 2 will be during the next scheduled refueling outage estimated to begin in the first quarter of 1986. The next Unit 1 refueling outage is scheduled in the second 10-year interval; therefore, the IST Valve Program for the second 10-year interval will include these requirements for Unit 1 as well as Unit 2.

Item D.3: The licensee has not provided sufficient technical justification for not exercising WMO-754, -753 and -744, essential service water to the emergency feedwater system isolation valves, during power operation. (See Item 3.5.1.1 of this report.)

Response: Valves WMO-744, WMO-753 and WMO-754 will be full-stroke exercised and stroke-timed quarterly.

Schedule: Revised IST Program sheets will be issued by October 15, 1985. Plant procedures for this testing will be issued by November 15, 1985.

Item D.4: The licensee has not provided a revised relief request to justify not exercising valves QCM-250 and -350 quarterly. (See Item 3.8.1.1 of this report and Item I.9 of the working meeting minutes.)

Response: The relief request justification (Note 3) for QCM-250 and QCM-350 will be revised as follows to agree with SER:

"These motor-operated reactor coolant pump seal water return isolation valves cannot be exercised during power operation because it would interrupt reactor coolant pump seal water flow and could cause damage to the seals. Therefore, the valves are full-stroke exercised at cold shutdowns."

Schedule: The above revision has no impact on physical testing since relief has been granted. The program will be revised as part of the second 10-year interval submittal.

Item D.5: The licensee has supplied no information to justify not exercising valves CS-299E and -299W during power operation (See Item 3.8.2.2 of this report.)

Response: The relief request justification (Note 8) for CS-299E and CS-299W will be revised as follows to agree with the SER:

"These check valves located on the discharge lines of the 'E' and 'W' charging pumps function as pressure isolation valves to protect the low pressure charging pump suction lines. These valves cannot be full-stroke exercised during: (1) power operation because the charging pumps cannot achieve maximum flow rate with the reactor at full pressure, and (2) cold shutdown because the flow required could cause a low temperature overpressure condition. The valves will be part-stroke exercised quarterly and full-stroke exercised during refueling outages."

Schedule: The above revision has no impact on physical testing since relief has been granted. The program will be revised as part of the second 10-year interval submittal.

Item D.6: The licensee has supplied no information to justify not exercising valve SI-185 during power operation. (See Item 3.8.4.1 of this report.)

Response: The relief request justification (Note 5) for SI-185 will be revised to agree with the SER as follows:

"This normally closed valve functions to transfer the suction source of the charging pumps to the refueling water storage tanks. This valve cannot be exercised during: (1) power operation without introducing a high concentration of boric acid in the RCS, and (2) cold shutdown because the only full flow path available is into the reactor coolant system and the system does not have sufficient volume to accommodate that flow without a possible low temperature overpressure condition. The relief request (3.8.4.1) for not testing (part or full stroke) during power operation was previously granted. The valve will be full stroke exercised during refueling outages."

Schedule: The above revision has no impact on physical testing since relief has been granted. The program will be revised as part of the second 10-year interval submittal.



Item D.7: The licensee is presently partial-stroke exercising valves CS-415-1, -2, -3 and -4, boric acid transfer pump discharge checks, during power operation and full-stroke exercising these valves during cold shutdowns. This exercising frequency is in accordance with Section XI, however, the licensee has failed to provide a cold shutdown justification for these valves.

Response: Boric acid transfer pump discharge check valves (CS-415-1, CS-415-2, CS-415-3, and CS-415-4) will be full-stroke exercised to open quarterly. The program will be revised accordingly.

Schedule: Revised IST Program sheets will be issued by October 15, 1985. Plant procedures for this testing will be issued by November 15, 1985.

Item D.8: The licensee has failed to provide sufficient technical information to explain why valves QRV-411, -421, -412, and -422 cannot be tested in compliance with Section XI. (See Items 3.9.1.1. and 3.9.1.2 of this report.)

Response: We have reviewed the system design and determined that valves QRV-411, QRV-412, QRV-421 and QRV-422 can be tested in accordance with Section XI.

Schedule: Revised IST Program sheets will be issued by October 15, 1985. Plant procedures for this testing will be issued by November 15, 1985.

Item D.9: The licensee does not propose to leak test pressure boundary isolation valve ICM-129, residual heat removal system hot leg suction (See Item 3.14.1.1 of this report.)

Response: Valve ICM-129 will be seat-leakage tested in accordance with Section XI requirements. The permissible seat leakage rate will be specified in the IST Program. The IST Program will be revised accordingly.

Schedule: Revised IST Program sheets will be issued by October 15, 1985. The leak-rate test of this valve will require a new procedure to be developed and may require modifications to facilitate testing during the one-hour period available. Plant procedures will be issued in time to perform this testing during the second 10-year interval.

