November 28, 1989

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: SUMMARY OF MEETING HELD ON NOVEMBER 8, 1989 WITH AMERICAN ELECTRIC POWER TO DISCUSS THE D.C. COOK IN-SERVICE TESTING PROGRAM.

On November 8, 1989, the staff met with AEP to readdress relief requests that were denied in the staff's August 29, 1989 safety evaluation (SE). Meeting attendees are listed in Enclosure 1. Slides used during the presentation (all non-proprietary) are provided as Enclosure 2.

AEP discussed those recommendations of the safety evaluation which they are planning to adopt and provided technical justification and clarification for the remaining issues in the safety evaluation. Resolution of the SE issues is discussed in the enclosed supplemental safety evaluation (Enclosure 3).

The staff requested that AEP resubmit their modified IST program by February 16, 1990 so that an approved program can be in place by April 1, 1990.

Sincerely,

Original signed by

Joseph G. Giitter, Project Manager
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

DISTRIBUTION
DOCKET FILE
NRC & LOCAL PDRs
PD31 GRAY FILE
JSNIEZEK
JTHOMA
JGIITTER
OGC
EJORDAN
ACRS(10)
JCLIFFORD
BJORGENSEN, SRI
BRUCE BURGESS, RIII
*See previous concurrence

**PM/PD31:DRSP	(A)D/PD31:DRSP	*EMEB
JGIITTER	JTHOMA	LMARSH
11/22/89	11/28/89	11/22/89

DF01
11

COOK IST MTG

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John F. Stang, Project Manager
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

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		EGB
PM/PD31:DRSP	(A)D/PD31:DRSP	EMEB
JGIITTER	JTHOMA	for LMARSH
11/22/89	11/ /89	11/22/89
		w/ comments

COOK IST MTG

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

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Joseph G. Giitter

Joseph G. Giitter, Project Manager
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

Mr. Milton Alexich
Indiana Michigan Power Company

Donald C. Cook Nuclear Plant

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

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Department of Attorney General
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Bridgman, Michigan 49106

Al Blind, Plant Manager
Donald C. Cook Nuclear Plant
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U.S. Nuclear Regulatory Commission
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Stevensville, Michigan 49127

Gerald Charnoff, Esquire
Shaw, Pittman, Potts and Trowbridge
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Washington, DC 20037

Mayor, City of Bridgman
Post Office Box 366
Bridgman, 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

ENCLOSURE 1

NAME	TITLE	ORGANIZATION
Steve Brewer	Manager, NS & L	AEPSC
Edward V. Gilabert	Engineer, Tech Support	AEPSC
Dilip Vadodaria	Piping & Valves Nuclear Engineering	AEPSC
Thaddeus R. Stephens	Production Supervising Engineer	D C COOK
Jeff St. Amand	Mechanical Performance Supervisor	D C COOK
Byron Bradley	Tech Eng - IST Perf Eng	D C COOK
Donna J. Moeller	NS & L Nuclear Engineer III	AEPSC
John Huang	MEB	NRR
Joseph G. Giitter	Project Manager	NRR/NRC
Ted Sullivan	Section Chief, EMEB	NRC/NRR/EMEB

SER FOR DONALD C. COOK NUCLEAR PLANT INSERVICE TESTING (IST) FOR PUMPS AND VALVES

- o SER ISSUES NO LONGER IN CONTENTION
- o APPENDIX C OF SER
  - INCLUDING GL 89-04 DISCUSSION
- o ADDITIONAL TECHNICAL JUSTIFICATION FOR SER ISSUES STILL IN CONTENTION

ISSUES NO LONGER IN CONTENTION

PP-31N AND -31S - SPENT FUEL PIT COOLING PUMPS

<u>ISSUE</u>

DENIED RELIEF FROM THE FLOW MEASUREMENTS

- COMPLY WITH THE SER

- INSTALL INSTRUMENTATION

  TENTATIVE COMPLETION DATE
  JANUARY 31, 1990

ISSUES NO LONGER IN CONTENTION

MS-108-2 AND -108-3 - MAIN STEAM-TO-TDAFP CHECK VALVE

<u>ISSUE</u>

o CONDITIONALLY GRANTED RELIEF

- VALVE CLOSURE VERIFIED BY DISASSEMBLY IN ACCORDANCE WITH GL 89-04

NOTE: FULL STROKE TO THE OPEN POSITION ON A COLD SHUTDOWN FREQUENCY

- PROGRAM NOTE REVISION

ISSUES NO LONGER IN CONTENTION

ESW-109 (145), -115 (240), AND -243

ISSUE

DENIED RELIEF REQUESTED FROM THE REQUIREMENT TO QUARTERLY EXERCISE THE VALVES TO THE OPEN POSITION

- TEST ON A COLD SHUTDOWN FREQUENCY
- PROGRAM NOTE REVISION

APPENDIX C

1) IDENTIFY NOTES AS COLD SHUTDOWN JUSTIFICATION OR RELIEF REQUEST

- REVISION TO PROGRAM NOTES

NOTE

FW-134 AND FW-135 (COLD SHUTDOWN JUSTIFICATION):

