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50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
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HUNTER,R.S. Indiana & Michigan Electric Co.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application to amend Licenses DPR-58 & DPR-74,changing Tech Specs 3/4.6.3,Table 3.6-1,3.6.1.7 & 4.6.1.7.1 to allow containment purging during normal operations,W/Class I amend fee.

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August 30, 1982
AEP:NRC:0370B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
CONTAINMENT PURGING TECHNICAL SPECIFICATION CHANGE REQUEST

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

Dear Mr. Denton:

The attachments to this letter contain a proposed Technical Specification (T/S) change for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2 to allow containment purging during normal plant operations. This request is being submitted to you in response to Mr. S. A. Varga's letter of October 30, 1981, and in accordance with the commitments made in our letter of January 15, 1982 (AEP:NRC:0370A). This request for T/S change supplements our original request of January 13, 1978, G. P. Maloney of Indiana and Michigan Power Co. to E. G. Case of NRC.

We have developed the proposed T/S change to govern the use of the active containment ventilation system while in operational modes 1, 2, 3, and 4. Our proposed T/S changes do not include leak testing of the containment purge valves as suggested in Enclosure 1 to Mr. S. Varga's letter for the reasons indicated in Attachment 1 to this letter.

Attachment 1 provides information in support of the proposed T/S change. Attachment 2 contains the proposed T/S pages with their associated Bases Section. We have used the sample T/S contained in Mr. Varga's letter as guidance in developing these proposed T/S. This T/S change has been reviewed by both the PNSRC and the NSDRC.

As indicated in our letter No. AEP:NRC:0723 dated July 21, 1982, we are replacing the purge and vent isolation valves with valves of superior leak tightness. These valves do not use resilient seat material and hence are not subject to the restrictions of Enclosure 1 to

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Mr. Varga's October 30, 1981 letter. Further, these new isolation valves have met the previous operability requirements of NRC Branch Technical Position CSB 6-4, Rev. 1, as imposed on the old valves. The valve manufacturer's final test report will be available at the Cook Plant site for your review.

I&MECo considers this T/S change request to constitute a Class III amendment with an additional Class I "duplicate unit" fee. Therefore, pursuant to paragraph 170.22 of 10 CFR 170, a check in the amount of $4,400.00 is also attached.

This document has been prepared following Corporate Procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

R. S. Hunter
Vice President

RSH/os

cc: John E. Dolan - Columbus
M. P. Alexich
R. W. Jurgensen
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
Joe Williams, Jr.
NRC Resident Inspector at Cook Plant - Bridgman

ATTACHMENT 1 TO AEP:NRC:0370B

Presently Cook Unit 2 is barred from purging in Modes 1, 2, 3, and 4, and Cook Unit 1 is allowed to purge in accordance with NRC Interim Position 1 (as described in Mr. A. Schwencer's letter of February 11, 1980) while in Modes 1, 2, 3, and 4.

Two sets of changes are requested. We describe them below.

A) First, the proposed Limiting Condition of Operation (LCO) No. 3.6.1.7 is consistent with the requirements of NRC Branch Technical Position CSB 6-4, Rev. 1 (as applied to our Containment Ventilation System in the Cook Plant FSAR) and Enclosure 2 to Mr. S. Varga's letter of October 30, 1981. Specifically the LCO requires:

a) Applicability only in Modes 1, 2, 3, and 4,

b) That the purge valves be closed as much of the time as possible, and

c) The use of a maximum of one purge supply path (two valves in series) and one purge exhaust path (two valves in series) at a time.

We believe that this LCO is conservative in that it would require a Unit shutdown when remedial actions cannot be completed in the allowed time. It is also reasonable in that it allows purging when required by Plant operating conditions within the intent of Enclosure 2 to Mr. S. Varga's letter of October 30, 1981. No surveillance is required other than that previously required by Specification 3/4.6.3.1 (Containment Isolation Valves). The installation of the superior leak tightness quality purge isolation valves is comensurate with the requirements of Specification 3/4.6.3.1.

Mr. S. A. Varga's letter of October 30, 1981, noted that the NRC was concerned over the possibility of excessive degradation of purge valve resilient seats due to severe environmental conditions and/or wear due to frequent cycling. It was thus suggested in Mr. Varga's letter that the purge isolation valves be leak tested at least once every six months, and that a schedule be proposed for the replacement of valve seals/seats. During the 1982 refueling outages Clow Air Operated High Performance Butterfly Valves are being installed in the D. C. Cook Plant Containment Ventilation Isolation Systems. These valves use laminated stainless steel seals and stainless steel seat rings, rather than resilient seats. Therefore, the concerns noted in Mr. Varga's letter are no longer applicable to the D. C. Cook Nuclear Plant purge isolation system, and no leak testing beyond the current 10 CFR 50 Appendix J

requirements is needed. The Clow valves have also met a set of operability requirements similar to those imposed on the original purge isolation valves. These requirements are consistent with the requirements of Branch Technical Position CSB 6-4, Rev. 1.

B) The second set of changes pertain to T/S 3/4.6.3.1 and to Table 3.6-1. The LCO No. 3.6.3.1 has been modified to exclude the containment purge supply and exhaust isolation valves from the requirements of T/S 3/4.6.3.1 since a new 3.6.1.7 (described in A) above) is being proposed which covers them. Table 3.6-1 is being changed to add a footnote (**) to indicate that the containment purge and exhaust isolation valves can be opened as per T/S 3/4.6.1.7. Please note that the pages being submitted for the revisions to Table 3.6-1 reflect the changes we requested in our letter No. AEP:NRC:0699, dated July 13, 1982.

ATTACHMENT 2
TO AEP:NRC:0370B