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 AUTH. NAME AUTHOR AFFILIATION
 ALEXICH, M.P. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Discusses status of K(Z) factor used in Exxon LOCA/ECCS evaluation model. Measured peak LHGR of Exxon Nuclear Co fuel approx 76% of Tech Spec limits.

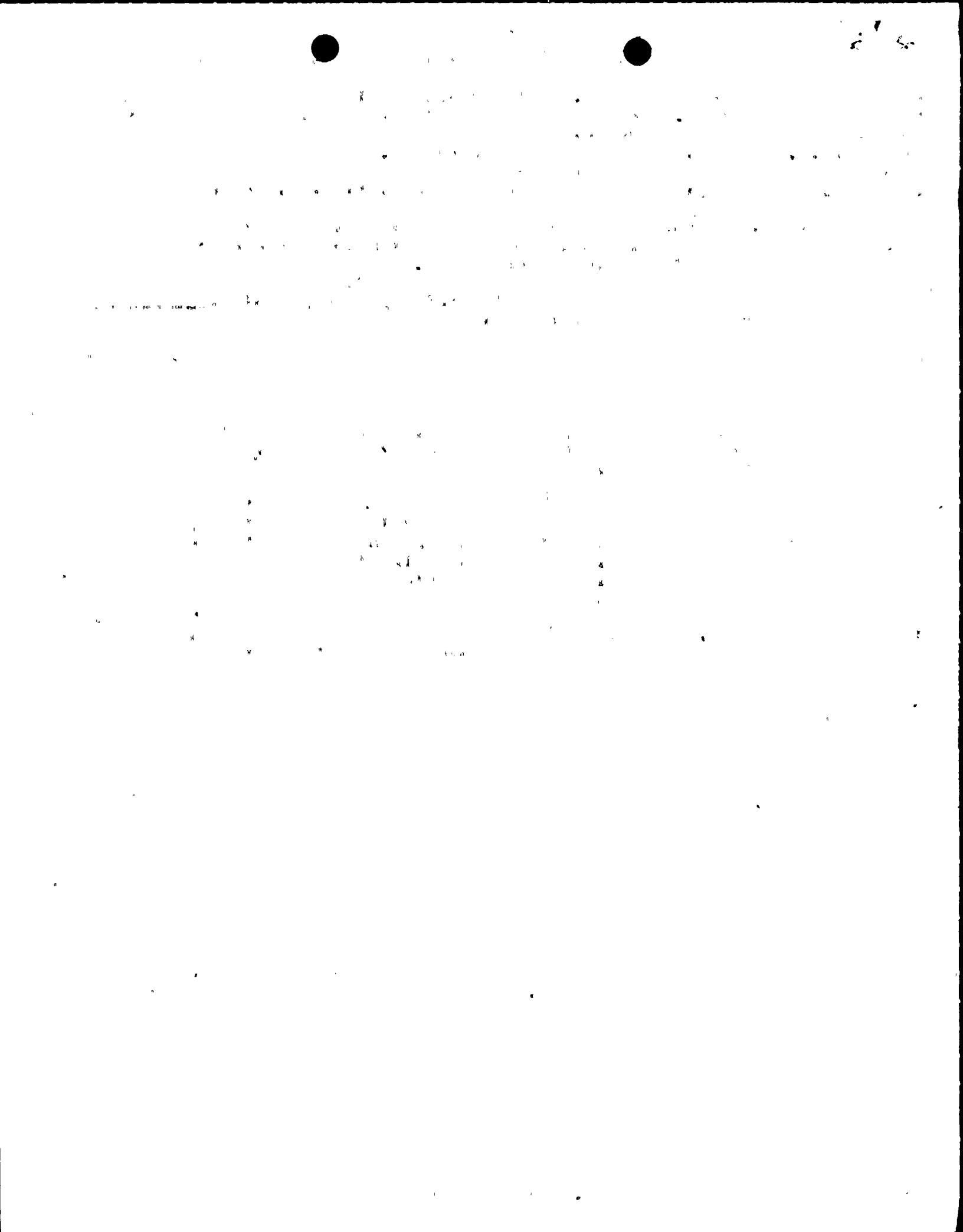
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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

AEP:NRC:0745U
March 29, 1985

Donald C. Cook Nuclear Plant Unit No. 1
Docket No. 50-315
License No. DPR-58
STATUS OF K(Z) FACTOR USED IN EXXON LOCA/ECCS EVALUATION MODEL

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

Dear Mr. Denton:

This letter is submitted pursuant to discussions with your staff concerning the Exxon LOCA/ECCS Evaluation Model which supports the operation of Exxon Nuclear Company (ENC) fuel in the Donald C. Cook Nuclear Plant, Unit 1. ENC has been evaluating the impact of various axial power shapes on the LOCA/ECCS analysis results for the D. C. Cook Unit 2 plant using their current Evaluation Model for 17x17 fuel. Our initial review of the applicability of this issue to the current Cycle 8 operation of Unit 1 resulted in the conclusion that it should not be a concern because the Exxon fuel currently in the Donald C. Cook Nuclear Plant has high burnup and operates at low power. At the present time, the measured peak Linear Heat Generation Rate (LHGR) of ENC fuel is about 76% (with penalties) of the current limit defined by the Technical Specifications.

We understand that this issue is currently under detailed review by your staff and by ENC. As an additional precaution, we have applied the current Unit 2 K(Z) curve to Unit 1. This has been applied by administrative limit, which is similar to, but not the same as, that used for Unit 2. Exxon has advised us of the methodology to be used for this application.

It is to be noted that Unit 1 of the Donald C. Cook Nuclear Plant, now completing Cycle 8, is scheduled for a refueling shutdown beginning approximately on April 5, 1985. Based on our previous evaluation and recent communication with ENC, we believe that the Donald C. Cook Nuclear Plant is being operated in a safe and conservative manner.


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You should also note that we recognize that appropriate regulatory approval for the remaining 33 Exxon assemblies that will remain in Cycle 9 following the refueling will be required before we can justify the balance of the reload under the provisions of 10CFR50.59 as we originally intended. We will be in contact with your staff to determine the most expeditious manner by which this can be done.

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,


M. P. Alexich
Vice President
RBK
3/29/85

MPA:wj

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
George Bruchmann
R. C. Callen
R. Charnoff
NRC Resident Inspector - Bridgman
G. F. Owsley, ENC - Richland, WA