REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8603040282 DOC. DATE: 86/02/25 NOTARIZED: NO DOCKET #
FACIL: 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
AUTH. NAME AUTHOR AFFILIATION
ALEXICH, M. P. Indiana & Michigan Electric Co.
RECIP. NAME RECIPIENT AFFILIATION
DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125

SUBJECT: Requests verification of Tech Spec interpretation to operate in Mode 3 for up to 30 days beyond 860228, in order to perform auxiliary feedwater sys testing. Confirmation requested by 860226. Fee paid.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 3
TITLE: OR Submittal: General Distribution

NOTES:

| | RECIPIENT ID CODE/NAME | | COPIES LTTR | COPIES ENCL | RECIPIENT ID CODE/NAME | | COPIES LTTR | COPIES ENCL |
|---|---|---|---|---|---|---|---|---|
| | PWR-A ADTS | | 1 | 0 | PWR-A PD4 PD 01 | | 5 | 5 |
| | PWR-A EB | | 1 | 1 | PWR-A EICSB | | 1 | 1 |
| | PWR-A FOB | | 1 | 1 | WIGGINGTON, D | | 1 | 1 |
| | PWR-A PSB | | 1 | 1 | PWR-A RSB | | 1 | 1 |
| INTERNAL: | ADM/LFMB | | 1 | 0 | ELD/HDS3 | | 1 | 0 |
| | NRR/DHFT/TSCB | | 1 | 1 | NRR/ORAS | | 1 | 0 |
| | REG FILE | 04 | 1 | 1 | RGN3 | | 1 | 1 |
| EXTERNAL: | 24X | | 1 | 1 | EG&G BRUSKE, S | | 1 | 1 |
| | LPDR | 03 | 1 | 1 | NRC PDR | 02 | 1 | 1 |
| | NSIC | 05 | 1 | 1 | | | | |

Rec'd w/check #15000

TOTAL NUMBER OF COPIES REQUIRED: LTTR 23 ENCL ~~17~~ 9

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

February 25, 1986
AEP:NRC:0775AC

Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316
License No. DPR-74
TECHNICAL SPECIFICATION INTERPRETATION
REQUEST FOR VERIFICATION

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

Dear Mr. Denton:

Pursuant to conversations with your staff, this letter is to request verification of our Technical Specification Interpretation which would allow operation of the Donald C. Cook Nuclear Plant in Mode 3 for up to 30 days beyond February 28, 1986. Discussion with Messrs. Ed Greenman, Jim Heller and John Suerman of NRC-Region III has indicated that such operation would be acceptable provided that we (1) comply with the Technical Specifications, or (2) request emergency relief from the Technical Specifications. The need for operation in Mode 3 beyond February 28, 1986 is to perform auxiliary feedwater system testing prior to cooling down the plant for refueling. The current situation arose (i.e., we are required to shutdown after February 28, 1986) as a result of our extension from the requirements of 10 CFR 50.49. That extension was granted through February 28, 1986. At the time we requested the extension, certain events, such as a recent shutdown due to a transformer fire and a continual power restriction at 80%, were not anticipated. As a result, we would like the additional time in hot standby, Mode 3, to perform the aforementioned tests. This interpretation will allow us to operate Unit 2 in Mode 3 through March 5, 1986. At that time, we will have to bring the Unit to Mode 4 because of other surveillances which expire at that time.

We previously requested an extension until February 28, 1986 on three items: (1) cables for reactor coolant system hot and cold leg resistance temperature detectors (wide-range), (2) cables for ITT Barton narrow-range steam generator level transmitters, and (3) Triax instrument cables for post-accident

A001
1/0



Rec'd w/check $150.00

high-range area radiation monitors. We believe that operating in Mode 3 beyond February 28 will not raise a safety issue nor cause us to be in non-compliance with our Technical Specifications for the following reasons:

- Review of our T/Ss has indicated that item (1) above is permitted to be inoperable for up to 30 days, and item (3) is not yet a T/S item, although if it were, it would be under our current post-accident monitoring T/S which would permit it to be out of service for up to 30 days.

- Item 2 serves two functions--a short term trip/ESF actuation function and a long term monitoring function. We believe the long term monitoring function is governed by Technical Specification 3.3.3.6, which permits the channels to be out of service for 30 days. The short term function is governed by Specification 3.3.2.1 which requires the system to be operable for the purpose of initiation of automatic ESF actuation of the turbine and motor driven auxiliary feedwater pumps while in Mode 3. In our letter AEP:NRC:0775W we stated in part,

  "The narrow-range steam generator level transmitters perform two functions for the D. C. Cook Nuclear Plant, a short-term trip function and a long-term post-accident monitoring function. With regard to the short-term trip function when the steam generator has a low level, these transmitters must respond within 22.1 seconds following a main steam line break. During this period the containment flood level will not rise high enough to threaten the cables, whose submergence qualification has not been proven through sequential testing (separate effects testing has, however, been performed successfully)."

We believe the above argument is also applicable to the Loss of Coolant Accident and fully demonstrates the OPERABILITY requirements of the T/Ss while the plant is in Mode 3, since the systems can meet their intended safety function.

On the basis of the above, we believe that we are in compliance with our T/Ss and with our current EQ extension as granted by Mr. Chink's letter of November 14, 1985 provided we shutdown the unit on February 28, 1986 and that we remain in Mode 3 for a period of not longer than 30 days beyond that time. As discussed with your staff, we also agree to remain below 540°F while in Mode 3 beyond February 28, 1986. This is to provide additional assurance that all accident analyses requirements are met.

Your written confirmation of this interpretation is requested by February 26, 1986 in order to avoid the premature shutdown of the plant.

Pursuant to 10 CFR 170.12(b), we have enclosed a check for $150.00.

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 2/25/86

Attachments

cm

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