REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8006240482 DOC.DATE: 80/06/20 NOTARIZED: NO DOCKET #
FACIL:50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
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

SUBJECT: Forwards responses to NRC 800507 ltr re addl TMI-2 related requirements.Procedures for feedback of operating experience to plant staff will be reviewed.Licensee will provide info to Westinghouse for generic rept.

DISTRIBUTION CODE: A001S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 6
TITLE: General Distribution for after Issuance of Operating Lic

NOTES: I&E: 3 cys all matl.

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
ACTION:	BC VARGA,S. 05	7	7			
INTERNAL:	A/D CORE & CS21	1	0	A/D REACT SYS18	1	0
	CHEM ENG BR 17	1	0	EMERG PREP 16	1	0
	HANAUER,S. 20	1	1	I&E 12	2	2
	MOORE,V. 22	1	1	NRC PDR 02	1	1
	OELD 14	1	0	OR ASSESS BR 19	1	0
	QA BR 15	1	0	REG FILE 01	1	1
EXTERNAL:	ACRS 20	16	16	LPDR 03	1	1
	NSIC 04	1	1			

JUN 25 1980

TOTAL NUMBER OF COPIES REQUIRED: LTTR ~~38~~ 41 ENCL ~~31~~ 34

MA
4

6D

INDIANA & MICHIGAN ELECTRIC COMPANY

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

June 20, 1980
AEP:NRC:00419

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
Additional TMI-2 Related Requirements

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

Dear Mr. Denton:

The attachment to this letter provides our response to Mr. D. Eisenhut's letter of May 7, 1980, which we received on May 12, 1980, concerning additional TMI-2 related requirements.

Very truly yours,

R. S. Hunter
Vice President

RSH:dfs

cc: R. C. Callen
G. Charnoff
J. E. Dolan
R. W. Jurgensen
D. V. Shaller - Bridgman

A001
S
1/1

8006240 482

ATTACHMENT

TO

AEP:NRC:00419

Only those items applicable to the Westinghouse PWR designs are addressed below:

Item I.A.1.3: Shift Manning

AEP will respond to this item after the NRR criteria which were scheduled to be issued by May 15, 1980 have been received.

Item I.A.3.1: Revised Scope and Criteria for Licensing Examinations

AEP has initiated the implementation of the requirements contained in Mr. H. R. Denton's letter of March 28, 1980 on this subject. Where required, these programs will be submitted to the NRC's Operating License Branch for review by August 1, 1980.

Item I.C.5: Procedures for Feedback of Operating Experience to Plant Staff

Procedures for the feedback of operating experience to the plant staff will be reviewed. These procedures will be revised as necessary to assure that important operating information pertinent to plant safety originating both within and outside the utility organization is supplied to operators and other personnel and is incorporated into the training programs. The review will be completed by January 1, 1981.

Item II.K.3.1: Installation and Testing of Automatic Isolation System

AEP does not believe that an automatic PORV isolation system should be installed. Recent plant modifications, procedure changes and operator training (e.g., NUREG-0578 requirements) provide assurance that when required, the function of the isolation system is provided by operator action. In addition, failure to isolate a stuck open PORV (leading to a small break LOCA) has been analyzed and results in no core uncovery for Westinghouse PWR's. Further, failure of the proposed isolation system could impair the function of the PORVs which are instrumental in decreasing the intensity of many transients.

Item II.K.3.2: PWR Vendor Report on PORV Failure Reduction

AEP, as a member of the Westinghouse Owners' Group, will provide information to Westinghouse as it is needed for the preparation of the subject generic report. It is our understanding that the report will be submitted by January 1, 1981.

Item II.K.3.3: Reporting Safety and Relief Valve Failures and Challenges

All pressurizer safety and relief valve failures to close which occur at the Donald C. Cook Nuclear Plant after April 1, 1980 will be promptly (within 30 days) reported to the NRC and all safety and relief valve challenges which occur after April 1, 1980 will be reported in the Cook Plant Annual Operating Report.

Item II.K.3.5: Automatic Trip of Reactor Coolant Pumps During LOCA

In our response to IE Bulletin 79-06C dated September 17, 1979 (AEP:NRC:00256), we referenced the Westinghouse Owners' Group analysis of delayed RCP trip during a small break LOCA documented in WCAP-9584. The report is the basis for the Westinghouse and Owners' Group position that an automatic RCP trip is not necessary for Westinghouse PWR's since sufficient time is available for manually tripping the pumps. This approach has been incorporated into the Westinghouse emergency operating instructions which were reviewed and approved by the NRC's Bulletins and Orders Task Force and subsequently incorporated into the Cook Plant Emergency Operating Procedures. In addition, the RCP trip criteria incorporated into the emergency procedures provide for continued RCP operation and therefore forced RCS flow and decreased reliance on operator action during non-LOCA events.

