# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9103060181 DOC.DATE: 91/02/28 NOTARIZED: NO DOCKET #
FACIL:50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
AUTH.NAME AUTHOR AFFILIATION
ALEXICH,M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
RECIP.NAME RECIPIENT AFFILIATION
MURLEY,T.E. Document Control Branch (Document Control Desk)

SUBJECT: Revises 891229 response to Generic Ltr 89-10, "Motor-Operated Valve Test Program." Inadvertent mispositioning during design basis FSAR will be considered even if mispositioning addressed by existing design basis.

DISTRIBUTION CODE: A064D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 7
TITLE: Response to Generic Ltr 89-10, "Safety-Related MOV Testing & Surveill

NOTES:

| | RECIPIENT ID CODE/NAME | COPIES LTTR | COPIES ENCL | RECIPIENT ID CODE/NAME | COPIES LTTR | COPIES ENCL |
|---|---|---|---|---|---|---|
| | PD3-1 LA | 1 | 0 | PD3-1 PD | 1 | 1 |
| | COLBURN,T. | 1 | 1 | | | |
| INTERNAL: | BAER,B RES | 1 | 1 | NRR/DET/EMEB 7E | 1 | 1 |
| | NRR/LPEB/BC | 1 | 1 | REG FILE | 1 | 1 |
| | RES/DSIR/EIB/B | 1 | 1 | | | |
| EXTERNAL: | NRC PDR | 1 | 1 | NSIC | 1 | 1 |

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 10 ENCL 9

RIDS/ADDS

RIDS/ADDS

Indiana Michigan
Power Company
P.O. Box 16631
Columbus, OH 43216

INDIANA MICHIGAN POWER

AEP:NRC:0966M

Donald C. Cook Nuclear Plant Units 1 and 2
License Nos. DPR-58 and DPR-74
Docket Nos. 50-315 and 50-316
GENERIC LETTER 89-10 MOTOR-OPERATED VALVE TEST PROGRAM

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

Attn: T. E. Murley

February 28, 1991

Dear Dr. Murley:

In accordance with a commitment made in our letter AEP:NRC:09660 dated January 25, 1991, the purpose of this letter is to outline revisions to our original response to Generic Letter 89-10 (AEP:NRC:0966F dated December 29, 1989) and our Generic Letter 89-10 program. These revisions are contained in the attachment to this letter and are shown in bold print and vertically barred in the right margin.

This letter is submitted pursuant to 10CFR50.54(f) and, as such, an oath is enclosed.

Sincerely,

M. P. Alexich
Vice President

ldp

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
A. B. Davis - Region III
NRC Resident Inspector - Bridgman
NFEM Section Chief



A064
1/1

ATTACHMENT TO AEP:NRC:0966M

REVISIONS TO GENERIC LETTER 89-10 RESPONSE

This attachment describes differences between our original response to Generic Letter 89-10 (AEP:NRC:0966F dated December 29, 1989) and the program for implementing the generic letter requirements developed subsequent to the original submittal.

1) Generic Letter 89-10 Item a.

Generic Letter Text

"Review and document the design basis for the operation of each MOV. This documentation should include the maximum differential pressure expected during both the opening and closing of the MOV for both normal operations and abnormal events, to the extent that these MOV operations and events are included in the existing approved design basis."

Original Response

"A review of motor-operated valves (MOVs) at Cook Nuclear Plant will be performed to establish which MOVs will be included in the program per Generic Letter 89-10. A design basis review will be performed on all MOVs included in the scope of Generic Letter 89-10. The review will be based on the existing approved design basis. For example, the emergency core cooling system design basis includes conditions of single active component failure. Therefore, inadvertent MOV mispositioning is already addressed by the existing design basis of the emergency core cooling system for the Cook Nuclear Plant."

Revision

**Inadvertent mispositioning during design basis FSAR events will be considered regardless of whether the mispositioning is addressed by the existing design basis. This is consistent with the position taken by the NRC in Supplement 1 to Generic Letter 89-10 (pp. 11-13) and constitutes an additional consideration to the above original response.**

2) Generic Letter 89-10 Item c.

Generic Letter Text

"Individual MOV switch settings should be changed as appropriate, to those established in response to item b. Whether the switch settings are changed or not, the MOV should be demonstrated to be operable by testing it at the design basis differential pressure and/or flow determined in response to item a. Testing MOVs at design basis conditions is not recommended where such testing is precluded by the existing plant configuration. An explanation should be documented for any cases where testing with the design basis differential pressure or flow cannot practicably be performed. This

explanation should include a description of the alternatives to design basis differential pressure testing or flow testing that will be used to verify the correct settings. . . .

