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RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards marked up table,provided as attachment to 881005 ltr,reflecting relaxation of qualification requirements of accumulator level & pressure monitoring instrumentation from Reg Guide 1.97 Category 2 to Category 3.

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INDIANA MICHIGAN POWER

AEP:NRC:0773AP

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
REGULATORY GUIDE 1.97 ACCUMULATOR VOLUME AND PRESSURE

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

Attn: W. T. Russell

April 29, 1994

Dear Mr. Russell:

This letter is in regard to the Safety Evaluation (SE) performed on relaxing the qualification requirements of accumulator level and pressure monitoring instrumentation, from Regulatory Guide 1.97 Category 2 to Category 3, prepared and distributed by your staff in a letter to Indiana Michigan Power Company, dated November 17, 1993. That letter, further, requested that you be notified of the actions we plan to take and our schedule for implementation.

At this time our intended actions, which are completed with this submittal, are to remove these instruments from our environmental qualification (EQ) program and to change the qualification requirements of these instruments from Category 2 to Category 3 on the table that was provided to you as an attachment to our letter AEP:NRC:0773AB, dated October 5, 1988. A marked up copy of that table, margin-marked for quick reference, is provided as an attachment to this letter. As to future action(s), while these instruments will be maintained on their current surveillance/calibration frequency, they will not be changed out unless they fail or become a high maintenance problem, at which time we would most likely opt to substitute instruments that meet Regulatory Guide 1.97 Category 3 qualification requirements.

Sincerely,

for E. E. Fitzpatrick
Vice President

eh

060016

A001
1/1

Attachment

cc: A. A. Blind
G. Charnoff
J. B. Martin - Region III
NFEM Section Chief
NRC Resident Inspector
J. R. Padgett

Attachment to AEP:NRC:0773AP

MARKED UP COPY OF AEP:NRC:0773AB AND
REVISED PAGE OF SAME LETTER

Type D Variables: "those variables that provide information to indicate the operation of individual safety systems and other systems important to safety. These variables are to help the operator make appropriate decisions in using the individual systems important to safety in mitigating the consequences of an accident." Note: The schedule and status for each instrument is for when all the applicable recommendations of Regulatory Guide 1.97 Rev. 3 will be met.

Item No.	Purpose	Variable	Cat.	Tag Nos	Range	E Q	S Q	Q A	S F	P S	Display Location	Remarks/Action Req'd	U-1 Schedule	U-2 Schedule
D-1	RHR system	RHR system flow	2	IFI-310,311 320,321	0-1500 GPM 1500-5000 GPM	A	NA	A	NA	NA	Control Room Panel RHR	No action required See footnotes (jj) & (mmm) (Deviation No. DV-3)	NA	NA
D-2		RHR heat exchanger outlet temperature	2	ITI-310,320	0-400°F	A	NA	A	NA	NA	Control Room Panel RHR	No Further action required See footnote (ii) (Deviation No.s DV-1 & DV-3)	CMPLT	CMPLT
D-3a	SI System	Accumulator tank level	3	ILA-110,111, 120,121,130 131,140,141	4.148 to 120.8 in. (wide range) (52% of total volume) 104.15 to 120.8 in (narrow range) (7.5% of total volume)	NA	NA	NA	NA	NA	Control Room Panel SIS	No further action required Category requirements relaxed to category 3 as stated in SER provided by the NRC dated Nov. 17, 1993	CMPLT	CMPLT
D-3b		Accumulator Tank pressure	3	IPA-110,111, 120,121,130, 131,140,141	0-800 psig	NA	NA	NA	NA	NA	Control Room Panel SIS	No further action required Category requirements relaxed to category 3 as stated in SER provided by the NRC dated Nov. 17, 1993.	CMPLT	CMPLT
D-4		Accumulator Tank Isolation valve position	2	IMO-110,120, 130,140	closed or open	NA	NA	A	NA	NA	Control Room Panel SIS	None required see footnote (r) & (kk) (Deviation No.3)	NA	NA
D-5		Boric acid Charging flow										See item D-24		
D-6		Flow in HPI system										See item A-1		
D-7		Flow in LPI system										See item D-1		
D-8		RWST level										See item A-16		
D-9	Primary coolant system	RCP status	3	Q1,Q2,Q3,Q4	0-1200 A	NA	NA	NA	NA	NA	Control Room Panel RCP	No action required	NA	NA
D-10		Primary system safety relief valve positions or flow thru or pressure in relief lines.	2	QR-107 A,B, C,D	NA	A	NA	A	NA	NA	Control Room Panel RC	No action required see footnote (b) (Deviation No.s DV-1 & DV-3)	NA	NA
D-11		Pressurizer level										See item A-10		
D-12		Pressurizer heater status	2	Group A1,A2, A3,C1,C2,C3	on/off	NA	NA	A	NA	NA	Control Room Panel PRZ	No action required see footnotes (d) & (ll) (Deviation No. DV-3)	NA	NA

For Definition of "A" See Section 3.0

Type D Variables: "those variables that provide information to indicate the operation of individual safety systems and other systems important to safety. These variables are to help the operator make appropriate decisions in using the individual systems important to safety in mitigating the consequences of an accident." Note: The schedule and status for each instrument is for when all of the applicable recommendations of Regulatory Guide 1.97, Rev 3 will be met.

Item No.	Purpose	Variable	Cat.	Tag Nos.	Range	EQ	SQ	QA	SF	PS	Display Location	Remarks/Action Req'd	U-1 Schedule	U-2 Schedule
D-1	RHR System	RHR System Flow	2	IFI-310,311, 320,321	0-1500 GPM 1500-5000 GPM	A	NA	A	NA	NA	Control Room Panel RHR	No Action Required See footnotes (jj) & (mmm) (Deviation No. DV-3)	NA	NA
D-2		RHR Heat Exchange Outlet Temp	2	ITI-310,320	0-400°F	A	NA	A	NA	NA	Control Room Panel RHR	No further action required (See footnote (ii) (Deviation No.s DV-1, & DV-3)	CMPLT	CMPLT
D-3a	SI Systems	Accumulator Tank Level 3/		ILA-110,111 120,121, 130,131, 140,141	4.148 to 120.8 in. (wide range) (52% of Total Volume) 104.15 to 120.8 in. (narrow range) (7.5% of Total Volume)	A	NA	A	NA	NA	Control Room Panel SIS	Replace the wide range transmitter each tank with env. qual. equipment See footnotes (iii) Qualification shall apply to the wide range instruments only. (Deviation No.s DV-1, & (DV-3)	1989 refueling outage	1990 refueling outage
D-3b		Accumulator Tank Pressure 3/		IPA-110,111, 120,121, 130,131, 140,141	0-800 psig	A	NA	A	NA	NA	Control Room Panel SIS	Replace one transmitter/ tank with env. qualified equipment. Qualification shall apply to only one instrument/tank. (Deviation No.s DV-1, & DV-3)	1989 refueling outage	1990 refueling outage
D-4		Accumulator Tank Isolation Valve Position	2	IMO-110,120, 130,140	Closed or Open	NA	NA	A	NA	NA	Control Room Panel SIS	None Required See footnote (r) & (kk) (Deviation No. 3)	NA	NA

For Definition of "A" See Section 3.0