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 AUTH. NAME AUTHOR AFFILIATION
 HUNTER, R.S. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Discusses depth of water coverage over irradiated fuel during Mode 6 operation. Based on wording of 800815 ltr, util does not meet condition of at least 23 ft of water. Revisions to Tech Spec 3.4.9.10 will be formally submitted.

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September 26, 1980

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
Depth of Water Coverage Over Irradiated Fuel During Mode 6 Operations

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

Dear Mr. Denton:

By letter dated August 15, 1980, all Westinghouse Pressurized Water Reactor Licensees were notified by your office that Westinghouse Standard Technical Specifications and Bases had been modified to require at least 23 feet of water over the top of the reactor pressure vessel flange during movement of fuel assemblies or control rods. Licensees were requested to advise what measures, if any, were required to meet this modified requirement and to provide assurance that exposure of fuel assemblies and control rods cannot occur during transfer while the plant is in Mode 6.

Please be advised that Units No. 1 and 2 of the Donald C. Cook Nuclear Plant are in compliance with the above requirements during the performance of actual refueling operations; however, based on the precise wording of your letter, we do not meet the condition of "at least 23 feet of water" while performing the initial unlatching of control rods, nor when performing the final latching, which is followed by a drag test on reassembled control rods. For reasons of operating efficiency and enhanced personnel safety, the unlatching and latching steps are carried out from a platform whose elevation only allows approximately 16 feet of water cover over the reactor pressure vessel flange; the initial filling and the final draining of the refueling pit are interrupted for these operations. The control rod drag test involves some movement (up to about 36 inches) of the control rods; a smaller movement occurs in connection with latching and unlatching. During unlatching, latching and drag testing, which amount to a total time of approximately 10 hours, there is still a minimum of 23 feet of water over the fuel.

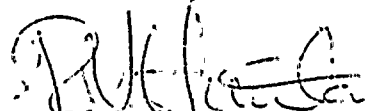
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It should be noted that during these operations, the upper internals are in place and that "transfer" of fuel assemblies or control rods does not occur. Therefore we meet the intent of your letter "to prevent inadvertent exposure of a fuel assembly during transfer."

For completeness we will formally submit Technical Specification revisions to 3.4.9.10 commensurate with our operating practice in the near future.

Very truly yours,


R. S. Hunter
Vice President

cc: attached

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cc: G. Charnoff
R. C. Callen
D. V. Shaller - Bridgman
John E. Dolan
R. W. Jurgensen
NRC Region III Resident Inspector at Cook Plant - Bridgman

