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 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
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 HERING, R.F. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Provides info requested by NRC, including justification of quality of Rosemount RdF resistance temp detectors being replaced & history of actions re RdF Corp resistance temp detectors.

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INDIANA & MICHIGAN ELECTRIC COMPANY

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August 8, 1985
AEP:NRC:0942C

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
STATUS REPORT AND PLANS CONCERNING THE IMPACT
OF R&F RTDs ON D. C. COOK UNIT NOS. 1 AND 2

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

References:

- 1) Letter from E. P. Rahe, Jr., of the Westinghouse Electric Corporation to Mr. Cecil O. Thomas of the NRC dated May 6, 1985, identifier NS-NRC-3034.
- 2) Letter from M. P. Alexich of American Electric Power Service Corporation to Mr. H. R. Denton of the NRC dated July 30, 1985, identifier AEP:NRC:0942A.

Dear Mr. Denton:

This letter is to provide information requested by your staff in a telephone conversation of July 30, 1985. Specifically, they requested 1) a justification of the quality of the R&F resistance temperature detectors (RTDs) relative to the Rosemount RTDs that they are replacing, and 2) a history of AEPSC actions associated with the RTDs manufactured by R&F Corporation.

To address the first part of the above question, we would point out that the instruments currently being installed are high-quality instruments needed to meet the requirements of 10 CFR 50.49. The R&F RTD accuracy included an allowance for calibration and drift consistent with the Westinghouse qualification program. The calibration issue had no connection with the quality, sensitivity, or inherent accuracy of the instruments. Rather, it was simply found that the factory calibration of the instruments did not correspond to the Westinghouse specifications and the values used in the safety analysis. R&F and Westinghouse have, through recalibration of the RTDs and recommendations on the cross-calibration technique, reallocated the total RTD allowance to be consistent with original safety analysis assumptions for R&F RTDs.

The remainder of this letter addresses the recent history of the R&F RTD-related actions which led to our request for the Technical Specification change (cited in Reference 2) resulting from the impact of RTD allowances.

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Westinghouse, our NSSS vendor, notified the D. C. Cook Plant on May 2, 1985, that they had found an error in their calibration technique for RdF RTDs. The calibration performed by RdF on its RTDs was not compatible with Westinghouse specifications. Westinghouse has informed the NRC of the status of its investigations of RTD calibration anomalies in Westinghouse-supplied RdF RTDs (Letter No. NS-NRC-85-3034). A Westinghouse/customer meeting was held on this subject on May 9, 1985.

AEPSC had purchased four RdF RTDs from Westinghouse, and later purchased 32 RTDs directly from RdF. The RTDs purchased from Westinghouse were installed prior to the May 9, 1985 meeting. Two each were installed in Unit 1 and Unit 2 of the D. C. Cook Plant. It should be noted that as part of our current refueling outage activities, we plan to install 14 additional RdF RTDs in Unit 1 prior to the startup of Cycle 9.

At the time we were notified of the error by Westinghouse, Unit 1 of the D. C. Cook Plant was in a refueling outage. Present information indicates that the two RdF RTDs installed on this unit were not used for operation. On Unit 2, the RdF RTDs are installed as spares and are currently tagged as out of service. This means that they cannot currently be used for safety functions.

The DNB transient analyses for Donald C. Cook Unit 1 were performed at 3411 MWt, even though the rated thermal power is 3250 MWt. This difference represents a margin of approximately 5% in power. Using a sensitivity of 1°F/1% power, as suggested to us by Westinghouse, this would indicate that an unused temperature margin of 5°F was available. 5°F is significantly larger than the largest temperature error that we were made aware of at the May 9 Westinghouse meeting. On this basis, we believed that no Technical Specification (T/S) changes would be required for Unit 1.

Telephone conferences on June 18 and 19 with Westinghouse Electric Corporation indicated that the above approach may not be acceptable because of the impact on the LOCA analysis which was recently reperformed and transmitted to you on July 23. When used to ensure LOCA conformance, the principal effect of the RdF RTD error would be to induce a larger-than-assumed error in the primary flow. A second problem is associated with the method by which RTD errors are used in the other safety analyses. The overpower and overtemperature ΔT setpoints are set based on design thermal power rather than the rated thermal power at which the plant is allowed to operate. As a result of these telephone conferences, it became apparent that we would have to reconsider our initial decision that T/S changes would be unnecessary.

