

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	Docket Nos. 50-315
)	and 50-316
INDIANA AND MICHIGAN)	
ELECTRIC COMPANY)	
(Donald C. Cook, Nuclear)	
Station, Units 1 and 2))	

EXEMPTION

I.

The Indiana and Michigan Electric Company (the licensee) is the holder of Facility Operating Licenses Nos. DPR-58 and DPR-74 which authorize the operation of the Donald C. Cook Nuclear Station, Units Nos. 1 and 2 (the facilities), at reactor power levels not in excess of 3250 and 3411 megawatts thermal (rated power), respectively. The facilities are Westinghouse designed pressurized water reactors located at the licensee's site in Berrien County, Michigan.

The license is subject to all rules, regulations and orders of the Nuclear Regulatory Commission (the Commission) now or hereafter in effect.

II.

10 CFR Part 50.55a requires that piping and components of boiling and pressurized water reactor plants be examined and pressure tested to the requirements of Section XI of the ASME Code and that the examinations and tests be completed during each of four (4) ten-year intervals. These ten-year intervals are calculated from the start date of commercial operation of the facility.

10 CFR Part 50.55a(g)(4) requires that licensees update their inservice inspection (ISI) and pump and valve inservice (IST) programs to a newer

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edition of Section XI of the Code each ten years. Since the regulations require these updates based on the 10-year anniversary of facility commercial operation, multi-unit sites often find that each unit has an ISI and IST program structured for a slightly different edition of the Code.

By letter dated March 15 and subsequently modified by letter dated May 11, 1984, the licensee requested an exemption to the requirements to 10 CFR Part 50.55a(g)(4) which would allow the use of common start date for ISI and IST for both units.

According to the regulations, the second ten-year interval for the ISI and IST program should begin on August 23, 1985 and July 1, 1988 for D. C. Cook Units 1 and 2, respectively. The licensee has requested a common start date of July 1, 1986. The Commission's staff has reviewed this request and has determined that a common ISI and IST start date for two units has inherent administrative, technical, and cost saving advantages, both to the licensee and to the Commission. The staff has concluded that:

1. The same Code edition and addenda, by regulation, can be used as the basis for the ISI and IST program for both units;
2. Since the units are similar in design, only one ISI and IST program would have to be written and submitted by the licensee;
3. The Commission's staff would have to review and approve only one submittal instead of two;
4. The Commission's staff would have to inspect for compliance against only one program instead of two; and
5. The change of the ISI and IST start date to July 1, 1986, will not affect the completion schedule of examinations and pressure tests for the Units. However, some tests on Unit 2 will be conducted to

the first ten year interval criteria; relief granting these changes are the subject of separate Commission action.

The selected start date of July 1986 is basically two years prior to that which would normally be required by the regulations for D. C. Cook Unit 2 and one year later than required for Unit 1. Future program updates for Unit 1 will constitute update to a newer Code sooner than would normally be required. For Unit 2 the ISI and IST program will be in accordance with a slightly older edition of the Code than would have been required by the regulations, but the Commission's staff concludes that the use of a single ISI and IST program for both D. C. Cook Units is more beneficial in terms of net overall plant safety and both the older and newer editions of the Code provide acceptable standards for the ISI and IST program.

Therefore, the staff concludes that the exemption request should be granted. If a common start date were not established, the ISI and IST programs at D. C. Cook would be accomplished, for some period of time, to two different ASME Codes. Although administratively possible, this situation could contribute to increased personnel errors in the performance of inspection and testing requirements to two different versions of the Code. This can create a substantial and additional administrative workload for what can be described as only nominal technical differences in the inspection and testing requirements.

IV.

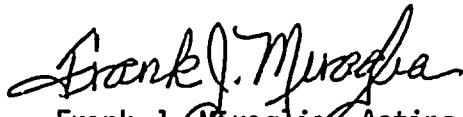
Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12(a), the exemption requested by the licensee's letter of May 11, 1984 is authorized by law, and will not endanger life or property or the common defense and security, and is otherwise in the public interest. The

Commission hereby grants to the licensee an exemption from the requirements of 10 CFR 50.55a(g)(4).

Pursuant to 10 CFR 51.32, the Commission has determined that the issuance of the exemption will have no significant impact on the environment (49 FR 47666)

This Exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


for Frank J. Miraglia, Acting Director
Division of Licensing
Office of Nuclear Regulation

Dated at Bethesda, Maryland
this 29th day of November 1984



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