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 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
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 DQLAN, J.E. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation

SUBJECT: Withdraws 790319 & 800522 Tech Spec change requests re rod position indication sys & steam generator water level low low reactor trip/engineered safety features actuation setpoints. Rod position indication sys change unnecessary.

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INDIANA & MICHIGAN ELECTRIC COMPANY

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June 17, 1980
AEP:NRC:00271C

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, submitted at the request of your staff, serves to withdraw previously submitted Technical Specification change requests concerning the Rod Position Indication System and the "Steam Generator Water Level Low Low" Reactor Trip/engineered safety features actuation setpoints.

Rod Position Indication (RPI) System

By letter dated March 19, 1979, AEP:NRC:00145, IMECO. requested that Technical Specification No. 3/4 1.3.1 (Movable Control Assemblies) and 3/4 1.3.2 (position indicator channels) be revised to effectively remove what IMECO. believed to be the requirement that a Licensee Event Report (LER) be submitted when the RPI System indicated rod misalignment greater than 12 steps. The proposed Technical Specifications contained in our AEP:NRC:00145 submittal would very explicitly allow for the measurement of L.V.D.T coil stack voltages to verify rod position and eliminate the need for LER submittal due to faulty RPI readings. Our proposed specifications did not contain the phrase "indicated position."

As stated in Mr. A. Schwencer's letter of October 29, 1979, the NRC has determined that the "indicated (ROD) position" requirement of the current Technical Specifications can be fulfilled by L.V.D.T voltage

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Rod Position Indication (RPI) System (Cont'd)

measurements provided that a sufficient data base has been established to ensure a correlation between L.V.D.T voltage and rod position. The required measurements have been taken on both Units of the Cook Plant to obtain the necessary correlation between L.V.D.T coil voltage and rod position.

In our response to Mr. Schwencer's letter, dated January 16, 1980 (AEP:NRC:00311) we stated that although we agreed with the NRC's determination, we believe that the proposed Technical Specifications contained in our AEP:NRC:00145 submittal more clearly defined the required operator actions to be taken in the event that RPI system should indicate rod misalignment greater than ± 12 steps. Through discussions with members of your staff we were informed that the proposed technical specifications contained in our AEP:NRC:00145 submittal were considered to be unnecessary by the NRC. Therefore, in the interest of closing the matter we hereby withdraw the said Technical Specification change request.

Please note, however, that payment in the amount of \$1,600.00 accompanied our AEP:NRC:00145 submittal and that an additional payment in the amount of \$2,800.00 was forwarded to the Commission via our AEP:NRC:00145A submittal of August 30, 1979; the latter in response to Mr. W. O. Miller's letter of July 16, 1979. As the determination set forth in Mr. Schwencer's letter of October 29, 1979 applies to all plants with Westinghouse supplied RPI systems and was not the result of a Cook Plant specific review by your staff, it is respectfully requested that our payment of \$4,400.00 be refunded. We were informed by members of your staff that no review had started on our request.

Steam Generator Water Level Setpoints

Our response to IE Bulletin No. 79-21, AEP:NRC:00271 dated November 5, 1979, detailed the corrective actions taken to address the effects of a feedwater line rupture inside containment on safety-related water level monitoring systems. One of the corrective actions taken was the increase of the "Steam Generator Water Level Low Low" setpoint by 4% of span for each Unit. Subsequent to telephone discussions with members of your staff and their consultants in mid-April 1980, IMECo. re-evaluated the effects of a hypothetical feedline rupture on the steam generator level monitoring system. As a result of these discussions it was agreed that IMECo. should submit an evaluation (not an analysis) detailing the conservatisms inherent in the Westinghouse analysis and the Cook Plant Design. This evaluation was forwarded to the Commission via our AEP:NRC:00271B letter dated May 22, 1980.

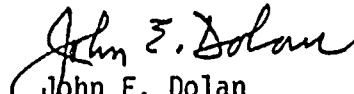
Mr. Harold R. Denton

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AEP:NRC:00271C

Subsequent to submittal of our AEP:NRC:00271B letter we were informed by members of your staff that our evaluation was insufficient to justify our returning the "Steam Generator Water Level Low-Low" setpoints to the pre-IE Bulletin No. 79-21 values. For this reason the Technical Specification change request contained in our AEP:NRC:00271B letter is being withdrawn.

Very truly yours,


John E. Dolan
Vice President

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