Docket File

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

June 8, 1988

Docket Nos. 50-315 and 50-316

Mr. Milton P. Alexich, Vice President
Indiana Michigan Power Company
c/o American Electric Power Service
Corporation
1 Riverside Plaza
Columbus, Ohio 43216

Dear Mr. Alexich:

SUBJECT: SAFETY EVALUATION RELATED TO REQUEST FOR CONTINUED RELIEF EXTENSION FOR RHR SYSTEM VALVES (TACS NOS. 67794/67795)

By letter dated October 31, 1986, the Indiana Michigan Power Company (IMPC) requested permanent relief from the requirement to test Residual Heat Removal (RHR) valves IMO-330, -331, -340 and -350 quarterly. The request was made because the present test configuration would place the plant in an unanalyzed condition if these valves are tested during power operations.

The NRC responded to the above request by letter dated December 19, 1986, which transmitted a Safety Evaluation (SE). In that SE, the staff concluded that permanent relief from quarterly testing for these valves should not be granted and instead that an interim relief from quarterly testing should be granted until the next refueling outage for each unit. The interim relief was to allow IMPC additional time to reevaluate the Emergency Core Cooling System (ECCS) analysis for the unanalyzed condition and/or develop acceptable alternative testing methods.

By letter dated November 20, 1987, IMPC requested an extension of the interim relief until the ECCS reanalysis was completed. IMPC had completed part of the ECCS reanalysis, but needed more time to complete the last portion of this analysis pertaining to containment long-term pressure. The extension was needed because the interim relief for Unit 1 had expired with the refueling outage which occurred in October 1987, and the relief for Unit 2 would expire during the refueling outage scheduled for April 1988. No further relief was needed for Unit 2 since the outage will last for about a year to replace all four steam generators. By letter dated December 11, 1987, the NRC staff granted the requested relief for Unit 1 until June 30, 1988.

By letter dated January 18, 1988, IMPC provided the NRC staff with a proposed agenda and schedule for completing the containment long-term pressure analysis. IMPC indicated that it would provide the staff with a final analysis by March 31, 1988, as required by the staff's December 1987 code relief approval. In discussions with IMPC, the staff was informed that IMPC would also request approval of a program to reduce steam generator tube degradation in Unit 1 by reducing the plant's operating temperature and pressure. The accident analysis for long-term containment pressure associated with the reduced temperature and pressure program would make the March 1988 analysis concerning long-term containment pressure invalid. Therefore, to prevent reviewing an invalid analysis, the staff recommended that IMPC not submit the March 1988 analysis, and complete the final long-term containment pressure analysis with the new

8806160392 880608
PDR ADOCK 05000315
P PDR

reduced temperature and pressure figures on an expedited schedule.

By letter dated April 15, 1988, IMPC requested an extension of the interim code relief until the final analysis is completed. The extension is needed because the interim relief for Unit 1 will expire June 30, 1988. IMPC indicated the analysis will be submitted to NRC for review in September 1988, and therefore requested extension of the present code relief until January 31, 1989.

The NRC staff has reviewed the IMPC request for extension of the interim relief for Unit 1. Based on the previous staff evaluation of the original request for relief and additional discussion on alternative testing methods, the staff concludes that the interim relief should be extended to January 31, 1989, to provide time to complete the required analysis. However, IMPC should complete and submit the analysis results for staff review at least three months before the extension expires to allow sufficient time for the NRC review and appropriate action for future testing of the RHR valves. IMPC has, in fact, committed to submit the completed analysis in September 1988, which is four months before the extension expires.

In accordance with Technical Specification 4.0.5, written relief must be obtained from the Commission pursuant to 10 CFR 50.55a(g)(6)(i). Our review has determined that the code requirements for the specified systems are impractical, and the granting of the relief extension is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Therefore, the RHR valves designated IMO-330, IMO-331, IMO-340, IMO-350 for Unit 1 need not be tested during power operation until January 1989, provided that they will be tested at any intervening outage of sufficient duration when the plant is in a condition for tests to be performed. These valves are detailed in the April 15, 1987 IMPC letter and the enclosure.

The temporary relief is granted for Unit 1 until January 1989.

Sincerely,

Daniel R. Muller

Daniel R. Muller, Acting Director
Project Directorate III-1
Division of Reactor Projects - III, IV, V
& Special Projects

Enclosure:
Safety Evaluation

cc: w/enclosure
See next page

reduced temperature and pressure figures on an expedited schedule.

By letter dated April 15, 1988, IMPC requested an extension of the interim code relief until the final analysis is completed. The extension is needed because the interim relief for Unit 1 will expire June 30, 1988. IMPC indicated the analysis will be submitted to NRC for review in September 1988, and therefore requested extension of the present code relief until January 31, 1989.

