

# PRIORITY 2

(UDOC'S OFFSITE FACILITY)

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9512140224      DOC. DATE: 95/12/11      NOTARIZED: NO      DOCKET #  
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315  
       50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316  
 AUTH. NAME      AUTHOR AFFILIATION  
 FITZPATRICK, E.      Indiana Michigan Power Co. (formerly Indiana & Michigan Ele  
 RECIP. NAME      RECIPIENT AFFILIATION  
                          Division of Freedom of Information & Publications Services

SUBJECT: Comment supporting draft GL 83-11, Suppl 1 providing  
 guidelines to licensees who wish to perform their own safety  
 & reactor core design analyses. Eliminates need to submit  
 detailed topical reports & will save limited NRC resources.

DISTRIBUTION CODE: DS09D      COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2  
 TITLE: SECY/DSB Dist: Public Comment on Proposed Rule (PR)-Misc Notice; Reg G

### NOTES:

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
INTERNAL: <u>FILE CENTER</u> 01	1	NMSS/IMOB T8F5	1
OGC/DR 15-B-18	1	RES DIR	1
RES/DRA/DEPY	1	RES/DST	1
EXTERNAL: NRC PDR	1		

### NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL  
 DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM  
 DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR      7      ENCL 0

P  
R  
I  
O  
R  
I  
T  
Y  
  
2  
  
D  
O  
C  
U  
M  
E  
N  
T

DS09

Jim Shapake

L. Kopp

Indiana Michigan  
Power Company  
PO Box 16631  
Columbus, OH 43216

60 FR 54712

10/25/95

#9



INDIANA  
MICHIGAN  
POWER

RECEIVED  
1995 DEC 13 PM 2:32  
RULES REVIEW DIVISION  
USNRC

December 11, 1995

AEP:NRC:1240

Docket Nos.: 50-315  
50-316

Chief, Rules Review & Directives Branch  
U. S. Nuclear Regulatory Commission  
Mail Stop T-6D-69  
Washington, DC 20555-0001

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2  
COMMENTS ON DRAFT GENERIC LETTER 83-11, SUPPLEMENT 1  
(LICENSEE QUALIFICATION FOR PERFORMING SAFETY ANALYSES)

In the October 25, 1995, Federal Register Notice (60 FRN 54712), the NRC promulgated a draft set of revised guidelines to licensees who wish to perform their own safety and reactor core design analyses. This set of guidelines would replace those in Generic Letter (GL) 83-11, issued February 8, 1983. The purpose of this letter is to provide comments regarding the draft guidelines.

We concur with the NRC's decision to shorten the review and approval process by eliminating the need to submit detailed topical reports. We believe the guidelines provided in Attachment 1 to the generic letter supplement will continue to assure that the design analysis is performed using a valid methodology. Also, the new approach will save limited NRC resources currently required for methodology review and result in more efficient use of utility resources if there is no waiting period after completion of the methodology work.

As a recommended clarification on one of the points given in the generic letter supplement, the following comment is provided.

9512140224 951211  
PDR ADOCK 05000315  
Q PDR

140020

1/0

Comment - Attachment 1 to the draft generic letter supplement provides guidelines for licensees to use approved codes. Section 2.1 in Attachment 1 states: "The only codes and methods that are addressed by this process are those that the NRC has reviewed and approved." Different versions of previously approved codes (e.g., core design codes) that have been modified by the vendor to correct errors or to incorporate enhancements to the codes should be acceptable. It is suggested that, as long as the calculational methodology is not changed, the licensee should be able to use the new version of the code.

Sincerely,



E. E. Fitzpatrick  
Vice President

eh

cc: A. A. Blind  
G. Charnoff  
H. J. Miller  
NFEM Section Chief  
NRC Resident Inspector - Bridgman  
J. R. Padgett  
T. E. Tipton - NEI

