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ACCESSION NBR: 8003180473 DOC. DATE: 80/03/10 NOTARIZED: NO DOCKET #
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~~50-316~~ Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME AUTHOR AFFILIATION
 DOLAN, J.E. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation

SUBJECT: Responds to NRC 800211 ltr re NRC interim position concerning containment purging & venting during normal operation. Tech Specs being developed to permit purging in Modes 1, 2, 3 & 4 & submitted next month.

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P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

March 10, 1980
AEP:NRC:00370

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

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

Dear Mr. Denton:

This letter responds to Mr. Schwencer's letter of February 11, 1980 regarding the Commission's interim position concerning containment purging and venting during normal plant operation. We are disappointed that after more than two and a half years of work to resolve this issue, we are still prohibited from purging in D. C. Cook Unit No. 2 when operating in Modes 1, 2, 3, and 4.

In most cases, we believe that we have complied with the intent of Interim Position 1 as contained in the enclosure to Mr. Schwencer's letter. Your letter requested us to commit to your Interim Position 1 on Unit 1 until you have completed your review. Therefore, for the record, we hereby state that Unit 1 operation will comply with Interim Position 1 until your review is completed. Interim Position 2 of Mr. Schwencer's letter is fully met for both Units 1 and 2 of the Cook Plant.

At the May 31, 1979 meeting with members of your staff and in our letter of June 29, 1979 (AEP:NRC:00114B), we discussed the need for purging at length and provided a description of the way we conduct containment purging operations. We consider purging in Modes 3 and 4 to perform required maintenance to be in compliance with the intent of Interim Position 1. This is more beneficial than a cooldown to Mode 5 from the standpoint of (a) imposing unnecessary thermal stress cycles on the reactor coolant system and its components and, (b) reducing the potential for causing unnecessary challenges to the reactor trip and the safeguards systems. Purging reduces operational hardships on the personnel performing required activities in the containment. Please realize that even if purging operations are carried out in a way that fully complies with Interim Position 1 of Mr. Schwencer's letter, we may need to purge the containment for more than the earlier discussed limit of 90 hours per

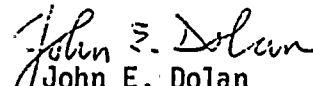
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year (AEP:NRC:00114A). We interpret your interim position to allow us to exceed the 90 hours per year, as long as we operate in a manner consistent with the requirements of Position 1.

As the request of your staff, we are developing a Technical Specification to allow purging in Modes 1, 2, 3, and 4. We anticipate submitting such a Technical Specification within the next month. It is our earnest hope that such submittal will finally allow the issue to be closed.

Very truly yours,


John E. Dolan
Vice President

JED:dr

cc: R. C. Callen
G. Charnoff
R. S. Hunter
R. W. Jurgensen
D. V. Shaller - Bridgman