The NRC staff has reviewed the IMPC request for extension of the interim relief for Unit 1. Based on the previous staff evaluation of the original request for relief and additional discussion on alternative testing methods, the staff concludes that the interim relief should be extended to January 31, 1989, to provide time to complete the required analysis. However, IMPC should complete and submit the analysis results for staff review at least three months before the extension expires to allow sufficient time for the NRC review and appropriate action for future testing of the RHR valves. IMPC has, in fact, committed to submit the completed analysis in September 1988, which is four months before the extension expires.

In accordance with Technical Specification 4.0.5, written relief must be obtained from the Commission pursuant to 10 CFR 50.55a(g)(6)(i). Our review has determined that the code requirements for the specified systems are impractical, and the granting of the relief extension is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Therefore, the RHR valves designated IMO-330, IMO-331, IMO-340, IMO-350 for Unit 1 need not be tested during power operation until January 1989, provided that they will be tested at any intervening outage of sufficient duration when the plant is in a condition for tests to be performed. These valves are detailed in the April 15, 1987 IMPC letter and the enclosure.

The temporary relief is granted for Unit 1 until January 1989.

Sincerely,

Original signed by

Daniel R. Muller, Acting Director
Project Directorate III-1
Division of Reactor Projects - III, IV, V
& Special Projects

Enclosure:
Safety Evaluation

cc: w/enclosure
See next page

DISTRIBUTION

DOCKET FILE	PD31 GRAY FILE	RINGRAM	OGC	JPARTLOW	LMARSH
NRC & LOCAL PDRs	GHOLAHAN	JSTANG	EJORDAN	ACRS (10)	

* See previous concurrence

PM:PD31	D:PD31	*EMEB	*OGC
JSTANG	DMULLER	LMARSH	
6/13/88	6/8/88	5/ /88	5/ /88

M 4/1/88

invalid analysis, the staff recommended that IMPC not submit the March 1988 analysis, and complete the final long-term containment pressure analysis with the new reduced temperature and pressure figures on an expedited schedule.

By letter dated April 15, 1988, IMPC requested an extension of the interim code relief until the final analysis is completed. The additional time is needed because the interim relief for Unit 1 will expire June 30, 1988. IMPC indicated the analysis will be submitted to NRC for review in September 1988, and therefore requested extension of the present code relief until January 31, 1989.

The NRC staff has reviewed the IMPC request for extension of the interim relief for Unit 1. Based on the previous staff evaluation of the original request for relief and additional discussion on alternative testing methods, the staff concludes that the interim relief should be extended to January 1989, to provide time to complete the required analysis. However, IMPC should complete and submit the analysis results for staff review at least three months before the extension expires to allow sufficient time for the NRC review and appropriate action for future testing of the RHR valves.

In accordance with Technical Specification 4.0.5, written relief must be obtained from the Commission pursuant to 10 CFR 50.55a(g)(6)(i). Our review has determined that the code requirements for the specified systems are impractical, and the granting of the relief extension is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Therefore, the RHR valves designated IMO-330, IMO-331, IMO-340, IMO-350 for Unit 1 need not be tested during power operation until January 1989, provided that they will be tested at any intervening outage of sufficient duration when the plant is in a condition for tests to be performed. These valves are detailed in the April 15, 1987 IMPC letter and the enclosure.

The temporary relief is granted for Unit 1 until January 1989.

Sincerely,

Daniel R. Muller, Acting Director
Project Directorate III-1
Division of Reactor Projects - III, IV, V
& Special Projects

Enclosure:
Safety Evaluation

cc: w/enclosure
See next page

Concur as changed
Note in letter & in SER.

DISTRIBUTION

DOCKET FILE	PD31 GRAY FILE	RINGRAM	OGC	JPARTLOW	LMARSH
NRC & LOCAL PDRs	GHOLAHAN	JSTANG	EJORDAN	ACRS (10)	

PM:PD31	D:PD31	EMEB	OGC	
JSTANG	DMULLER	LMARSH	APH	
5/13/88	5/ /88	5/17/88	5/23/88	

Mr. Milton Alexich
Indiana Michigan Power Company

Donald C. Cook Nuclear Plant

cc:
Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Mr. J. Feinstein
American Electric Power
Service Corporation
1 Riverside Plaza
Columbus, Ohio 43216

Attorney General
Department of Attorney General
525 West Ottawa Street
Lansing, Michigan 48913

Township Supervisor
Lake Township Hall
Post Office Box 818
Bridgeman, Michigan 49106

W. G. Smith, Jr., Plant Manager
Donald C. Cook Nuclear Plant
Post Office Box 458
Bridgman, Michigan 49106

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
7700 Red Arrow Highway
Stevensville, Michigan 49127

Gerald Charnoff, Esquire
Shaw, Pittman, Potts and Trowbridge
2300 N Street, N.W.
Washington, DC 20037

Mayor, City of Bridgeman
Post Office Box 366
Bridgeman, Michigan 49106

Special Assistant to the Governor
Room 1 - State Capitol
Lansing, Michigan 48909

Nuclear Facilities and Environmental
Monitoring Section Office
Division of Radiological Health
Department of Public Health
3500 N. Logan Street
Post Office Box 30035
Lansing, Michigan 48909