THESE VALVES ARE LOCATED ON THE SUCTION AND DISCHARGE LINES OF THE TURBINE DRIVEN AUXILIARY FEEDPUMP. THE MAXIMUM FLOW RATE THROUGH THE TURBINE DRIVEN AUXILIARY FEEDPUMP DURING IST IS APPROXIMATELY 700 GPM USING THE PUMP TEST LINE. PASSING THE DESIGN FLOW OF 900 GPM THROUGH THESE VALVES WOULD REQUIRE DELIVERING COLD AUXILIARY FEEDWATER WATER TO THE STEAM GENERATORS. THIS WOULD RESULT IN THERMAL SHOCK TO THE STEAM GENERATOR NOZZLES. THEREFORE, THESE VALVES WILL BE PART STROKE EXERCISED QUARTERLY AND FULL STROKE EXERCISED (PASSING DESIGN FLOW OF 900 GPM THROUGH THE VALVES) AT A COLD SHUTDOWN FREQUENCY.

APPENDIX C

2) FAST ACTING VALVES

- REVISION TO PROGRAM - MAXIMUM LIMITING STROKE TIMES OF UP TO TWO SECONDS

APPENDIX C

3) TESTING BY DISASSEMBLY - GL 89-04

- PROPOSED CHANGE TO PROGRAM

NOTE

THE RELIEF REQUEST NOTES WILL INDICATE WHEN ALTERNATIVE TESTING IS TO BE PERFORMED ON A CHECK VALVE PER GL 89-04, ITEM #2, IN LIEU OF THE STROKE TESTING REQUIRED BY SECTION XI, PARAGRAPH IWV 3521.

ALTERNATIVE TESTING WILL BE ACCOMPLISHED BY DISASSEMBLY OR RADIOGRAPHY DURING REFUELING OUTAGES. THESE METHODS ARE EXPLAINED BELOW:

(A) DISASSEMBLY METHOD - THE VALVE BONNET WILL BE REMOVED, THE DISC MANUALLY FULL STROKE EXERCISED AND THE VALVE INTERNALS VISUALLY INSPECTED PER GL 89-04. THE RESULTS OF THIS TEST WILL BE DOCUMENTED.

(B) RADIOGRAPHY METHOD - THIS METHOD WILL BE USED AS AN ALTERNATIVE TESTING METHOD TO DETERMINE THE DISC POSITION UNDER NO FLOW OR REVERSE FLOW CONDITIONS (I.E., VALVE SEATED). THIS, IN CONJUNCTION WITH THE FULL FORWARD FLOW TESTING OF THE VALVE, CAN PROVIDE ASSURANCE THAT THE DISC IS FREE TO MOVE FROM FULL OPEN POSITION DURING FORWARD FLOW TO THE CLOSED POSITION WITH NO FLOW OR REVERSE FLOW CONDITIONS. THE RESULTS OF THIS TEST WILL BE DOCUMENTED.

APPENDIX C

4) FW-118-1, -2, -3, AND -4
   DISCUSSED LATER

5) FW-134 AND -135 FULL FLOW TESTING

   - PART STROKE QUARTERLY

   - FULL STROKE TEST ON A COLD SHUTDOWN
     FREQUENCY

APPENDIX C

6) CONTAINMENT ISOLATION VALVE TESTING

- DOCUMENT IN THE IST PROGRAM

7), 8) AND 9)

DISCUSSED LATER

APPENDIX C

10) NOTE 6 FOR SI-161

- DISCREPANCY WILL BE CORRECTED

11) RH-108E AND -108W

DISCUSSED LATER

APPENDIX C

12) XRV-221 AND -222

- NO REQUIRED FAIL SAFE POSITION

13) CRV-470

DISCUSSED LATER

14) ESW-109(145), -114(240) AND -243

DISCUSSED EARLIER

15) IMO-330, -331, -340 AND -350

- INCLUDE RELIEF REQUEST

APPENDIX C

16) ESW-111(141), -112(142), -113(143), AND -114(144)

