

*Central file*

# INDIANA & MICHIGAN POWER COMPANY

P. O. BOX 18  
BOWLING GREEN STATION  
NEW YORK, N. Y. 10004

September 17, 1979  
AEP:NRC:00256

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74

Mr. J. G. Keppler, Regional Director  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter supplements our letter of August 8, 1979 which responded to action item 1-B of IE Bulletin Nos. 79-05C and 79-06C. The attachment to this letter provides responses to the remaining action items of the bulletin. Your letter of August 16, 1979 to us granted our request of August 8, 1979 for partial relief from the requirements of item 1-B.

We are members of the Westinghouse Owners' Group which is responding to the concerns of the Commission resulting from the TMI-2 accident. The present work scope encompasses previous NRC requests for information, NUREG-0578 and IE Bulletin Nos. 79-05C and 79-06C. Active discussions are now taking place between the Owners' Group, Westinghouse and the NRC, where issues contained in your requests are being evaluated. Our response to the action items of IE Bulletin Nos. 79-05C and 79-06C are in-line with the generic approach taken by the Owners' Group. As such, we find ourselves proposing schedules to answer some of your requests. We believe that this alternative approach will satisfy you and avoid conflicts and duplication of efforts.

Very truly yours,

*John E. Dolan*  
John E. Dolan  
Vice President

JED:em

cc: R. C. Callen  
G. Charnoff  
R. S. Hunter  
R. W. Jurgensen  
D. V. Shaller - Bridgman

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Mid-October: : Guidelines which have been reviewed by the NRC will be provided to each utility. Appropriate utility personnel associated with writing procedures will meet with the Owners' Group Subcommittee on Procedures and Westinghouse to provide the background for revising their emergency procedures.

1 to 2 months )  
from Mid- ) Plant specific procedures will be revised  
October: ) accordingly.

3 to 4 months )  
from Mid- ) Revised procedures will be implemented and  
October: ) operators trained.

Action Item 5:

Analyses related to inadequate core cooling and definition of conditions under which a restart of the RCP's should be attempted will be performed by the Owners' Group. Resolution of the requirements for the analyses and an acceptable schedule for providing the analyses and guidelines and procedures resulting from the analyses will be arrived at between the Westinghouse Owners' Group and the NRC staff.

Long-Term Action:

As discussed in our response to item 2, we do not believe that automatic tripping of the RCP's is a required function based on the analyses that have been performed and submitted, and the guidelines that have been developed for manual RCP tripping. We propose that this item be discussed with the NRC staff following their review of the Owners' Group submittal.

Action Item 1A:

On July 30, 1979 standing orders were issued to all operations personnel (licensed and non-licensed) to immediately trip the RCP's upon a reactor trip and initiation of safety injection caused by low reaction coolant system pressure.

Action Item 2:

A series of Loss of Coolant Accident (LOCA) analyses for a range of break sizes and a range of time lapses between initiation of break and pump trip applicable to the 2, 3 and 4 loop plants has been performed by the Westinghouse Owners' Group. A report (WCAP-9584) summarizing the results of the analysis of delayed Reactor Coolant Pump trip during small loss of coolant accidents for Westinghouse NSSS was submitted to Mr. J. F. Stolz by Mr. Cordell Reed on August 31, 1979. The report provides maximum PCT's and pump shutoff times for each break size considered. The report concludes that if the reactor coolant pumps are tripped prior to the reactor coolant system pressure reaching 1250 psia, the resulting PCT's are less than or equal to those reported in the Plant's FSAR. In addition, it is shown generically that there is a finite range of break sizes and RCP trip times, in all cases 10 minutes or later, which will result in PCT's in excess of 2200°F as calculated with conservative Appendix K models. In any event, the operator would have at least 10 minutes to trip the RCP's following a small break LOCA, especially in light of the conservatism in the calculations. This is appropriate for manual rather than automatic action and agrees with the guidelines for termination of RCP operation presented in WCAP-9600.

Action Item 3:

The Westinghouse Owners' Group has developed guidelines which were submitted to the NRC in Section 6 of Appendix A of WCAP-9600. The analyses provided as the response to item 2 are consistent with the guidelines in WCAP-9600. No changes to these guidelines are needed for both LOCA and non-LOCA transients.

Action Item 4:

The Owners' Group effort to revise emergency procedures covers many issues, including operation of the Reactor Coolant Pumps. The action taken in response to item 1 is sufficient as an interim measure and no immediate need exists for changing our emergency procedures to include the tripping of the Reactor Coolant Pumps. The expected schedule for revising the LOCA, steamline break and steam generator tube rupture emergency procedures by the Owners' Group is the following: