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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
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 ALEXICH, M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION
 MURLEY, T.E. Document Control Branch (Document Control Desk)

SUBJECT: Responds to 901214 ltr re emergency response capability &
 conformance to Reg Guide 1.97. Summary of upgrade to
 presently installed wide-range steam generator level
 indication encl.

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Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
UPGRADE OF WIDE-RANGE STEAM GENERATOR WATER
LEVEL INSTRUMENTATION PER SUPPLEMENTAL SAFETY
EVALUATION REPORT DATED DECEMBER 14, 1990

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

ATTN: T. E. Murley

January 30, 1991

Dear Dr. Murley:

This letter responds to your December 14, 1990 letter concerning our emergency response capability and conformance to Regulatory Guide 1.97.

Your letter states that we should install wide-range steam generator level instrumentation that complies with the Category 1 criteria of Regulatory Guide 1.97, 10 CFR 50.49, and Regulatory Guide 1.100. We are proposing to upgrade our presently installed wide-range steam generator level indication consistent with the previously upgraded Category 1, Regulatory Guide 1.97 instrumentation. The Safety Evaluation Report attached to your December 14, 1990 letter concurs that this design and its deviations and justifications are acceptable under the guidance provided in Regulatory Guide 1.97. A summary of this upgrade, provided in the same format as our previous Regulatory Guide 1.97 submittals, is shown in the attachment.

Details of the above proposal were presented to your staff on January 24, 1991. We also presented our schedule for the upgrade. Although we are anxious to complete this upgrade, an actual walkdown of the in-containment areas will have to be performed before the necessary detailed installation drawings can be generated. The detailed installation drawings are necessary for the various crafts to fabricate and assemble as many of the components as possible prior to entry into containment and, of course, for actual installation. We have estimated that an outage.

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of four to six weeks for each unit will be needed to perform the walkdowns and associated preliminary in-containment design activities. We are presently scheduling these walkdowns for the next refueling outages (1992) for both units. The actual upgrade installation would then be performed during the following refueling outages, currently anticipated to start in late 1993.

We concur with the staff's recommendation that we be prepared to start the containment walkdowns earlier if an unscheduled outage occurs. Our ability to complete such a walkdown, however, would be a function of the length of the unscheduled outage and whether or not the necessary areas are accessible.

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

Sincerely,


M. R. Alexich
Vice President

MPA/eh

Attachment

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
NFEM Section Chief
A. B. Davis - Region III
NRG Resident Inspector - Bridgman

Item No.	Purpose	Variable	Cat.	Tag Nos.	Range	E Q	S Q	Q A	S F	P S	Display Location	Remarks/Action Required	Schedule U1	U2
D-15	Secondary System (Steam Generator)	S/G Level	1	BLI-110, -120, -130 -140	From 12" above tube sheet to separators	A	A	A	A	A	Control Room Panel SG	None required, see footnotes (i) & (oo) (Deviation No. DV-11)	N/A	N/A
Re-vised D-15	Secondary System (Steam Generator)	S/G Level	1	BLI-110, -120, -130 -140	From 12" above tube sheet to separators	A	A	A	A	A	Control Room Panel SG	Install seismically qualified control room indicators and recorders. Re-route cable outside of control room area to provide separation. Relocate, re-tube, and revise cable routing for level transmitters inside containment to provide seismic and environmental qualification.. (Deviation Nos. DV-1, DV-2, DV-3, and DV-4*).	1993RF	1993RF

*Deviations DV-1, DV-2, DV-3, and DV-4 are explained in our submittal AEP:NRC:0073AB dated October 5, 1988.