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

SUBJECT: Requests NRC judgement re compliance of listed plant procedures w/requirements of Tech Spec 4.7.1.2.a.2.b for turbine driven auxiliary feedwater pump.Tech Specs in Rev 4 to NUREG-0452 (STS) do not address assumed water temp.

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November 28, 1984
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Donald C. Cook Nuclear Plant
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
INTERPRETATION OF THE TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENTS FOR THE TURBINE DRIVEN AUXILIARY FEEDWATER PUMP (TDAFP)

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

Dear Mr. Denton:

Pursuant to our conversations with members of your staff and the NRC Region III staff, this letter is a request for you to provide an interpretation as to whether or not the D. C. Cook Plant procedures, as described below, properly implement the requirements of Technical Specification (T/S) 4.7.1.2.a.2.b.

It is our current understanding that the basis of the Technical Specification requirement for the TDAFP (T.S. 4.7.1.2.a.2.b; "The steam turbine driven pump develops a discharge pressure of 1285 psig at a flow of 700 gpm when the secondary steam pressure is greater than 310 psig.") was developed by degrading the manufacturer's pump performance curve (flow vs. differential head) by 5 percent. This degraded differential head in feet was utilized in calculating the discharge pressure in psig, based on the specific gravity of water at 60°F. The current plant procedure adjusts the Technical Specification required discharge pressure by establishing a minimum discharge pressure associated with the actual condensate temperature. This correction allows a true comparison of pump performance to that required in the Technical Specification. A review of past 2 years performance data was made and the maximum correction was found to be 6 psi.

The results of our examination show that the T/S, T/S Bases, and the Standard Technical Specifications for Westinghouse Pressurized Water Reactors (NUREG-0452, Revision 4) do not address an assumed water temperature for the specified surveillance pressure of the TDAFP. Further, it is our belief that the methodology described above provides an engineering rationale that prudently addresses the safety basis of the plant.

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Very truly yours,

M. P. Alexich
Vice President

RJBK
11/28/84

MPA/cm

cc: John E. Dolan
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NRC Resident Inspector - Bridgman