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SUBJECT: Responds to NRC request for plant-specific seismic verification plans for plant, per GL 87-02. R

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AEP:NRC:1040

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC GENERIC LETTER 87-02, VERIFICATION OF SEISMIC
ADEQUACY OF MECHANICAL AND ELECTRICAL EQUIPMENT IN
OPERATING REACTORS, UNRESOLVED SAFETY ISSUE (USI) A-46

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

Attn: T. E. Murley

Reference: SQUG letter to Mr. Lawrence C. Shao, NRC
Dated August 19, 1988

October 3, 1988

Dear Dr. Murley:

This letter responds to the NRC request for our plant-specific seismic verification plans for Donald C. Cook Nuclear Plant, consistent with the requirements of Generic Letter (GL) 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46."

A utility group, the Seismic Qualification Utility Group (SQUG), has been formed to formulate a generic implementation of the verification of seismic qualification of equipment as per the requirements of GL 87-02. American Electric Power Service Corporation is a member of this utility group and will implement the requirements of the NRC Generic Letter by using the methodology and criteria noted in the Generic Implementation Procedure (GIP) developed by SQUG.

On July 29, 1988, the NRC Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment developed by SQUG. The NRC letter to SQUG enclosing the SER requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. By letter dated August 19, 1988, to Mr. Shao, referenced above, SQUG clarified that the 60 days would expire on October 7, 1988.

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As members of SQUG, we have supported the many efforts on which the GIP is based. The SER endorses the methodology and criteria embodied in Revision 0 of the GIP subject to satisfactory resolution of a number of open issues and NRC comments. Actions by SQUG and its contractors to resolve the identified open issues and comments in accordance with the SQUG schedule presented at the August 10-11, 1988, meeting with the NRC staff were included with the SQUG letter to Mr. L. Shao dated August 19, 1988. This schedule projects completion of Revision 1 of the GIP in November 1988 and Revision 2 in the spring of 1989, contingent upon SQUG and NRC agreement on the resolution of the various open issues. Revision 2 of the GIP is the version that is scheduled to contain all of the information needed to implement the USI A-46 generic letter at SQUG member plants. The final NRC SER Supplement on Revision 2 of the GIP is anticipated by mid-1989.

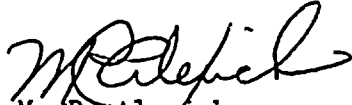
Indiana Michigan Power Company's schedule for implementation of the GIP at Cook Nuclear Plant is necessarily preliminary given the current status of and schedule for completion of Revision 2 of the GIP and NRC's SER supplement on that revision. However, it is our current plan to resolve USI A-46 for Cook Nuclear Plant by implementation of the generic criteria and methodology expected to be in Revision 2 of the GIP, as clarified by the SQUG responses to the NRC SER in SQUG letter to Mr. L. Shao dated September 22, 1988. Assuming no major changes in the work scope currently envisioned, and that the final NRC SER supplement, with no open items, is issued by the second quarter of 1989, the plant walkdown at Cook Nuclear Plant is expected to be completed by December 1992. This completion date would correspond to the end of the second refueling outage from the issuance date of the final SER by the NRC. Identification of safe shutdown equipment, gathering of necessary plant-specific data and training of our walkdown team members will be initiated prior to commencement of the walkdown.

Our current implementation plan and schedule to respond to USI A-46, as described above, are based on the "SQUG Commitments" identified in each section of the GIP. In addition, our implementation plan and schedule commitment is contingent upon our current understanding of the GIP. If the scope of the final revision of the GIP or the cost and effort required to implement it at our plant changes significantly from the current scope and cost estimates, we will reevaluate our commitments (i.e., the resolution of USI A-46 along with the resolution of numerous other related seismic issues, e.g., Eastern Seismicity, Seismic Margins, Severe Accident and Individual Plant External Event Evaluations). In view of the uncertainties in the requirements and schedule for resolution of these related issues, it may be necessary to revise the implementation schedule for USI A-46 at Cook Nuclear Plant to integrate these potential future requirements into a single, cost-effective program. This possibility has been the subject of on-going discussions between representatives of SQUG and your

staff, and further discussions are planned. We will advise you in writing of any changes in our implementation plan and schedule.

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

ldp

cc: D. H. Williams, Jr.
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
A. B. Davis
NRC Resident Inspector - Bridgman
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11/11/11