Item D.10: The licensee has proposed to full-stroke exercise valve SI-148, residual heat removal pump refueling water tank suction check, only during refueling outages. System modifications are required to allow exercising this valve at least during cold shutdowns without jeopardizing the availability of other safety systems (See Item 3.14.2.1 of this report.)

Response: An evaluation is being performed to determine the best method of stroke testing SI-148.

Schedule: The results of this evaluation will be incorporated in our submittal for the second 10-year inspection interval currently scheduled for January 1986.

Item D.11: The licensee has failed to describe the method utilized to measure the stroke time of the diesel generator air start valves, therefore these valves must be stroke timed in accordance with Section XI.

Response: Valves XRV-221, -222, -223, -225, -226, and -227 will be stroke timed as part of the emergency diesel starting sequence. The IST Program will be revised to state that: "Operability of these valves will be based upon obtaining Technical Specification-acceptable diesel generator start times (less than or equal to 10 seconds)."

Schedule: Revised IST Program sheets will be issued by October 15, 1985. Plant procedures will be revised to state this acceptance criteria by November 15, 1985.

Item D.12: The licensee has not provided the limiting value of full-stroke time for the power operated valves in the IST Program. The licensee has stated that a base line stroke time and a limiting stroke time are being developed and will be implemented by the start of the next ten year inspection interval, approximately July, 1986. This item will require further review.

Response: The base-line stroke time and limiting stroke time values for the power-operated valves are being developed. Approximately 95% of the required values have been furnished to D. C. Cook Nuclear Plant. This task will be completed by January 1, 1986. The limiting stroke time values for all valves requiring stroke timing will be specified in the submittal for the second 10-year interval and will be implemented in the second 10-year interval.

Item D.13: The licensee will be required to have an operable safety grade post-accident sampling system, however, this staff position should not impose a hardship upon the licensee because the system is presently in place and has been included in the IST program. The sample return check valve, NS-357, is the only valve in this system that is not presently being tested in accordance with Section XI and is the only valve for which the testing program must be modified. Other required changes to the program are editorial in nature and merely serve to bring the "Valve Position" column into agreement with the tests presently being performed. (See Post Accident Sampling System and Item 3.6.1.1 of this report.)

Response: We are proceeding to include the sample return valve NS-357 in the IST Program for flow-through testing. However, since the line is open-ended inside containment, we are reviewing potential test methods and may require additional code relief.

The following is the additional information as requested by your staff.

The Post-Accident Liquid and Gas Sampling System (PASS) at D. C. Cook Nuclear Plant was designed in accordance with the requirements of:

- NUREG-0578, Items 2.1.8 and 2.1.8a
- Discussion of Lesson Learned Short-Term Requirements  
Transmitted Via Mr. H. R. Denton's October 30, 1979 Letter
- NUREG-0737, Item II.B.3

In regard to the classification of the PASS, the attachment to Mr. Denton's October 30, 1979 letter stated: "...the seismic design and quality group classification or [sic] sampling lines and components shall conform to the classification of the system to which each sampling line is connected. Components and piping downstream of the second isolation valve can be designed to Quality Group D and nonseismic Category I requirements."

Testing pursuant to the requirements of ASME B&PV Code Section XI is required for systems and components identified as ASME Code Class 1, 2 or 3. Regulatory Guide 1.26, "Quality Group Classifications and Standards for Water-, Steam-, Radioactive-Waste-Containing Components of Nuclear Power Plants," defines the acceptable quality standards for each group. Table 1 of this regulatory guide places the quality standards of Group D outside the bounds of the ASME Code Classification. Therefore, it is our belief that the PASS components need not be tested in accordance with the provisions of ASME B&PV Code Section XI. The ISI/IST Programs submitted have been based upon this understanding. The SER states that NS-357 is the only PASS valve not included in the IST Valve Program. The valves utilized in the PASS that are included in the IST Valve Program are those classified as Code Class 2 for containment isolation

purposes. There are numerous other valves whose function is for post-accident sampling that are not tested under the requirements of Section XI. We ask you to reevaluate your position on testing PASS components in accordance with the requirements of ASME B&PV Code Section XI and advise us accordingly.

Schedule: The results of our review will be incorporated into our submittal for the second 10-year interval due January 1986 unless you agree with the PASS classification based upon the additional justification provided above.

Item D.14: By a letter dated June 9, 1983 the licensee responded to IE Bulletin 83-03 regarding check valve failures in raw water cooling systems of diesel generators. Although the subject check valves are included in the licensee's IST program, they are only subjected to forward flow verification. The licensee indicated that these valves are disassembled and inspected each refueling outage as part of Maintenance Procedure 12 MPH 5021.032.001L, but not as a requirement of the IST program. The staff requires that the licensee revise its IST program to include this testing in addition to the full stroke (forward direction).

