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October 21, 1985

AEP:NRC:0775AA

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Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316 *OL*
License No. DPR-74
SUPPLEMENT TO REQUEST FOR ENVIRONMENTAL
QUALIFICATION EXTENSION BEYOND NOVEMBER 30, 1985

Honorable Nunzio J. Palladino
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Palladino:

Pursuant to discussions with NRC staff, this letter supplements our letter AEP:NRC:0775W, dated September 30, 1985, concerning special administrative actions we have taken regarding Items 1 through 3 of that letter. Additional information for the Item 3 Justification for Continued Operation (Triax instrument cables for post-accident, high-range area radiation monitors) is also provided. We are also requesting withdrawal of our application for an environmental qualification extension beyond November 30, 1985 for the instruments listed in Item 4 of that letter.

For all equipment listed in Items 1-3, the Plant Operations Superintendent will issue a Standing Order to alert the operators that the equipment is not fully qualified for flooding following an accident, and that they must evaluate the validity of instrumentation readings should an accident of the type described occur. The control room instrumentation so affected is being identified. A list of suitable, qualified, alternative instrumentation is also being supplied to the plant operators.

The supplemental information for the Item 3 Justification for Continued Operation, which was prepared with the assistance of Westinghouse Electric Corporation, describes our methodology for using a sample drawn from the RHR sump recirculation should the Item 3 equipment fail and the RCS hot leg sample lines or containment sump sample line on the Post-Accident Sampling System portions of the PASS be unavailable. We believe the pathway we are describing fully meets the requirements of 10 CFR 50.49. This supplemental information is included as Attachment 1 to this letter.

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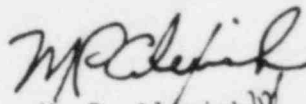
10-21-85

With regard to Item 4, a careful and detailed evaluation by our environmental qualification consultants, Engineering Planning and Management, Inc., indicated that the instrumentation listed under Item 4 of AEP:NRC:0775W can be qualified in accordance to the aging criteria of DOR Guidelines and Generic Letter 82-09. As a result of our own evaluation of the information, we have concluded that our request for an extension beyond November 30, 1985 can be withdrawn for this item. It is currently our intention to replace the Item 4 instruments during the forthcoming Unit 2 refueling outage with instrumentation qualified to 10 CFR 50.49.

We stated in our letter AEP:NRC:0775W that denial of the request for extension would result in a seven week maintenance outage. Since we are withdrawing Item 4 from our extension request, the length of a dedicated equipment replacement outage would be reduced to approximately 6 weeks.

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 10/21/85

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Attachment

cc: Thomas M. Roberts, Commissioner - Washington, D.C.
James K. Asselstine, Commissioner - Washington, D.C.
Frederick M. Bernthal, Commissioner - Washington, D.C.
Lando W. Zech, Jr., Commissioner - Washington, D.C.
James M. Taylor, Director, IE - Washington, D.C.
Harold R. Denton, Director - Washington, D.C.
John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman

ATTACHMENT 1 TO AEP:NRC:0775AA

SUPPLEMENTAL INFORMATION REGARDING THE JUSTIFICATION

FOR CONTINUED OPERATION FOR ITEM 3*

- * NOTE: This information was prepared in close cooperation with Westinghouse Electric Corporation, the original NSSS supplier for the Donald C. Cook Nuclear Plant and American Electric Power's consultant on Emergency Operating Procedures.

In our letter AEP:NRC:0775W, we noted that the Post-Accident Sampling System (PASS) could be used to perform the equivalent monitoring function of the high-range area radiation monitors. This system is designed in accordance with the requirements of NUREG-0737, but not in accordance with the requirements of 10 CFR 50.49. We also have available a method of performing the equivalent function of the area monitors VRA-2310 and VRA-2410, which we believe to be fully qualified in accordance with the requirements of 10 CFR 50.49. This method consists of using our containment area monitors VRA-2310 and VRA-2410 until such time as they may be rendered inoperable due to containment flooding. At that time, we will be able to draw a sample from our RHR recirculation pathway, which draws water from the containment sump and recirculates it to the emergency core cooling system and/or containment spray system, as required. We believe this method, which will only be used if more direct methods of using the RCS hot leg sample lines or containment sump sample line on the Post-Accident Sampling System portions of the PASS are not available, is fully qualified in accordance with the requirements of 10 CFR 50.49. Guidance has been transmitted to the plant staff for using this method in conjunction with the Emergency Operating Procedure.