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RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests extension for implementation of NUREG-0737, Items II.B.3.2,II.F.1.1,II.F.1.3,II.F.1.6,& II.F.2.3 due to equipment procurement problems & unexpected equipment malfunctions.

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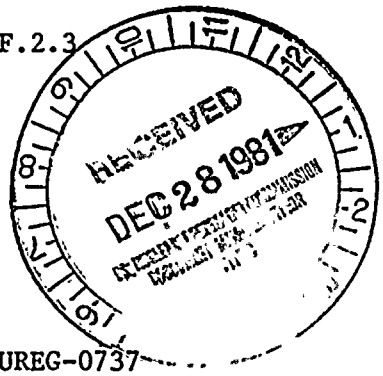
NEW YORK, N. Y. 10004

December 23, 1981
AEP:NRC:0652

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NUREG-0737; ITEMS II.B.3.2, II.F.1.1, II.F.1.3, II.F.1.6, II.F.2.3
REQUEST FOR EXTENSION



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

This letter requests an extension of time from the NUREG-0737 mandated implementation dates for the following items: II.B.3.2 (Post-Accident Sampling-Plant Modifications), II.F.1.1 (Noble Gas Monitor), II.F.1.3 (Containment High Range Monitor), II.F.1.6 (Accident Monitoring-Containment Hydrogen) and II.F.2.3 (Instrumentation for Detection of Inadequate Core Cooling-Installation of Level Instruments). We are requesting an extension to 30 days after the end of the refueling outages in 1982 to complete these items for both Units 1 and 2. By then we will also have available at the site, for your review, the necessary design information. These refueling outages are currently scheduled for May-June, 1982 (Unit 1) and October-November, 1982 (Unit2).

We have expended considerable resources in trying to meet the implementation dates given in NUREG-0737. The physical installations of these systems are either complete or very nearly complete. However, we need to request this extension due to equipment procurement problems and unexpected equipment malfunctions which may lead to design changes or new equipment. The requested extension should permit us to complete the subject items bringing them to a fully operational and qualification stage.

Even though our request extends the dates until the upcoming refueling outages, we are proceeding expeditiously to try to complete some of those items as soon as we can. We fully expect that those items not requiring shutdown of the Units for their completion will be finished well before the requested date, provided no new procurement or equipment problems arise.

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With exception of Item II.F.2.3, the Cook Plant has installed systems which perform functions that, in a limited way, are equivalent to those which the upgraded NUREG-0737 systems would perform. Specifically, we have in place an interim post-accident sampling system, the containment radioactivity levels are monitored in each Unit by three instruments and the hydrogen monitoring system previously existing still remains in place. These systems will remain functional until the corresponding NUREG-0737 items are in place. Furthermore, with respect to Item II.F.2.3, there are saturation meters installed and functional at the Cook Plant which can be used to detect the onset of inadequate core cooling conditions. In addition, inadequate core cooling procedures are in place at Cook Plant.

Very truly yours,

R. S. Hunter
Vice President

RSH/md

cc: John E. Dolan - Columbus
R. W. Jurgensen
D. V. Shaller - Bridgman
R. C. Callen
G. Charnoff
Joe Williams, Jr.
Resident Inspector at Cook Plant - Bridgman