



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

SAFETY EVALUATION REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO THE INSERVICE TESTING PROGRAM AND REQUESTS FOR RELIEF  
D. C. COOK NUCLEAR STATION, UNITS 1 & 2  
DOCKET NOS. 50-315/316

1.0 INTRODUCTION

The Code of Federal Regulations, 10 CFR 50.55a(g), requires that inservice testing (IST) of ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda, except where specific written relief has been requested by the licensee and granted by the Commission pursuant to 10 CFR 50.55a(a)(3)(i), (a)(3)(ii) or (g)(6)(i). In requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety; (3) the conformance with certain requirements of the applicable Code edition and addenda is impractical for its facility.

The Regulation, 10 CFR 50.55a(a)(3)(i), (a)(3)(ii), and (g)(6)(i), authorizes the Commission to grant relief from these requirements upon making the necessary findings. The NRC staff's findings with respect to granting or not granting the relief requested as part of the licensee's IST Program are contained in the Safety Evaluation (SE) issued on the licensee's program.

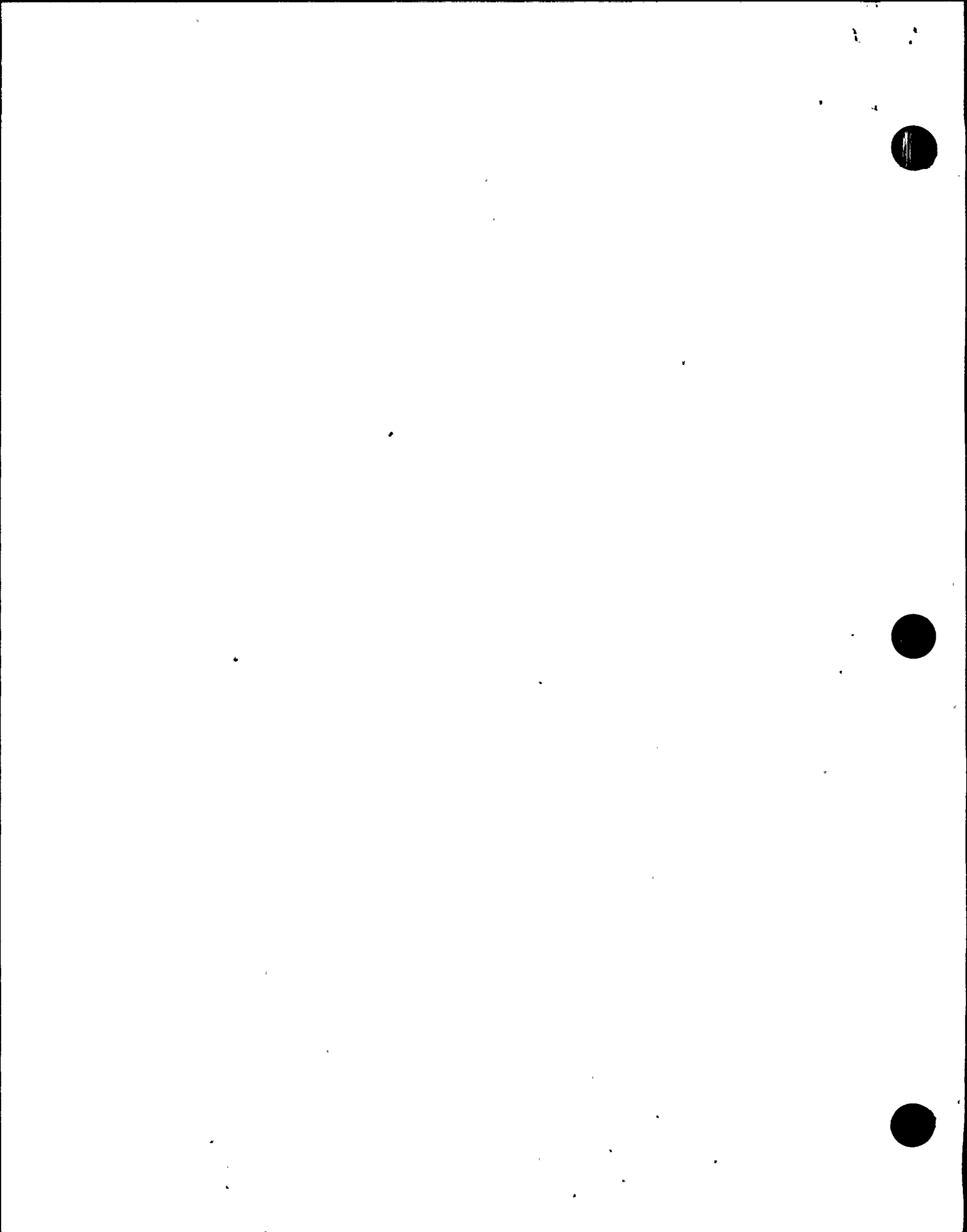
The IST program addressed in this report covers the second ten-year inspection interval from July 1, 1986 to July 1, 1996. The licensee's program includes pump IST program, Revision 1 and valve IST program, Revision 2, and is described in a letter dated October 5, 1987, which supersedes all previous submittals.

The program is based on the requirements of Section XI of the ASME Code, 1983 Edition through the Summer of 1983 Addenda.

2.0 EVALUATION

The IST program and the requests for relief from the requirements of Section XI have been reviewed by the staff with the assistance of its contractor, EG&G, Idaho, Inc. (EG&G). In addition, EG&G and staff members met with licensee representatives on July 14, and 15, 1987, in a working session to discuss questions resulting from the review. The Technical Evaluation Report (TER) provided as Attachment 1 is EG&G's evaluation of the licensee's inservice testing program and relief requests. The staff has reviewed the TER and concurs with the evaluations and conclusions

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contained in the TER. A summary of the pump and valve relief request determinations is presented in Table 1. The granting of relief is based upon the fulfillment of any commitments made by the licensee in its basis for each relief request and the alternative proposed testing.

Seven relief requests were denied (TER Sections 3.2.1.1, 4.1.1.1, 4.3.1.1, 4.4.1.1, 4.6.2.1, 4.6.2.2, and 4.7.1.1), two relief requests were partially denied (4.6.1.3 and 4.8.1.1) and seven relief requests were granted with certain conditions (TER Sections 4.2.1.1, 4.7.3.1, 4.11.1.1, 4.11.1.4, 4.12.1.1, 4.12.2.1 and 4.15.1.1). The licensee should refer to the specific TER section for a detailed discussion of these cases. These denials and conditions are listed in the TER Appendix C and in addition, Appendix C lists other IST program anomalies which were identified during the review.

The licensee should resolve all the items listed in Appendix C in accordance with the staff positions. Required program changes should be made within 90 days of receipt of this SER.

### 3.0 CONCLUSION

Based on the review of the licensee's IST program and relief requests, the staff concludes that the IST program as evaluated and modified by this SER will provide reasonable assurance of the operational readiness of the pumps and valves covered by the IST program to perform their safety related functions. The staff has determined that granting relief, pursuant to 10 CFR 50.55a(a)(3)(i), and (g)(6)(i), is authorized by law and will not endanger life or property, or the common defense and security and is otherwise in the public interest. In making this determination, the staff has considered the alternate testing being implemented, and the impracticality of performing the required testing considering the burden if the requirements were imposed. The last column of Table 1 identifies the regulation under which the requested relief is granted.

During the review of the licensee's inservice testing program, the staff has identified certain misinterpretations or omission of Code requirements. These items are summarized in the TER Appendix C. The IST program for D. C. Cook, Units 1 and 2 through a submittal dated October 5, 1987, is acceptable for implementation provided that the items noted above are corrected promptly. Relief requests contained in any subsequent revisions may not be implemented without prior approval by NRC.