

# CATEGORY 1

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 FITZPATRICK, E.      American Electric Power Co., Inc.  
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SUBJECT: Clarifies emergency action level (EAL) statement as requested by NRC staff on 960926.

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September 27, 1996

AEP:NRC:1192D

Docket Nos.: 50-315  
50-316

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

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2  
PROPOSED EMERGENCY ACTION LEVELS  
RESPONSE TO REQUEST FOR CLARIFICATION  
(TAC NOs. M89878 and M89879)

The purpose of this letter is to clarify one emergency action level (EAL) statement as requested by your staff on September 26, 1996. The EAL statement S4 in the ALERT column, number 1, reads, "Loss of functions provided in OHP 4022.017.001, 'Loss of RHR Cooling'". Your staff proposed and we agree to the following change to statement number 1: "Loss of shutdown cooling as evidenced by entry into OHP 4022.017.001, 'Loss of RHR Cooling'".

Page 20 of 26, revision 2, of PMP 2080 EPP.101, "Emergency Classification" and the EAL basis document S4-ALERT page have been changed and are provided in the attachment to this letter.

We remain available to answer any additional questions that the NRC staff might have.

Sincerely,

E. E. Fitzpatrick  
Vice President

jen

Attachment

9610110372 960927  
PDR ADOCK 05000315  
F PDR

1045  
/

U. S. Nuclear Regulatory Commission  
Page 2

AEP:NRC:1192D

cc: A. A. Blind  
A. B. Beach  
MDEQ - DW & RPD  
NRC Resident Inspector - Bridgman  
J. R. Padgett



ATTACHMENT TO AEP:NRC:1192D

PMP 2080 EPP.101, "Emergency Classification"  
Page 20 of 26, Revision 2

EAL Basis Document, page S-4 - Alert

EMERGENCY CONDITION CATEGORIES

RECOGNITION CATEGORY: System Malfunctions					
ECC		UNUSUAL EVENT	ALERT	SITE AREA EMERGENCY	GENERAL EMERGENCY
S-4: INABILITY TO MAINTAIN A UNIT IN COLD SHUTDOWN  Mode 5,6	IC	NOT APPLICABLE	INABILITY TO MAINTAIN PLANT IN COLD SHUTDOWN	LOSS OF WATER LEVEL IN THE REACTOR VESSEL THAT HAS OR WILL UNCOVER FUEL IN THE REACTOR VESSEL	NOT APPLICABLE
	EAL	Not Applicable	<div>1. Loss of shutdown cooling as evidenced by entry into OHP 4022.017.001, "Loss of RHR Cooling"</div> <div>-AND-</div> <div>2. Temperature increase that either:<div>a. Exceeds Technical Specification cold shutdown limit of 200°F</div><div>-OR-</div><div>b. Results in an UNCONTROLLED increase in RCS temperature rise approaching the cold shutdown technical specification limit of 200°F.</div></div>	<div>1. Loss of functions provided in OHP 4022.017.001, Loss of RHR Cooling.</div> <div>-AND-</div> <div>2. Core uncover as Indicated by:<div>a. RVLIS NR &lt;44% - 0 RCPs</div><div>-OR-</div><div>b. Reactor Vessel Water Level &lt; 614 feet</div></div>	Not Applicable



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**DONALD C. COOK NUCLEAR PLANT  
BASIS FOR EMERGENCY ACTION LEVELS**

**ECC CATEGORY NAME, EMERGENCY CLASS AND DESCRIPTION**

**S-4: ALERT - INABILITY TO MAINTAIN A UNIT IN COLD SHUTDOWN**

**INITIATING CONDITION**

Inability to maintain plant in Cold Shutdown.

**MODE APPLICABILITY**

5 and 6

**EAL THRESHOLD VALUES**

1. Loss of shutdown cooling as evidenced by entry into OHP 4022.017.001, "Loss of RHR Cooling."

**-AND-**

2. Temperature increase that either
  - a. exceeds Technical Specification cold shutdown limit of 200°F

**-OR-**

- b. results in an UNCONTROLLED increase in RCS temperature rise approaching the cold shutdown technical specification limit of 200°F.

**BASIS (References)**

UNCONTROLLED - means a temperature increase that is not the result of a planned evolution. It is included to preclude the declaration of an emergency for circumstances where decay heat removal is intentionally removed from service and is controlled within the requirements of the technical specifications.

The threshold value indicates a substantial degradation in the level of safety of the plant by indicating a potential complete loss of the ability to removal decay heat in the Cold Shutdown and Refueling modes. NRC concerns expressed in Generic Letter 88-17,

**S4 - ALERT**