As requested by the NRC in a letter dated April 15, 1980 and as discussed with the NRC during the May 22, 1980 meeting on this subject, we anticipate that the Westinghouse Owners' Group will provide predictions of the LOFT L3-6 Test. The NRC staff has indicated that small break tests at the Semiscale and LOFT facilities as well as Owners' Group test predictions will aid the NRC in resolving this issue. Therefore, we believe that it is not appropriate to take any additional actions on this issue until the results of the NRC-sponsored testing (in particular L3-5 and L3-6) and Owners' Group predictions are completed and the results evaluated.

Item II.K.3.9: Proportional Integral Derivative (PID) Controller Modification

The recommended modifications to the PID controller as discussed in Appendix VIII to NUREG-0611 and Section 3.2.4.a of NUREG-0611 have already been implemented at the Cook Plant. The PID controller was modified in October 1974 for Unit 1 and August 1977 for Unit 2 to disable that portion of the controller which permitted the PORVs to operate automatically below either their nominal setpoint or normal RCS operating pressure. Also, as described in our letter No. AEP:NRC:00185A dated June 6, 1979, the modification addressed by Section 3.2.4.a of NUREG-0611 to raise the setpoint for all pressure bistables for the PORV interlock pressure to 2350 psia was performed during May 1979 on both Units 1 and 2.

Item II.K.3.10: Proposed Anticipatory Trip Modifications

There are no plans to make, at the Cook Plant, the anticipatory trip modification to confine the range of use to high power levels. Should, after detailed analysis, implementation of this trip modification be proposed in the future, we will submit appropriate documentation of the modification for staff approval prior to its implementation in accordance with the requirements of this item.

Item II.K.3.12: Confirm Existence of Anticipatory Trip Upon Turbine Trip

The reactor is tripped by a trip of the turbine above the P-7 (10% power level) interlock. The trip is implemented by closure of the 4 main stop valves (4/4 logic taken twice) or loss of turbine control fluid trip system pressure (2/3 logic). No change is planned or required in this system.

Item II.K.3.17: Report On Outage of ECC Systems - Licensee Report and Proposed Technical Specifications

A review of the available plant records in this area will be performed and a separate report addressing this item will be submitted by January 1, 1981.

Item II.K.3.30: Revised Small Break LOCA Methods To Show Compliance With 10 CFR 50, Appendix K

The present small break evaluation models (Westinghouse and Exxon) used in the licensing basis of the Donald C. Cook Nuclear Plant are in conformance with 10 CFR 50, Appendix K. Nevertheless Westinghouse has indicated that they will address the specific NRC items contained in NUREG-0611 in a model change scheduled for completion by January 1, 1982. It is also our understanding that Exxon Nuclear Company will also address the NRC concerns in this area.

Item II.K.3.31: Plant Specific Calculations To Show Compliance With 10 CFR 50.46

The present small break LOCA analyses which are part of the licensing basis of the Donald C. Cook Nuclear Plant are in conformance with 10 CFR 50.46. If, after potential modifications to our NSSS vendor's or fuel supplier's small break evaluation models are submitted and approved by the NRC, it is agreed that analysis in addition to our current licensing basis calculations is required, we will submit the results of such a reanalysis in agreement with your proposed schedule.

Item III.D.3.4: Control Room Habitability

The Donald C. Cook Nuclear Plant Control Rooms have deen designed to protect the operator against the hazards of accidental toxic releases, and radioactive dose release under design basis accident conditions, in accordance with Criterion 19, "Control Room", of Appendix A, to 10 CFR Part 50.

However, in accordance with the Staff request AEP shall review the current design aspects of the protection equipment and systems which safeguard control room habitability against the criteria of the Standard

Review Plan referenced in the attachment to Mr. Eisenhut's letter under this item, and we shall present our analyses to the NRC in January 1981 including, if appropriate, modifications. Should modifications of systems or equipment be required, an implementation schedule will be provided, but it cannot be determined at this date if the January, 1981 implementation of modification deadline is practicable or even feasible.