the 1990s, the number of people in the United States who are 65 years of age or older has increased by 50 percent, and the number of people 75 years of age or older has increased by 100 percent. The number of people 85 years of age or older has increased by 200 percent. The number of people 95 years of age or older has increased by 400 percent. The number of people 100 years of age or older has increased by 1,000 percent. The number of people 105 years of age or older has increased by 2,000 percent. The number of people 110 years of age or older has increased by 4,000 percent. The number of people 115 years of age or older has increased by 8,000 percent. The number of people 120 years of age or older has increased by 16,000 percent. The number of people 125 years of age or older has increased by 32,000 percent. The number of people 130 years of age or older has increased by 64,000 percent. The number of people 135 years of age or older has increased by 128,000 percent. The number of people 140 years of age or older has increased by 256,000 percent. The number of people 145 years of age or older has increased by 512,000 percent. The number of people 150 years of age or older has increased by 1,024,000 percent. The number of people 155 years of age or older has increased by 2,048,000 percent. The number of people 160 years of age or older has increased by 4,096,000 percent. The number of people 165 years of age or older has increased by 8,192,000 percent. The number of people 170 years of age or older has increased by 16,384,000 percent. The number of people 175 years of age or older has increased by 32,768,000 percent. The number of people 180 years of age or older has increased by 65,536,000 percent. The number of people 185 years of age or older has increased by 131,072,000 percent. The number of people 190 years of age or older has increased by 262,144,000 percent. The number of people 195 years of age or older has increased by 524,288,000 percent. The number of people 200 years of age or older has increased by 1,048,576,000 percent. The number of people 205 years of age or older has increased by 2,097,152,000 percent. The number of people 210 years of age or older has increased by 4,194,304,000 percent. The number of people 215 years of age or older has increased by 8,388,608,000 percent. The number of people 220 years of age or older has increased by 16,777,216,000 percent. The number of people 225 years of age or older has increased by 33,554,432,000 percent. The number of people 230 years of age or older has increased by 67,108,864,000 percent. The number of people 235 years of age or older has increased by 134,217,728,000 percent. The number of people 240 years of age or older has increased by 268,435,456,000 percent. The number of people 245 years of age or older has increased by 536,870,912,000 percent. The number of people 250 years of age or older has increased by 1,073,741,824,000 percent. The number of people 255 years of age or older has increased by 2,147,483,648,000 percent. The number of people 260 years of age or older has increased by 4,294,967,296,000 percent. The number of people 265 years of age or older has increased by 8,589,934,592,000 percent. The number of people 270 years of age or older has increased by 17,179,869,184,000 percent. The number of people 275 years of age or older has increased by 34,359,738,368,000 percent. The number of people 280 years of age or older has increased by 68,719,476,736,000 percent. The number of people 285 years of age or older has increased by 137,438,953,472,000 percent. The number of people 290 years of age or older has increased by 274,877,906,944,000 percent. The number of people 295 years of age or older has increased by 549,755,813,888,000 percent. The number of people 300 years of age or older has increased by 1,099,511,627,776,000 percent. The number of people 305 years of age or older has increased by 2,199,023,255,552,000 percent. The number of people 310 years of age or older has increased by 4,398,046,511,104,000 percent. The number of people 315 years of age or older has increased by 8,796,093,022,208,000 percent. The number of people 320 years of age or older has increased by 17,592,186,044,416,000 percent. The number of people 325 years of age or older has increased by 35,184,372,088,832,000 percent. The number of people 330 years of age or older has increased by 70,368,744,177,664,000 percent. The number of people 335 years of age or older has increased by 140,737,488,355,328,000 percent. The number of people 340 years of age or older has increased by 281,474,976,710,656,000 percent. The number of people 345 years of age or older has increased by 562,949,953,421,312,000 percent. The number of people 350 years of age or older has increased by 1,125,899,906,842,624,000 percent. The number of people 355 years of age or older has increased by 2,251,799,813,685,248,000 percent. The number of people 360 years of age or older has increased by 4,503,599,627,370,496,000 percent. The number of people 365 years of age or older has increased by 9,007,199,254,740,992,000 percent. The number of people 370 years of age or older has increased by 18,014,398,509,481,984,000 percent. The number of people 375 years of age or older has increased by 36,028,797,018,963,968,000 percent. The number of people 380 years of age or older has increased by 72,057,594,037,927,936,000 percent. The number of people 385 years of age or older has increased by 144,115,188,075,855,872,000 percent. The number of people 390 years of age or older has increased by 288,230,376,151,711,744,000 percent. The number of people 395 years of age or older has increased by 576,460,752,303,423,488,000 percent. The number of people 400 years of age or older has increased by 1,152,921,504,606,846,976,000 percent. The number of people 405 years of age or older has increased by 2,305,843,009,213,693,952,000 percent. The number of people 410 years of age or older has increased by 4,611,686,018,427,387,904,000 percent. The number of people 415 years of age or older has increased by 9,223,372,036,854,775,808,000 percent. The number of people 420 years of age or older has increased by 18,446,744,073,709,551,616,000 percent. The number of people 425 years of age or older has increased by 36,893,488,147,419,103,232,000 percent. The number of people 430 years of age or older has increased by 73,786,976,294,838,206,464,000 percent. The number of people 435 years of age or older has increased by 147,573,952,589,676,412,928,000 percent. The number of people 440 years of age or older has increased by 295,147,905,179,352,825,856,000 percent. The number of people 445 years of age or older has increased by 590,295,810,358,705,651,712,000 percent. The number of people 450 years of age or older has increased by 1,180,591,620,717,411,303,424,000 percent. The number of people 455 years of age or older has increased by 2,361,183,241,434,822,606,848,000 percent. The number of people 460 years of age or older has increased by 4,722,366,482,869,645,213,696,000 percent. The number of people 465 years of age or older has increased by 9,444,732,965,739,290,427,392,000 percent. The number of people 470 years of age or older has increased by 18,889,465,931,478,580,854,784,000 percent. The number of people 475 years of age or older has increased by 37,778,931,862,957,161,709,568,000 percent. The number of people 480 years of age or older has increased by 75,557,863,725,914,323,419,136,000 percent. The number of people 485 years of age or older has increased by 151,115,727,451,828,646,838,272,000 percent. The number of people 490 years of age or older has increased by 302,231,454,903,657,293,676,544,000 percent. The number of people 495 years of age or older has increased by 604,462,909,807,314,587,353,088,000 percent. The number of people 500 years of age or older has increased by 1,208,925,819,614,629,174,706,176,000 percent. The number of people 505 years of age or older has increased by 2,417,851,639,229,258,349,412,352,000 percent. The number of people 510 years of age or older has increased by 4,835,703,278,458,516,698,824,704,000 percent. The number of people 515 years of age or older has increased by 9,671,406,556,917,033,397,649,408,000 percent. The number of people 520 years of age or older has increased by 19,342,813,113,834,066,795,298,816,000 percent. The number of people 525 years of age or older has increased by 38,685,626,227,668,133,590,597,632,000 percent. The number of people 530 years of age or older has increased by 77,371,252,455,336,267,181,195,264,000 percent. The number of people 535 years of age or older has increased by 154,742,504,910,672,534,362,390,528,000 percent. The number of people 540 years of age or older has increased by 309,485,009,821,345,068,724,781,056,000 percent. The number of people 545 years of age or older has increased by 618,970,019,642,690,137,449,562,112,000 percent. The number of people 550 years of age or older has increased by 1,237,940,039,285,380,274,899,124,224,000 percent. The number of people 555 years of age or older has increased by 2,475,880,078,570,760,549,798,248,448,000 percent. The number of people 560 years of age or older has increased by 4,951,760,157,141,521,099,596,496,896,000 percent. The number of people 565 years of age or older has increased by 9,903,520,314,283,042,199,193,993,792,000 percent. The number of people 570 years of age or older has increased by 19,807,040,628,566,084,398,387,987,584,000 percent. The number of people 575 years of age or older has

