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 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Requests code relief extension for testing certain valves in inservice testing program. Response to request expected by 871211. Unit may be brought to at least hot shutdown to perform tests if relief not granted. Fee paid.

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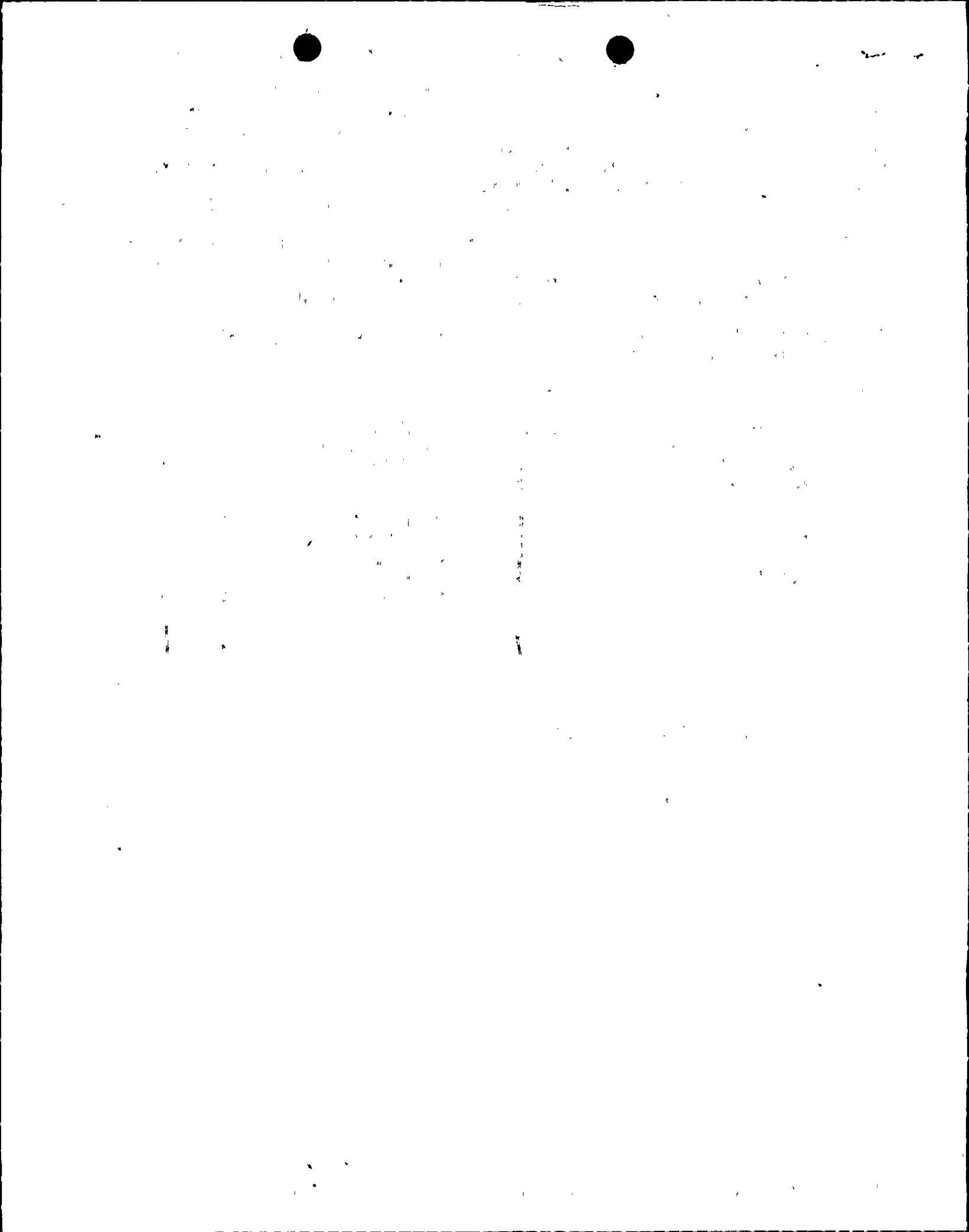
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AEP:NRC:0969I
10 CFR 50.55a(g)(6)(i)

