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50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
AUTH.NAME AUTHOR AFFILIATION
HUNTER,R.S. Indiana & Michigan Electric Co.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Submits estimate of required annual purge sys operation time during Operational Modes 1-4,in response to request. Estimated annual purge operation time 200-h for each unit, based on plant capacity factor of 77%.

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November 19, 1982
AEP:NRC:0370C

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

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

Dear Mr. Denton:

This letter supplements our previous submittal AEP:NRC:0370B, dated August 30, 1982, and provides, at the request of your staff, an estimate of the required annual purge system operation time for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2 during operational modes 1, 2, 3, and 4.

We estimate that the required annual purge operation time in modes 1 through 4 will be two hundred (200) hours for each unit. This purge estimate is based on a plant capacity factor of 77%, and accounts for two purge operations per week. Each purge operation is assumed to be approximately 2 ½ hours in duration. The annual 200-hour purge operation time limit amounts to less than 3% of the estimated plant operation time in Modes 1 through 4.

In accordance with our Technical Specification change request (AEP:NRC:0370B) referenced above, we will operate the containment purge system only for safety related reasons. The ability to purge when needed will improve work conditions for plant maintenance and inspection personnel by reducing airborne radioactivity, reducing the need for respiratory equipment, and increasing worker safety on the job. We believe this to be consistent with our ALARA objectives.

Furthermore, we note that Mr. S. A. Varga's letter of October 30, 1981, states that units not meeting 10 CFR 100 radiation dose limits for a postulated LOCA coincident with purge system operation would be limited to 90 hours per year of purging. As explained in our letter of

A034

October 31, 1977, John Tillinghast (Indiana & Michigan Power Co.) to Edson G. Case (NRC), such a postulated accident scenario at D. C. Cook will not lead to doses exceeding 10 CFR 100 limits. The analysis performed at that time in support of our position was consistent with NRC Branch Technical Position CSB 6-4. As noted in our AEP:NRC:0370B submittal referenced above, we are replacing all containment purge isolation valves during the 1982 refueling outages. These new valves have the same isolation time as the old valves, but are of superior leak tightness. Thus, we believe the requested 200-hour annual purge limit is a "reasonable goal" as stated in Mr. Varga's letter referenced above.

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,

R. S. Hunter
Vice President

RSH/sag

cc: John E. Dolan - Columbus
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