Response: The valves are as follows:  
Unit No. 1: ESW-111, ESW-112, ESW-113, ESW-114;  
Unit No. 2: ESW 141, ESW-142, ESW-143, ESW-144.

A note will be added to the IST Program stating: "These valves will be disassembled and inspected internally per Procedure No. 12 MHP 5021.032.001L during every refueling outage" to agree with the SER.

Schedule: The above revision has no impact on physical testing. Therefore, the program will be revised as part of the second 10-year interval submittal due January, 1986.

Item D.15: The licensee's response to the working meeting questions indicated that a stroke time test would be added into its IST program for ECC-RHR valves IMO-315, -316, -325 and -326. This change was included in revision 1 to its program along with an indicated relief request as NOTE 17; however, this note was not included in its program. The licensee should therefore provide the details of its relief request in order for the staff to make a safety finding.

Response: The attached page 7 of 9 for both units addresses the above issue.

Schedule: No IST Program revision is required.

Item D.16: In the licensee's responses to the working meeting dated May 10, 1985, its [sic] stated that the spent fuel pit cooling pumps/system are not required for the safe shutdown of the plant nor does it mitigate the consequences of an accident; therefore the spent fuel pit cooling system is not classified ASME Code Class 1, 2 or 3 and will not be included in the IST program. The staff does not agree with the licensee on this issue for the following reasons:

- A. Regulatory Guide 1.26 requires that cooling water and auxiliary feedwater systems or portions of these systems important to safety that are designed for residual heat removal from the spent fuel storage pool (including primary and secondary cooling systems) should be classified as quality group C.
- B. Regulatory Guide 1.29 designates that cooling water systems or portions of these systems that are required for cooling the spent fuel storage pool are Seismic Category I.
- C. Regulatory Guide 1.13 states that a seismic Category I makeup system or other reliable source should be provided to add coolant to the pool.

For these reasons the staff requires that the licensee include its spent fuel pool cooling (primary and secondary side) and makeup system pumps and valves in the IST program.

Response: The Spent Fuel Pit Cooling System (SFP) will be added to the IST Programs to agree with the SER.

The Donald C. Cook Plant design criteria is not committed to the Regulatory Guides listed above. The original Cook Plant design did not incorporate a dedicated spent fuel pit make-up system. There are various diverse make-up water sources normally available. These sources include: (1) Primary Water System, (2) Fire Protection System, (3) Unit 1 and 2 Refueling Water Systems, and (4) Chemical and Volume Control System. Since there is no dedicated make-up system, we have not included it in our ISI/IST Program.

Schedule: The IST program will be revised by October 15, 1985 to include the Spent Fuel Pit Cooling System. Plant procedure(s) for this testing will be issued by January 15, 1986.

Item D.17: The licensee has failed to provide the justification for relief on the frequency of testing for the manual valves for essential service water to the control room air conditioning system (See Item 3.5.1.2 of this report).

Response: The IST Program will be revised to full-stroke exercise the following valves quarterly:

ESW-168N and S, and ESW-170N and S; ESW-169N and S, and ESW-171N and S.

Schedule: Revised IST Program sheets will be issued by October 15, 1985. Plant procedures for this testing will be issued by November 15, 1985.

ATTACHMENT NO. 2

TO

AEP:NRC:0730H

## DONALD C. COOK NUCLEAR PLANT

## VALVE SUMMARY SHEET

TI  
APERTURE  
CARDSYSTEM NAME EMERGENCY CORE COOLING - RHRFLOW DIAGRAM 2-5143-27PAGE 7 OF 9Also Available On  
Aperture Card

VALVE					VALVE POSITION		ASME SECTION XI					
NUMBER	TYPE	SIZE	ACTUATOR TYPE	FLOW DIA. COORD	POWER OPERATION	SAFETY FUNCTION	CODE CLASS	CATEGORY	PRIMARY TEST REQUIRED	TEST PERFORMED	ACTUAL TEST MODE	EXEMPTION
IMO-140	GA	10	MO	D/4	O	O	2	B	EF-1	EF-2	C	YES, NOTE 13
									ET-3	ET-3	C	NO
SI-194	GL	3/4	M	G/6	C	C	2	AE	OC-1	OC-1	P	NO
									SLT-1	SLT-2	R	YES, NOTE 5
SI-171	GL	3/4	M	H/6	LC	C	2	AE	OC-1	OC-1	P	NO
									SLT-1	SLT-2	R	YES, NOTE 5
SI-172	GL	3/4	M	H/6	LC	C	2	AE	OC-1	OC-1	P	NO
									SLT-1	SLT-2	R	YES, NOTE 5
NOTE 16: RH-108E and RH-108W												
These valves cannot be full stroke exercised quarterly because no full flow path exists. The valves will be full stroke exercised during cold shutdowns (during RHR operation).												
NOTE 17: IMO-315, -316, -325 and -326												
Valves IMO-315 and -325 are normally closed valves, located in the RHR and SI Supply Header to RCS hot legs. Valves IMO-316 and -326 are normally open valves located in the RHR and SI supply header to RCS cold legs. These valves cannot be exercised during power operation because failure in a nonconservative position would result in less than minimum number of injection flow path as required by the FSAR. The valves will be full stroke tested during cold shutdown.												