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
INSERVICE TEST (IST) - REQUEST FOR CODE RELIEF
EXTENSION FOR RHR SYSTEM VALVES

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Attn: T. E. Murley

November 20, 1987

Dear Dr. Murley:

The purpose of this letter is to request a code relief extension for testing certain valves in the Inservice Testing (IST) Program. These valves, which are part of the Residual Heat Removal (RHR) System, are presently subject to quarterly testing in accordance with the ASME Boiler and Pressure Vessel Code, Section XI, 1983 Edition, Subsection IWV, Article IWV-3000. However, we believe that these valves cannot be full- or part-stroke exercised with the units operating without posing significant risks such as inadvertently actuating containment spray.

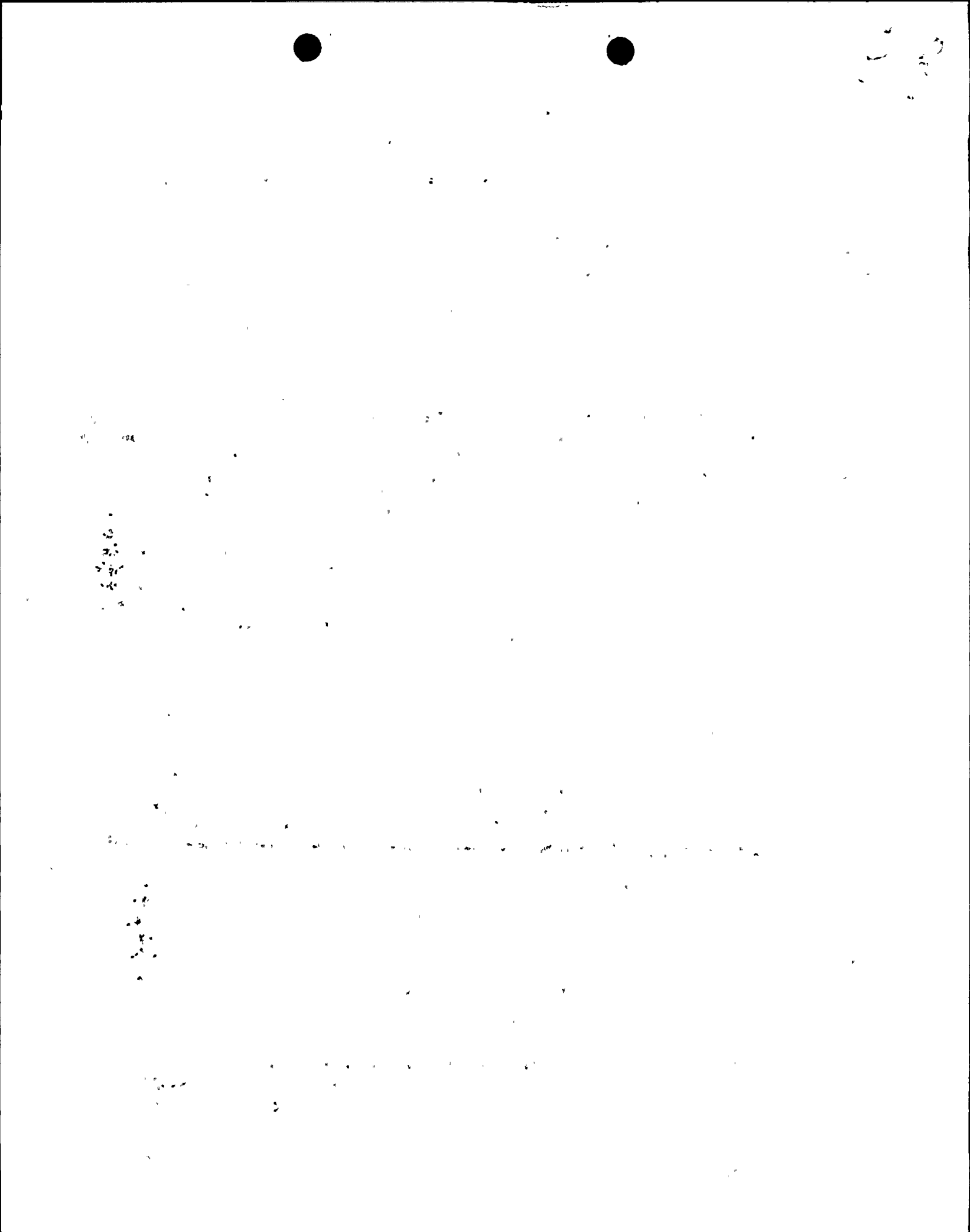
We request an extension of relief from the quarterly testing requirement. As an alternative, we propose to test the valves during the next refueling outage, or during intervening outages of sufficient duration when the plant is in a condition which would accommodate the tests. (In the event of frequent outages, however, testing will not be performed more often than once per 92 days.) The relief extension requested is temporary, and would expire once analyses supporting a plant configuration amenable to testing the valves with the units operating is submitted and approved.

