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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315  
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 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Notifies of change in proposals in 830622 & 840820 ltrs re  
 plans to relocate two in-core thermocouples in upper reactor  
 head region of plant. Thermocouples will be left in present  
 position at top of fuel.

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# INDIANA & MICHIGAN ELECTRIC COMPANY

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September 23, 1986  
AEP:NRC:0761E

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
RELOCATION OF TWO INCORE THERMOCOUPLES

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

Dear Mr. Denton:

The purpose of this letter is to notify you of a change in our plans to relocate two incore thermocouples in the upper reactor head region of the Donald C. Cook Nuclear Plant. In previous letters to the NRC (AEP:NRC:0761A, dated June 22, 1983, and AEP:NRC:0761C, dated August 20, 1984) we proposed to relocate two thermocouples, one from each channel, to monitor temperatures in the upper head region to assist in monitoring local vessel temperature conditions during natural circulation modes of operation.

We are now proposing to leave the thermocouples in their present position at the top of the fuel. Since the above letters were written, this change has been determined to be costly and technically difficult to implement, and would not provide significantly enhanced information beyond the currently installed equipment. Many hardware and procedural changes have been made to improve the operators' ability to detect inadequate core cooling (ICC) since the incore thermocouple relocation was first proposed. We have newly upgraded incore thermocouples in Unit 1 and are scheduled to upgrade the Unit 2 thermocouples during the Unit 2, outage scheduled for 1987. In addition, we have a subcooling margin monitor (SMM), Reactor Vessel Level Instrumentation System (RVLIS), reactor head vent valves, and new Emergency Operating Procedures (EOPs). We therefore believe that sufficient instrumentation, used in conjunction with procedures, now exists to adequately assist the operators in detecting an ICC event during natural circulation. The addition of fluid temperature monitoring instrumentation in the upper reactor head region will not significantly improve the operators' ability to detect an ICC event during natural circulation. Furthermore, we believe the relocation of these two thermocouples is beyond the scope of the requirements of NUREG-0737 (Sections II.F.2; II.F.2, Attachment 1; and Appendix B) and Regulatory Guide 1.97, Revision 3.

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Very truly yours,



H. P. Alexich  
Vice President

PPK  
9/22/86

cm

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

