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MURLEY,T.E. Document Control Branch (Document Control Desk)

SUBJECT: Suppls 920515 ltr re status of mod of commitment re control room habitability,per GDC 19.Damper need no longer be maintained closed.TS changes & supporting analyses associated w/control room habitability will be submitted.

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AMERICAN ELECTRIC POWER

AEP:NRC:0398Y

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
MODIFICATION OF COMMITMENT REGARDING
CONTROL ROOM HABITABILITY

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

Attn: T. E. Murley

April 26, 1993

Dear Dr. Murley:

In our letter AEP:NRC:0398W, dated May 15, 1992, we provided the NRC with information on measures we have implemented at the Donald C. Cook Nuclear Plant in order to bring the control room ventilation systems more in compliance with the NRC's interpretation of the dose limits of 10 CFR 50 Appendix A General Design Criteria (GDC) 19. This letter provides an updated status regarding those measures.

In AEP:NRC:0398W, we committed to maintaining the (non-redundant) normal intake isolation damper in a closed position, and to limit allowable air intake rates such that the whole body and thyroid doses would be within the Standard Review Plan criteria of 5 and 30 rem, respectively. (These measures would result in a corresponding skin dose of approximately 32 rem, which was within 7% of the 30 rem Standard Review Plan limit.) Maintaining the normal intake isolation damper closed eliminated the need to account for the possible failure of this damper, and thus reduced the calculated dose.

Although the control room remained habitable from an environmental perspective with the normal intake isolation damper closed, this was not a desirable long term solution since it does limit the amount of fresh air that enters the control room during normal operations. In order to reduce the calculated doses and therefore demonstrate compliance with the Standard Review Plan dose criteria without relying on maintaining the normal intake isolation damper closed, we obtained the services of a meteorological consulting firm to provide a plant specific determination of the atmospheric dispersion term (Chi/Q) that is used in the analytical model. The plant specific evaluation resulted in a ninety fifth percentile Chi/Q of

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7.85E-4 sec/m3, versus the previous value of 2.41E-3 sec/m3 which had been derived using the generic methodology referenced in the Standard Review Plan. Since calculated doses are directly proportional to Chi/Q, the newly calculated doses are only one third of the previous. The consultant's report is available for audit at the AEPSC offices in Columbus, OH and at the Cook Nuclear Plant.

The reduction in dose enables us to accommodate a failure of the non-redundant normal intake isolation damper to close while still demonstrating compliance with the Standard Review Plan dose limits dose, provided appropriate limits on air intake are applied. (In accordance with the guidance of Section 6.4 of the Standard Review Plan, the damper is assumed to be closed manually two hours after the accident.) Therefore, this damper need no longer be maintained closed. Limits will be applied to air intake rates such that the Standard Review Plan dose limits for whole body, thyroid, and skin doses are met.

It is our intent to submit proposed technical specification changes (and the supporting analyses) associated with control room habitability. This will be the subject of separate correspondence.

Sincerely,

E. E. Fitzpatrick
Vice President

dr

cc: A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
A. B. Davis - Region III
NRC Resident Inspector - Bridgman
NFEM Section Chief