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1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

2. Once the problem is identified, the next step is to define the objectives and goals of the project. This helps to clarify what needs to be achieved and provides a clear direction for the team.

3. The third step is to develop a plan or strategy to address the problem. This involves breaking down the problem into smaller, manageable tasks and determining the resources needed to complete them.

4. The fourth step is to implement the plan. This involves putting the strategy into action and monitoring progress to ensure that the project is on track.

5. The final step is to evaluate the results of the project. This involves assessing the outcomes against the objectives and goals and identifying any areas for improvement.

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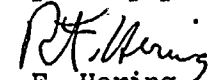
On June 21, 1985, a telephone conference was held with your staff to apprise you of the issues and to discuss the available options for Unit 1. We were not prepared to submit T/S changes at that time, because a considerable amount of effort remained in order to do the necessary evaluations to support such a submittal. In addition, there was still some uncertainty as to whether a T/S change would be requested due to the possibility of using the margin described above.

On June 19, Westinghouse was authorized to initiate a safety review of the impact of the Rdf calibration issue on Unit 1. The next few weeks were occupied with the process of defining the work that needed to be accomplished, data that needed to be transmitted to Westinghouse, and the collection and transmission of the required data. This included transmitting existing Rdf calculation curves and gathering data from the new Foxboro pressurizer pressure transmitters. In addition, the transmitter data had to be reviewed, and pertinent information was extracted prior to transmission. A procedure to perform a cross-calibration of the Rdf RTDs also had to be drafted, and necessary review initiated. Necessary equipment required for the cross-calibration test was defined in order to procure unavailable items.

Conversations were initiated with your staff in late July, once the necessary work had been completed to determine the schedule for performing the analysis to support a T/S change. On July 29, we were informed that such a T/S must be submitted on an expedited basis. This resulted in our submittal to you of July 30, 1985 (Reference 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,


R. F. Hering
Vice President

RBK
8/8/85

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For more information

contact the
authorities

Mr. Harold R. Denton

-4-

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