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 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Describes util interpretation of Tech Specs 3.1.1.3, 3.4.1.2,  
 3.4.1.3 & 3.9.8.1 re borated water addition to RCS from  
 refueling water storage tank. Requests notification by 860331  
 if NRC has concerns re interpretation.

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February '28, 1986

AEP:NRC:0975A

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
BORON DILUTION FROM THE REFUELING WATER STORAGE TANKS

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

Dear Mr. Denton:

Pursuant to discussions with your staff, the purpose of this letter is to advise you of our interpretation of Technical Specifications (T/Ss) 3.1.1.3, 3.4.1.2, 3.4.1.3, and 3.9.8.1, specifically as they apply to borated water addition to the Reactor Coolant System (RCS) from the Refueling Water Storage Tank (RWST).

T/S 3.1.1.3 requires reactor coolant flow of at least 3,000 gpm during dilution of the RCS boron concentration in any mode. T/Ss 3.4.1.2 and 3.4.1.3 require at least one coolant loop to be in operation during boron dilution in Modes 3, 4, and 5. T/S 3.9.8.1 requires 3,000 gpm of coolant flow via the Residual Heat Removal System during boron dilution in Mode 6. Because of concerns with literal T/S compliance, questions have arisen as to the applicability of these specifications during the times when we add water to the RCS from an operable RWST, specifically when the boron concentration of the RWST is lower than the RCS.

The RWST minimum boron concentrations stated in the T/Ss were established to ensure that adequate shutdown margin is maintained. Because of this, it is our belief that the boron dilution limitations of T/Ss 3.1.1.3, 3.4.1.2, and 3.4.1.3 are not applicable during water addition from the RWST, provided the boron concentration in the RWST exceeds the minimum requirements stated in the T/Ss.

This issue poses operational difficulties, which will be particularly troublesome during the shutdown modes we will be entering in association with the upcoming Unit 2 refueling outage. We would therefore appreciate notification by March 31, 1986 if your staff has questions or concerns regarding our interpretation. Until that date, we will refrain from adding water from the RWST to the RCS when the RWST water is at a lower boron concentration than the RCS without the required coolant flow. After that date, unless we receive instructions from you to the contrary, we will follow our interpretation as described in this letter.

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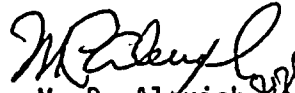
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This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

  
M. P. Alexich  
Vice President 2/26/26

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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