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ACCESSION NBR:7902270231 DOC DATE: 79/02/16 NOTARIZED: YES DOCKET #  
 FACIL:50-316 DONALD C. COOK NUCLEAR POWER PLANT, UNIT 2, INDIANA & 05000316  
 AUTH.NAME AUTHOR AFFILIATION  
 DISBROW,R.E. INDIANA & MICHIGAN POWER CO.  
 RECIP.NAME RECIPIENT AFFILIATION  
 DENTON,H.R. OFFICE OF NUCLEAR REACTOR REGULATION

SUBJECT: REQUESTS RELIEF FROM PERFORMANCE OF LOAD REJECTION TEST OF  
 FSAR AMEND 82. TEST DEEMED UNNECESSARY BECAUSE STRINGENT  
 SURVEILLANCE TESTING HAS ASSURED THAT OVERSPEED PROTECTION  
 EQUIPMENT WILL PERFORM WHEN REQUIRED. RISKS NOT JUSTIFIED.

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THE  
OFFICE OF THE  
ATTORNEY GENERAL  
STATE OF NEW YORK  
ALBANY  
JANUARY 10, 1900  
TO THE  
COMMISSIONER OF THE  
LAND OFFICE  
ALBANY  
SIR:  
I have the honor to acknowledge the receipt of your letter of the 7th inst. in relation to the application of the State of New York for a writ of habeas corpus in the case of the State of New York vs. the State of New York, and in reply to inform you that the same has been forwarded to the proper authorities for their consideration.

# INDIANA & MICHIGAN POWER COMPANY

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

February 16, 1979  
AEP:NRC:00130

Donald C. Cook Nuclear Plant Unit No. 2  
Docket No. 50-316  
License No. DPR-74

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

Dear Mr. Denton:

On November 27, 1978 (AEP:NRC:00086) we requested from the Commission permission from having to perform, as part of the startup testing of Unit 2 of the Donald C. Cook Nuclear Plant, an independent turbine trip test. More specifically, our request, transmitted to you as part of an FSAR amendment (No. 82), would allow us to perform only the load rejection test.

We have further evaluated the usefulness in performing a load rejection test. Based on today's turbo-generator technology and the AEP experience in operating both the Cook Units and our coal-fired units, we have concluded that this load rejection test is unnecessary. We therefore request relief from having to perform the load rejection test. Let me now expand on the reasons on which we base our request.

The Unit 2 turbine control system, since commercial operation on July 1, 1978, has responded successfully, automatically or manually, from power levels above 75% on the following occasions:

<u>DATE</u>	<u>POWER</u>	<u>TRIP</u>	<u>REASON FOR TRIP</u>
7/6/78	97%	Generator	Loss of stator water cooling
7/14/78	98%	Turb-Reactor	Loss of feed pump

7902270231

Approved  
3/10  
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CONTINUED

<u>DATE</u>	<u>POWER</u>	<u>TRIP</u>	<u>REASON FOR TRIP</u>
8/21/78	99%	Turb-Reactor	Low Vacuum
8/27/78	85%	Turb-Reactor	Low Vacuum
11/26/78	75%	Turb-Reactor	Loss of Feed Pump
1/13/79	100%	Generator	Electrical Fault-ice on 765 kV Insulator

The overspeed protection system is functionally checked on an annual basis. The steam valves, main stop, control and reheat stops and interceptor valves are tested weekly. The emergency governor device simulating an overspeed trip is actuated weekly. The oil trip system which actuates the controls for complete valve closure is tested during each start-up.

Please note that the unit trip from 98% power level on 7/14/78 shown above, opened the generator breakers and simultaneously tripped the turbine valves hydraulically. This is the same trip sequence performed during the Load Rejection Test, except that the unit would be at a slightly higher power/load. The 100% power condition was present in the January 13, 1979 trip also shown above, which is for all practical purposes identical to the load rejection test trip.

We have in the American Electric Power System, in addition to our two nuclear units, 39 single reheat units with over 650 operating years (177 unit years) of experience, and 11 double reheat units operating with over 90 operating years of experience. Extensive and frequent checking of all equipment relevant to the turbine-generator's overspeed protection is carried out on these units.

Through proper surveillance testing, we are assured that the overspeed protection equipment will perform when required. The load rejection test only proves that the equipment functions properly at that particular instance. It is our opinion that the data to be gained from the performance of this test simply does not justify the risks involved

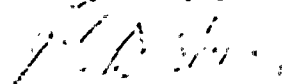
Mr. Harold R. Denton, Director

-3-

AEP:NRC:00130

when you unnecessarily expose this urgently needed production equipment to such violent transients.


Véry truly yours,



R. E. Disbrow  
Vice President

RED:em

Sworn and subscribed to before me  
this 16<sup>TH</sup> day of February, 1979  
in New York County, New York

  
Notary Public

GREGORY M. GURICAN  
Notary Public, State of New York  
No. 31-4513431  
Qualified in New York County  
Commission Expires March 30, 1979

cc: R. C. Callen  
G. Charnoff  
P. W. Steketee  
R. J. Vollen  
R. Walsh  
D. V. Shaller-Bridgman  
R. W. Jurgensen

FACILITY AMENDMENT CLASSIFICATION - DOCKET NO(S) 50-315/1316

Licensee: Inders & Mushjian Power Company

Plant Name and Unit(s): Coke Units 1 & 2

License No(s): OPR Nos 58 & 74 \* Mail Control No: 7902270231

Request Dated: Nov 27, 1978 & Feb 16, 1979 Fee Remitted: Yes ✓ No \_\_\_\_\_

Assigned TAC No: 11506

Licensee's Fee Classification: Class I \_\_\_\_\_, II X, III \_\_\_\_\_, IV \_\_\_\_\_, V \_\_\_\_\_, VI \_\_\_\_\_,  
None \_\_\_\_\_.