Each MOV should be stroke tested, to verify that the MOV is operable at no-pressure or no-flow conditions even if testing with differential pressure or flow cannot be performed."

Original Response

"The MOV testing and surveillance program, as a minimum, will require that each MOV receive an as-found stroke test with diagnostic equipment attached at no-pressure or no-flow conditions, be refurbished in accordance with Plant Maintenance Procedures, and receive an as-left stroke test at no-pressure or no-flow conditions. Testing at design basis differential pressure and/or flow will be performed where practical (see item f). An explanation will be documented describing alternatives to design basis testing that will be used. To determine the testing schedule, each MOV in the program will be prioritized. The following is a preliminary list of priorities:

Priority 1: MOVs that are critical to safety (IEB 85-03) and MOVs which have demonstrated maintenance or operational problems.

Priority 2: High differential pressure MOVs in safety-related systems.

Priority 3: Environmentally qualified MOVs not included in Priorities 1 or 2.

Priority 4: MOVs in safety-related systems not in Priorities 1, 2, or 3.

Priority 5: Balance of Plant (BOP) MOVs that we consider important to safety."

Revision

The statement in the original response regarding refurbishment should be clarified. Thus, the original response is being revised to read as follows:

"The MOV testing and surveillance program, as a minimum, will require that each MOV receive an as-found stroke test with diagnostic equipment attached at no-pressure or no-flow conditions, be refurbished in accordance with Plant Maintenance Procedures when such refurbishment is necessary, and receive an as-left stroke test at no-pressure or no-flow conditions.

Testing at design basis differential pressure and/or flow will be performed where practical (see item f). An explanation will be documented describing alternatives to design basis testing that will be used. To determine the testing schedule, each MOV in the program will be prioritized. The following is a preliminary list of priorities:

Priority 1: MOVs that are critical to safety (IEB 85-03) and MOVs which have demonstrated maintenance or operational problems.

Priority 2: High differential pressure MOVs in safety-related systems.

Priority 3: Environmentally qualified MOVs not included in Priorities 1 or 2.

Priority 4: MOVs in safety-related systems not in Priorities 1, 2, or 3.

Priority 5: Balance of Plant (BOP) MOVs that we consider important to safety."

3) Generic Letter 89-10 Item i.

Generic Letter Text

"Each licensee with an operating license (OL) should complete all design basis reviews, analyses, verifications, tests and inspections that have been instituted in order to comply with items a through h within 5 years or three refueling outages of the date of this letter, whichever is later. Each licensee with a construction permit (CP) should complete these actions within five years of the date of this letter or before the OL is issued, whichever is later."

Original Response

"The design basis reviews, analyses, verifications, tests and inspections for the Generic Letter 89-10 program will be completed per the following schedule:

- Design basis reviews, diagnostic stroke testing and representative design basis pressure and/or flow testing for all Priority 1, 2 and 3 valves will be completed in three refueling outages or five years, whichever is later.

- Design basis reviews, diagnostic stroke testing and representative design basis pressure and/or flow testing for all Priority 4 and 5 valves will be completed by the

end of the outages corresponding to the end of the second ten-year ASME Section XI ISI/IST interval for Cook Nuclear Plant, about mid-1996."

Revision

Consistent with the NRC's "two-stage approach," switch settings will be based on the best data available and we will work to obtain applicable test data as soon as possible. The following revised reponse incorporates NRC comments on our original response that were provided in a letter from T. G. Colburn (NRC) dated November 1, 1990.

"The design basis reviews, analyses, verifications, tests and inspections for the Generic Letter 89-10 program will be completed per the following schedule:

- Design basis reviews and diagnostic stroke testing for all Priority 1 through 5 valves and representative design basis pressure and/or flow testing for all Priority 1, 2 and 3 valves will be completed in three refueling outages or five years, whichever is later.

- Representative design basis pressure and/or flow testing for all Priority 4 and 5 valves will be completed by the end of the outages corresponding to the end of the second ten-year ASME Section XI ISI/IST interval for Cook Nuclear Plant, about mid-1996."

STATE OF OHIO)
COUNTY OF FRANKLIN)

Milton P. Alexich, being duly sworn, deposes and says that he is the Vice President of licensee Indiana Michigan Power Company, that he has read the foregoing Response to GENERIC LETTER 89-10 MOTOR-OPERATED VALVE TEST PROGRAM and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

M P Alexich

Subscribed and sworn to before me this 28th

day of February, 1991.

Rita D. Hill
NOTARY PUBLIC

RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-28-94