NO RELIEF REQUEST REQUIRED

- ALL REQUIRED TESTS FOR SECTION XI ARE PERFORMED

- NOTE ON DISASSEMBLY

  RESPONSE TO IE BULLETIN 83-03

17) SPENT FUEL PIT COOLING PUMP FLOW MEASUREMENTS

DISCUSSED EARLIER

ISSUES STILL IN CONTENTION

FW-118-1, -2, -3, AND -4

FEEDWATER HEADER CHECK VALVES

ISSUE

DENIED RELIEF REQUESTED FROM QUARTERLY EXERCISING TO THE CLOSED POSITION

ADDITIONAL JUSTIFICATION

ALTERNATE TEST METHOD - DISASSEMBLY ON REFUELING OUTAGE FREQUENCY

- NO POSITION INDICATORS
- NOT-POSITIVE BACKSEAT VALVES

AT COLD SHUTDOWN - DISASSEMBLY COULD DELAY RETURN TO POWER

- DRAINING THE SG FEEDWATER HEADER
- MANUALLY LIFTING VALVE BONNET
- WHIP RESTRAINT DISASSEMBLY
- HEAVY, LARGE COMPONENT

ISSUES STILL IN CONTENTION

QRV-200 AND -251

NORMAL CHARGING CONTROL VALVES

ISSUE

DENIED RELIEF REQUESTED FROM FAIL SAFE TESTING AND STROKE TIMING REQUIREMENTS

ADDITIONAL JUSTIFICATION

STROKE TIMING

- NO LOCAL OR REMOTE POSITION INDICATOR

FAIL SAFE POSITION

- QRV-200 - NONE REQUIRED
- QRV-251 - FAIL OPEN
  - DISASSEMBLE THE AIR SUPPLY LINE

ISSUES STILL IN CONTENTION

<u>CRV-470</u> - LETDOWN HEAT EXCHANGER TEMPERATURE CONTROL VALVE

<u>ISSUE</u>

DENIED RELIEF REQUESTED FROM FAIL SAFE TESTING

<u>ADDITIONAL JUSTIFICATION</u>

FAIL SAFE TEST AT POWER TO CLOSE POSITION IMPRACTICAL

- WITH LETDOWN OUT OF SERVICE
  - PRESSURIZER LEVEL CONTROL CONCERNS
- WITH LETDOWN IN SERVICE
  - HIGH TEMPERATURE, WHICH CAUSES
    - FLASHING CAUSING POTENTIAL WATER HAMMER DAMAGE
    - LIFTING OF THE LETDOWN LINE SAFETY VALVES

FAIL SAFE TEST ON A COLD SHUTDOWN FREQUENCY

ISSUES STILL IN CONTENTION

SI-189

CONTAINMENT ISOLATION CHECK VALVE

ISSUE

DENIED RELIEF REQUESTED FROM EXERCISING VALVE TO OPEN POSITION

ADDITIONAL JUSTIFICATION

FULL STROKE ONLY POSSIBLE BY VALVE DISASSEMBLY

- FULL FLOW IS APPROXIMATELY 800 GPM
- 3/4-INCH TEST CONNECTION
- VALVE LOCATED INSIDE CONTAINMENT

PART STROKE TEST ON A COLD SHUTDOWN FREQUENCY

FULL STROKE VERIFIED BY VALVE DISASSEMBLY ON A REFUELING OUTAGE FREQUENCY

ISSUES STILL IN CONTENTION

RH-108E AND -108W

RHR PUMP DISCHARGE LINE CHECK VALVES

ISSUE

DENIED REQUEST TO TEST ON A COLD SHUTDOWN FREQUENCY

ADDITIONAL JUSTIFICATION

FULL STROKE AT POWER OPERATION NOT DESIRABLE

- DESIGN MODIFICATION TO EXISTING INSTRUMENTATION (0-1500 GPM) DESIGN FLOW 3000 GPM

- TWO-LOOP INJECTION CONFIGURATION

PART STROKE QUARTERLY

FULL STROKE ON A COLD SHUTDOWN FREQUENCY

ISSUES STILL IN CONTENTION

NSO-021, -022, -023 AND -024

REACTOR HEAD VENT VALVES

NSO-061, -062, -063 AND -064

PRESSURIZER VENT VALVES

ISSUE

DENIED RELIEF REQUESTED FROM REFUELING FREQUENCY, EXERCISING, STROKE TIMING, AND FAIL-SAFE TESTING REQUIREMENTS

ADDITIONAL JUSTIFICATION

PERFORM TESTING ON A COLD SHUTDOWN FREQUENCY WHEN RCS PRESSURE LESS THAN OR EQUAL TO 80 LBS