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 DENTON, H. R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Responds to 851019 request for addl info re amends to
 Licenses DPR-58 & DPR-74, revising Tech Specs re containment
 isolation valves. Footnote added to Page 3/4 6-1 requesting
 exemption from valve insp.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

October 18, 1985

AEP:NRC:0433H

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
ADDITIONAL INFORMATION FOR TECHNICAL
SPECIFICATION CHANGE REQUESTS IN LETTER AEP:NRC:0433D
ON CONTAINMENT ISOLATION VALVES

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 in response to a request by your staff for additional information concerning Attachment 1 to our letter AEP:NRC:0433D dated October 19, 1984, which requested license amendments to the Technical Specifications (T/S) for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2. The additional information is as follows:

Change No. 1: Unit No. 1, Page 3/4 6-1

As it is currently written, T/S 4.6.1.1 states that all containment penetrations (except those listed in Table 3.6-1) that do not have automatic isolation valves which are operable and are required to be closed under accident conditions shall be verified closed, by inspection, once in 31 days. However, there are some valves inside containment that are locked, sealed, or otherwise secured. Access to these valves inside containment is either impossible or undesirable on a monthly basis when the unit is operating due to ALARA considerations. The footnote we are adding to page 3/4 6-1 requests an exemption from inspecting these valves and notes that the valves will be inspected during cold shutdowns. This footnote was not included in early drafts of the Standard Technical Specifications (STS) on which the Unit 1 T/Ss were based, but has been incorporated in more recent revisions of the STS. This change will make the Unit 1 T/S consistent with the Unit 2 T/S and the STS (NUREG-0452, Revision 4).

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Change No. 2: Unit No. 1, Pages 3/4 6-14 and 6-15

The purpose of change No. 2 is to make the Unit 1 Surveillance Requirements for containment isolation valves consistent with those in Unit 2 and the STS. The Unit 2 T/Ss and the STS have requirements similar to the current Unit 1 T/Ss however, there are several differences as follows:

- a) The requirement in Unit 1 T/S 4.6.3.1.1.a for cycling each power-operated or automatic valve every 92 days is replaced by T/S 4.6.3.1.3, which requires testing in accordance with the ASME Code Section XI. Testing in accordance with the ASME Code will result in some valves (Valves that are normally closed and cannot be operated during normal plant operations and Fail-Safe Valves as described in ASME Code Section XI IWV-3410(e)) being tested during every cold shutdown instead of every 92 days. We believe the relaxation of this surveillance interval for these few valves will not significantly impact safety. We believe the new surveillances are adequate to demonstrate and maintain operability of these valves based on successful operation of Unit 2 under these T/Ss and the requirement of these T/S by the STS.
- b) The requirement in T/S 4.6.3.1.2.e, which requires that each manual valve not locked, sealed, or otherwise secured in the closed position, be cycled at least once every 18 months is deleted. We believe deletion of this surveillance has no impact on safety because there are no manual containment isolation valves that are not locked, sealed or otherwise secured in the closed position.

Change No. 3: Unit No. 1, Pages 3/4 6-16 through 6-22, Table 3.6-1

The column that is being deleted from Table 3.6-1 was originally provided in order to distinguish between those valves which could be tested during operation and those which could not be. Now, however, this information is given in the IST program, which is written in conformance with Section XI of the ASME Code. This program has been submitted to the NRC for approval. Therefore the, "testable during plant operation" column is extraneous information and is being deleted from the Table. This change also puts the Unit 1 Table 3.6-1 into the same format as the Table in the Unit 2 T/Ss and the STS.

Change No. 4: Unit No. 2, Page 3/4 6-30, Table 3.6-1

In our application for amendment, we requested permission to apply administrative controls to allow opening valves SM-8 and SM-10 in order to obtain upper containment grab samples. As T/S 3.6.3.1 is currently written, the opening of valves SM-8 and SM-10 requires entry into an Action Statement and the associated administrative tasks. Consequently, we have been sending personnel into the upper containment when it is necessary to obtain upper containment grab samples, even if the unit is at power. Allowing these valves to be opened under administrative controls will permit us to take grab samples without unnecessarily exposing personnel. This change will also make the Unit 2 T/Ss for these valves identical to the respective T/Ss for Unit 1.

THE UNITED STATES OF AMERICA

OFFICE OF THE ATTORNEY GENERAL
WASHINGTON, D. C.
DEPARTMENT OF JUSTICE

IN REPLY TO YOUR LETTER OF THE 10TH INSTANT, THE FOLLOWING INFORMATION IS FURNISHED:
The Department of Justice has received information from the Federal Bureau of Investigation that the following persons have been identified as being connected with the activities of the Communist Party, U. S. A.:
[List of names and addresses follows]

It is requested that you advise the Department of Justice of any further information you may have regarding the activities of the Communist Party, U. S. A., or any of the persons named above.

THE UNITED STATES OF AMERICA

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The Department of Justice has received information from the Federal Bureau of Investigation that the following persons have been identified as being connected with the activities of the Communist Party, U. S. A.:
[List of names and addresses follows]

THE UNITED STATES OF AMERICA

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The Department of Justice has received information from the Federal Bureau of Investigation that the following persons have been identified as being connected with the activities of the Communist Party, U. S. A.:
[List of names and addresses follows]

Change No. 5: Unit No. 2 Pages 3/4 6-28 and 6-13; Table 3.6-1

The amendment number given for the valve replacement was inaccurately referenced in our previous submittal. The correct reference is Amendment 42 to License No. DRR-74. In the Safety Evaluation attached to Amendment 42, this valve replacement was described as follows:

- "2. Fourteen check valves in the non-essential service water system have been replaced with valves of superior closing characteristics."

At the time Amendment 42 was issued the new valves (WCR) were added to the list of containment isolation valves but the valves that were removed (NSW) were inadvertently left on this table. The purpose of this change is to correct this oversight.

Change No. 6

This change removes a footnote that reflected our plans to install replacement valves during the 1982 Unit 1 and 2 refueling outages. The valve replacement was completed at that time leaving this footnote meaningless. Thus we request its deletion.

The changes made in this letter are primarily administrative changes. The purpose of these changes is to enhance operation through consistency between Unit 1 and 2 T/Ss, allowance of operational flexibility in the T/Ss, enhancement of the ALARA program, and deletion of information no longer relevant to plant operation. In addition we have reviewed the sections in our FSAR and Safety Evaluation Reports relevant to these changes and have found no reasons, licensing or technical, why these changes should not be implemented.

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

yes
10-18-85

cm

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

THE UNIVERSITY OF CHICAGO
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CHICAGO, ILLINOIS

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DR. J. H. DUNN

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