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REVISION NO. 1DATE 4/19/85PREPARED BY AEPSC-MED

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## DONALD C. COOK NUCLEAR PLANT

## VALVE SUMMARY SHEET

TI  
APERTURE  
CARDSYSTEM NAME EMERGENCY CORE COOLING - RHRFLOW DIAGRAM 1-5143-26PAGE 7 OF 9Also Available On  
Aperture Card

VALVE					VALVE POSITION		ASME SECTION XI						Ala A
NUMBER	TYPE	SIZE	ACTUATOR TYPE	FLOW DIA. COORD	POWER OPERATION	SAFETY FUNCTION	CODE CLASS	CATAGORY	PRIMARY TEST REQUIRED	TEST PERFORMED	ACTUAL TEST MODE	EXEMPTION	
IMO-140	GA	10	MO	D/4	O	O	2	B	EF-1	EF-2	C	YES,NOTE 13	
SI-194	GL	3/4	M	G/6	C	C	2	AE	ET-3	ET-3	C	NO	
									OC-1	OC-1	P	NO	
SI-171	GL	3/4	M	H/6	LC	C	2	AE	SLT-1	SLT-2	R	YES,NOTE 5	
									OC-1	OC-1	P	NO	
SI-172	GL	3/4	M	H/6	LC	C	2	AE	SLT-1	SLT-2	R	YES,NOTE 5	
									OC-1	OC-1	P	NO	
									SLT-1	SLT-2	R	- YES,NOTE 5	
NOTE 16: RH-108E and RH-108W													
These valves cannot be full stroke exercised quarterly because no full flow path exists. The valves will be full stroke exercised during cold shutdowns (during RHR operation).													
NOTE 17: IMO-315, -316, -325 and -326													
Valves IMO-315 and -325 are normally closed valves, located in the RHR and SI Supply Header to RCS hot legs. Valves IMO-316 and -326 are normally open valves located in the RHR and SI supply header to RCS cold legs. These valves cannot be exercised during power operation because failure in a nonconservative position would result in less than minimum number of injection flow path as required by the FSAR. The valves will be full stroke tested during cold shutdown.													

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DOCKET NO(S). 50-315/316  
Mr. John Dolan, Vice President  
Indiana and Michigan Electric Company  
c/o American Electric Power Service Corporation  
1 Riverside Plaza  
Columbus, Ohio 43215

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNITS 1/2

The following documents concerning our review of the subject facility are transmitted for your information.

- ☐ Notice of Receipt of Application, dated \_\_\_\_\_.
- ☐ Draft/Final Environmental Statment, dated \_\_\_\_\_.
- ☐ Notice of Availability of Draft/Final Environmental Statement, dated \_\_\_\_\_.
- ☐ Safety Evaluation Report, or Supplement No. \_\_\_\_\_, dated \_\_\_\_\_.
- ☐ Notice of Hearing on Application for Construction Permit, dated \_\_\_\_\_.
- ☐ Notice of Consideration of Issuance of Facility Operating License, dated \_\_\_\_\_.
- ☐ Monthly Notice; Applications and Amendments to Operating Licenses Involving no Significant Hazards Considerations, dated \_\_\_\_\_.
- ☐ Application and Safety Analysis Report, Volume \_\_\_\_\_.
- ☐ Amendment No. \_\_\_\_\_ to Application/SAR dated \_\_\_\_\_.
- ☐ Construction Permit No. CPPR- \_\_\_\_\_, Amendment No. \_\_\_\_\_ dated \_\_\_\_\_.
- ☐ Facility Operating License No. \_\_\_\_\_, Amendment No. \_\_\_\_\_, dated \_\_\_\_\_.
- ☐ Order Extending Construction Completion Date, dated \_\_\_\_\_.
- ☒ Other (Specify) Bi-weekly, notice covering period September 25, 1985. Expiration  
date for hearing requests and comments October 25, 1985.

Division of Licensing, ORB#1  
Office of Nuclear Reactor Regulation

Enclosures:  
As stated

cc:

OFFICE	ORB#1:DL	CP					
SURNAME	CParrish;ps						
DATE	10/15/85						

