

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

January 30, 1985
AEP:NRC:0906B

Donald C. Cook Nuclear Plant
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
SUPPLEMENTAL RESPONSE TO NRC
REPORT NOS. 50-315/84-13 (DRS); 50-316/84-15 (DRS)

Mr. James G. Keppler
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

As discussed with Mr. W. Little and others of your staff on January 8, 1985, we are providing the following as a supplement to our response (AEP:NRC:0906, dated November 29, 1984) to the subject inspection report.

SUPPLEMENTAL RESPONSE TO ITEM 3.b

We have drafted a procedure that:

- o Defines the actions necessary to document valve failures by the ISI Section.
- o Defines the mechanics used to evaluate valve failures.

This procedure is currently being reviewed and is targeted for approval by March 15, 1985. This commitment supersedes the commitment in letter AEP:NRC:0906, Response 3.b.3 to proceduralize an interim measure for documenting valve failures.

As addressed in AEP:NRC:0906, an assessment of our valve program is to be completed by February 15, 1985. The assessment should determine the program modifications that are needed to address tracking of valve failure rates and trending activities. We will provide a written description of the results of the assessment by April 1, 1985. The description will discuss the modifications which will be incorporated into our valve program and a target date when the modifications will be incorporated.

The assessment, which has started, is addressing the following concerns:

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- o The need for tracking valve failure rates for use in conjunction with a maintenance/replacement program.
- o The necessity of developing a formal matrix of identical valves to be used in assessing the potential failure of valves identical to one that has failed. As an additional interim measure, should a valve failure be identified, an expedited review will be performed to identify valves that are identical (physically the same, used in the same service, and made by the same manufacturer) to the failed valve. The identical valves will then be assessed to assure continued operability.

SUPPLEMENTAL RESPONSE TO ITEM 3.c(1)

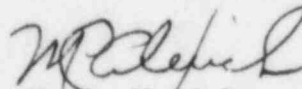
Controls are being established to assure that appropriate corrective actions are taken to restore valves prior to discontinuing increased surveillance frequency (i.e., removing the valve from the increased frequency list). Specifically, the draft procedure (addressed above in Item 3.b) defines the course of action that will be taken to address valves placed on increased frequency and to assure corrective action is taken, when necessary.

SUPPLEMENTAL RESPONSE TO ITEM 3.c(2)

Infrequently stroked valves which exceed the timing criteria of ASME XI paragraph IWV-3410 and have to be placed on increased frequency will be evaluated. This evaluation will consider both valve performance capability on a component level and safety system response time requirements. However, in all cases should a valve exceed its safety limit the valve will be declared inoperable and corrective action will be taken.

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

WGM
1-30-85

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Attachment

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