The valves affected by this request are:

IMO-330 and IMO-331: Discharge lines from the outlet of the RHR heat exchangers for both the East and West RHR pumps going to the containment spray headers.

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IMO-340: Discharge from the East RHR pump (downstream of the heat exchanger) to the suction of the centrifugal charging pumps.

IMO-350: Discharge from the West RHR pump (downstream of the heat exchanger) to the suction of the safety injection pumps.

Background

Our letter AEP:NRC:0969B, dated October 31, 1986 requested permanent relief from the quarterly testing requirements of the ASME code. The relief was requested because of a change in the interpretation of the operability requirements of Technical Specification 3.5.2. Past testing methodology required closing the RHR cross-tie valves (IMO-314 and/or IMO-324), and thus limited RHR injection from a single pump to 2 loops. Under our present interpretation of operability, a single RHR pump must be able to deliver flow to all reactor coolant loops. As detailed in Attachment 1 of AEP:NRC:0969B, testing of the subject valves is not considered prudent with the RHR cross-tie valves open. Since it is unlikely that testing of the valves can be completed in one hour, testing with the cross-tie valves closed would result in commencement of a plant shutdown to fulfill the requirements of T/S 3.0.3.

In a safety evaluation report dated December 19, 1986 (Letter from B. J. Youngblood to John E. Dolan), the NRC granted relief from the quarterly testing requirements, but only until the next scheduled refueling outages. The relief was only granted temporarily because we were revising the accident analyses such that operation of the Cook Nuclear Plant units with the RHR cross-tie valves closed would be supported. These analyses were submitted in our letters AEP:NRC:1024, dated March 23, 1987, and AEP:NRC:1024A, dated May 13, 1987. However, as indicated in our letter AEP:NRC:1024C, dated October 13, 1987, we were informed by our analyst, Westinghouse Electric Corporation, that the analyses may be inadequate in that the review of the effect that closing the cross-tie valves has on containment long-term calculated pressure was not included. We are presently working with Westinghouse to resolve this issue. It will not be possible, however, to resolve this issue before the next quarterly testing, when unit shutdown might become necessary.

Date When Response is Needed

The relief for Unit 1 expired with the Cycle 9-10 refueling outage, which ended in October 1987. The valves were successfully tested during the refueling outage, and the next test is required

to be performed by December 13, 1987. Thus, we request that you respond to us by December 11, 1987. If we are not granted relief we may be required to bring the unit to at least hot shutdown to perform the tests. This could require an outage of up to four days, and thus constitute a burden to our customers.

Our present code relief for Unit 2 does not expire until the Unit 2, Cycle 6-7 refueling outage. This outage, which was scheduled for February 1988 when our present code relief was granted, has been rescheduled for May 1988. Since it is unclear at this time when analyses to support testing with the units operating will be completed, we request that the relief for Unit 2 also be extended until the analyses are submitted and approved. We note that the Unit 2 valves were successfully tested on October 7, 1987 during a surveillance outage.

Other Licensing Issues

Pursuant to the requirements of 10 CFR 170.12(c), we have enclosed a check in the amount of \$150.00 for the proposed code relief.

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

Sincerely,



M. P. Alexich
Vice President

cm

Attachment

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

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