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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME: ALEXICH, M. P. AUTHOR AFFILIATION: Indiana & Michigan Electric Co.
 RECIP. NAME: DENTON, H. R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Responds to request for addl info per 850115 ltr advising of potential for removing spray additive sys Tech Spec requirement, Westinghouse will perform analysis of removing spray additive. Continued plant operation justified.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

May 31, 1985
AEP:NRC:0914B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
SPRAY ADDITIVE SYSTEM TECHNICAL SPECIFICATION
RESPONSE TO REQUEST FOR FURTHER INFORMATION

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

Dear Mr. Denton:

In our letter of January 15, 1985 (AEP:NRC:0914) we advised you that we were considering the potential for removing the requirement for the sodium hydroxide (NaOH) spray additive in lieu of supplying the additional information requested in your November 26, 1984 letter. As discussed recently with your staff, we believe that sufficient technical basis may exist to remove the requirement for the NaOH spray additive. This belief is based in part on preliminary evaluations indicating that (1) sufficient sodium tetraborate exists in the ice condenser to assure that, following ice melt, a caustic solution is available when the spray system is in the recirculation mode, and (2) changes in analytical methodology since the plant was licensed should demonstrate that removal of the NaOH spray additive will not result in the dose limits specified in 10 CFR Part 100 being exceeded.

Westinghouse Electric Corporation, the organization that will be performing the analysis has advised us that a complete report in this matter should be available toward the end of 1985. Assuming the results indicate that the NaOH spray additive may be removed, we anticipate submitting the report for your review and approval along with the appropriate technical specification change request by December, 1985.

Pending completion of such analysis, we believe that continued plant operation is justified based on the current surveillance tests. This conclusion is based in part on (1) the availability of sodium tetraborate in the ice condenser, (2) the initial preoperational testing demonstrated that the system would deliver NaOH as designed during the injection phase, (3) in the recirculation mode, the sump effluent will contain NaOH from the first pass in addition to the sodium tetraborate from the ice, (4) periodic surveillance testing does demonstrate the operability of the system components, and (5) a preliminary evaluation by Westinghouse Electric Company that, even with the removal of the NaOH spray additive, they expect the doses to be within the 10 CFR 100 guidelines. You should


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be advised that on the above basis it is our intent to continue operation based on the current surveillance techniques until such time as we can justify to your staff that the requirements for NaOH spray additive can be deleted from the Technical Specifications for Units 1 and 2 of the Donald C. Cook Nuclear Plant.

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
5/28/85

cm

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman

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Very truly yours,

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