Amendment No. \_\_\_\_\_ Date of Issuance \_\_\_\_\_

☐ 1. This request has been reviewed by DOR/DPM in accordance with Section 170.22 of Part 170 and is properly categorized.

☒ 2. This request is incorrectly classified and should be properly categorized as Class III. Justification for classification or reclassification:  
Single safety issue clearly identified by an NRC position and not deemed to involve significant hazards consistent

☐ 3. Additional information is required to properly categorize the request:

☐ 4. This request is a Class \_\_\_\_\_ type of action and is exempt from fees because it:

(a) \_\_\_\_\_ was filed by a nonprofit educational institution,

(b) \_\_\_\_\_ was filed by a Government agency and is not for a power reactor,

(c) \_\_\_\_\_ is for a Class \_\_\_\_\_ (can only be a I, II, or III) amendment which results from a written Commission request dated \_\_\_\_\_ for the application and the amendment is to simplify or clarify license or technical specifications, has only minor safety significance, and is being issued for the convenience of the Commission, or

(d) \_\_\_\_\_ other (state reason therefor): \_\_\_\_\_

\* Note: no action required on Unit 1, ~~but~~ License # 58. This is a one unit action but both letters apply.

Dev  
3/6/79

John H. [Signature] 3/7/79  
Division of Operating Reactors/Project Management

☐ The above request has been reviewed and is exempt from fees Item 4

William O. Miller, Chief  
License Fee Management Branch

\_\_\_\_\_  
Date

William O. Miller, Chief  
License Fee Management Branch, ADM

*Docket File*  
Date: 2/1/79

Amended Form Date: \_\_\_\_\_

FACILITY AMENDMENT CLASSIFICATION - DOCKET NO(S). 50-315

Licensee: Indiana & Michigan Electric Company

Plant Name and Unit(s): Donald C Cook Unit No. 1

License No(s): DPR-58

Mail Control No: 78/2290/P2

Request Dated: 12/22/78

Fee Remitted: Yes \_\_\_\_\_ No \_\_\_\_\_

Assigned TAC No: 11421

Licensee's Fee Classification: Class I \_\_\_\_\_, II ✓, III \_\_\_\_\_, IV \_\_\_\_\_, V \_\_\_\_\_, VI \_\_\_\_\_,  
None \_\_\_\_\_.

Amendment No. \_\_\_\_\_ Date of Issuance \_\_\_\_\_

- ☐ 1. This request has been reviewed by DOR/DPM in accordance with Section 170.22 of Part 170 and is properly categorized.
- ☒ 2. This request is incorrectly classified and should be properly categorized as Class III. Justification for classification or reclassification:  
More than administrative or editorial changes involved.
- ☐ 3. Additional information is required to properly categorize the request:  
\_\_\_\_\_  
\_\_\_\_\_
- ☐ 4. This request is a Class \_\_\_\_\_ type of action and is exempt from fees because it:
- (a) \_\_\_\_\_ was filed by a nonprofit educational institution,
- (b) \_\_\_\_\_ was filed by a Government agency and is not for a power reactor,
- (c) \_\_\_\_\_ is for a Class \_\_\_\_\_ (can only be a I, II, or III) amendment which results from a written Commission request dated \_\_\_\_\_ for the application and the amendment is to simplify or clarify license or technical specifications, has only minor safety significance, and is being issued for the convenience of the Commission, or
- (d) \_\_\_\_\_ other (state reason therefor): \_\_\_\_\_

*[Signature]* 2/1/79 *[Signature]* 2/1/79  
Division of Operating Reactors/Project Management

☐ The above request has been reviewed and is exempt from fees.

FACILITY AMENDMENT CLASSIFICATION - DOCKET NO(S). 50-315/1376

Licensee: Indiana & Michigan Power Company

Plant Name and Unit(s): Coale Units 1 & 2

License No(s): OPR Nos 58 & 74 \* Mail Control No: 7902270231

Request Dated: Nov 27, 1978 & Feb 16, 1979 Fee Remitted: Yes ✓ No    

Assigned TAC No: 11506

Licensee's Fee Classification: Class I    , II X, III    , IV    , V    , VI    ,  
None    .

Amendment No.     Date of Issuance    

☐ 1. This request has been reviewed by DOR/DPM in accordance with Section 170.22 of Part 170 and is properly categorized.

☒ 2. This request is incorrectly classified and should be properly categorized as Class III. Justification for classification or reclassification:  
Single safety issue clearly identified by an NRC position and not deemed to involve significant hazards consideration

☐ 3. Additional information is required to properly categorize the request:

☐ 4. This request is a Class     type of action and is exempt from fees because it:

(a)     was filed by a nonprofit educational institution,

(b)     was filed by a Government agency and is not for a power reactor,

(c)     is for a Class     (can only be a I, II, or III) amendment which results from a written Commission request dated     for the application and the amendment is to simplify or clarify license or technical specifications, has only minor safety significance, and is being issued for the convenience of the Commission, or

(d)     other (state reason therefor):    

\* Note: no action required on Unit 1, but License # 58. This is a one unit action but both letters apply.

DeW  
3/6/79

John A. Lawrence 3/7/79  
Division of Operating Reactors/Project Management

☐ The above request has been reviewed and is exempt from fees. Item 4



