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 AUTH. NAME: AUTHOR AFFILIATION
 HERING, R.F. Indiana & Michigan Electric Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests extension to 830615 to provide addl info requested
 in Generic Ltr 82-28 re inadequate core cooling
 instrumentation sys. Summary of previously submitted info re
 Westinghouse differential pressure monitoring sys encl.

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INDIANA & MICHIGAN ELECTRIC COMPANY

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

March 11, 1983
AEP:NRC:0761

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
INADEQUATE CORE COOLING INSTRUMENTATION SYSTEM
(GENERIC LETTER NO. 82-28) 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:

Upon receipt of Generic Letter No. 82-28, an internal review was established in order to provide the requested additional information concerning our Inadequate Core Cooling (ICC) Instrumentation System's conformance with NUREG-0737, Item II.F.2. We are, however, presently unable to respond to this request in the format of the Generic Letter's attached checklist. The inability to comply with the 90-day response time arises from a lack of available information concerning the finalization of the replacement in-core thermocouple system's design. AEPSC is currently negotiating with three vendors for the contract to replace existing in-core thermocouple system. Additionally, ongoing discussions are being conducted with Westinghouse regarding the Reactor Vessel Level Instrumentation System's (RVLIS) calibration difficulties and equipment location. Accordingly, we hereby request an extension to June 15, 1983, so that we may appropriately address the concerns of Generic Letter No. 82-28.

We wish to state for the record, however, that the Westinghouse differential pressure monitoring system (RVLIS) is installed in the Donald C. Cook Nuclear Plant to serve as the required reactor coolant inventory tracking system. As stated in Generic Letter No. 82-28, the NRC has completed its generic review of the RVLIS and deemed it acceptable for tracking reactor coolant system inventory. The subcooling margin monitors are installed and operational. Information regarding the RVLIS and the subcooling margin monitors has

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been previously submitted to the NRC via various letters as summarized in Attachments 1 and 2, of this letter.

We are in the process of conducting engineering studies concerning the in-core thermocouple system for Unit 1. It is currently anticipated that the installation of this new thermocouple system should commence during the 1985 refueling outage. This schedule is based on an anticipated one year lead time for the equipment. Following Unit 1's installation a plan will be developed to install a new thermocouple system in Unit 2.

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. F. Hering
Vice President

/os

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

Attachment 1 to AEP:NRC:0761

The following submittals have been transmitted by AEP or by Westinghouse Electric Company (W) to the NRC in support of the RVLIS design:

(a) Letter No. AEP:NRC:0398D, dated March 31, 1981

This letter served to transmit a version of the "Summary Report, Westinghouse Reactor Vessel Level Instrumentation System for Monitoring Inadequate Core Cooling (7300 System), December, 1980", which is applicable to the Donald C. Cook Nuclear Plant.

(b) Letter Nos. AEP:NRC:0398F and AEP:NRC:0398G, dated September 17, 1981 and November 20, 1981, respectively

These letters responded to Mr. S. A. Varga's letter of August 8, 1981 which requested additional information on the Westinghouse Summary Report on the RVLIS.

(c) Supplementary Information

Submittal letter from Mr. E. P. Rahe (W) to Mr. L. E. Phillips (NRC) NS-EPR-2579 of March 19, 1982.

(d) Westinghouse Evaluation of Tests

Mr. E. P. Rahe's (W) letter to Mr. L. E. Phillips (NRC) NS-EPR-2526 of December 9, 1981 provided the results of tests S-UT-3, S-UT-6, S-UT-7, S-NC-2, S-NC-3, and S-NC-8, which support the evaluation of the RVLIS design.

(e) Westinghouse Evaluation of Tests S-UT-8

Letter from Mr. E. P. Rahe (W) to Mr. L. E. Phillips (NRC), NS-EPR-2542 of January 13, 1982.

(f) Westinghouse Evaluation of Test S-1B-1 and Functional Test

Letter from Mr. E. P. Rahe (W) to Mr. L. E. Phillips (NRC), SED-SA-0081 of June 28, 1982.

(g) Response to Request to WOG for Additional Information

Letter from Mr. E. P. Rahe (W) to Mr. Dennis M. Crutchfield (NRC), NS-EPR-2597 of May 14, 1982.

(h) RCS Wide Range Pressure Instrumentation

Letter from Mr. E. P. Rahe (W) to Mr. R. C. Young (NRC),
NS-EPR-2586 of April 21, 1982.

Attachment 2 to AEP:NRC:0761

The following submittals have been transmitted to the NRC in support of the subcooling margin monitor design.

- (a) Letter No. AEP:NRC:0253, dated October 24, 1979

This letter served to notify the NRC of our intention to install subcooling margin monitors and of our interim method of determining subcooling margin.

- (b) Letter No. AEP:NRC:0253A, dated November 26, 1979

This letter responded to an NRC request for additional information on the subcooling margin monitor contained in Mr. Harold R. Denton's letter of October 30, 1979.

- (c) Letter No. AEP:NRC:0253B, dated December 19, 1979

This letter provides a description of the plant parameters employed to calculate subcooling margin with the Prodac plant computer, and display options available.

- (d) Letter No. AEP:NRC:0334, dated January 18, 1980

This letter details our compliance with NUREG-0578 Section 2.1.3.b, "Instrumentation for Inadequate Core Cooling".

- (e) Letter No. AEP:NRC:0334B, dated March 10, 1980

This letter provides a description of the subcooling margin monitor input processing employed to calculate the subcooling margin. The qualification of the subcooling margin monitor components is also addressed.

- (f) Letter No. AEP:NRC:0346, dated January 30, 1980

This letter provides the subcooling margin criteria for the termination of safety injection.

The NRC review determined that the saturation margin monitors meet the short term lessons learned requirements for Section 2.1.3.b of NUREG-0578. The summary of this review is included in a letter from Mr. A. Schwencer to Mr. J. Dolan (AEP) dated March 20, 1980.

