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SUBJECT: Provides addl info re compliance w/NUREG-0737, Sections II.F.1-1 & II.F.1-2 & requests exemptions from sampling of effluent releases.

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July, 23, 1986
AEP:NRC:0678Y

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NUREG-0737, SECTIONS II.F.1-1 AND II.F.1-2:
FURTHER INFORMATION AND REQUESTS FOR EXEMPTION

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

Dear Mr. Denton:

The purpose of this letter is to provide further information on compliance with the requirements of NUREG-0737, Sections II.F.1-1 and II.F.1-2 at the Donald C. Cook Nuclear Plant and to request exemptions from certain provisions of those sections.

(1) The D. C. Cook Plant is in the process of upgrading their present iodine/particulate sampling capability to include continuous sampling of the unit vent effluent releases to meet the NUREG-0737, Section II.F.1-2 requirements. The system will consist of a GSP-1 unit, which is part of the Eberline AXM-1 monitoring system. Although the system will have the capability for continuous sampling, it is possible that during the course of an accident the iodine and particulate filters will require changing. If this is the case, continuous sampling will be interrupted briefly (for 2-3 minutes). Despite the possibility of this brief interruption, we feel that the intent of the NUREG-0737 requirement is met. We request your concurrence with our interpretation.

(2) NUREG-0737 Section II.F.1-2 requires a 30-minute sampling time for obtaining an iodine/particulate grab sample of effluent releases. We feel that a duration of 30 minutes is unnecessarily conservative and that such a long sampling time would raise ALARA concerns and could create difficulties for analysis. We believe that a sampling time of 2 to 3 minutes would be more practical and would enable plant personnel to obtain accurate information. We therefore request, as other utilities have done, an exemption from the requirement for a 30-minute sampling time.

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(3) In order to comply with NUREG-0737 requirements for noble gas effluent monitoring, the Eberline SPING monitoring system was installed at the D. C. Cook Plant. However, IE Information Notice 86-30, dated April 29, 1986, stated that SPING would be inappropriate for this purpose, since "its associated microcomputer is vulnerable to radiation damage from a total integrated dose greater than 1000 rads." The results of our analysis indicate that our noble gas monitors will not receive over 1000 rads of integrated dose during the course of an accident, and we therefore request your concurrence with our use of this system.

(4) The D. C. Cook Plant hired a consultant to redo the primary and transfer calibrations for the noble gas effluent monitors. Based on the consultant's analysis, the Xe-133 equivalent correction factor curve for the changes of the distribution of noble gases will be developed by October 31, 1986. However, the monitoring system does not have the capability to correct for the changing gas mixture prior to its reading out (displaying) or recording the noble gas concentration. At this time we plan for the Xe-133 equivalent correction curve either to be included in our Off-Site Dose Assessment Program (DAP) or to be implemented through procedures. We therefore request an exemption from the requirement stated in Table II.F.1-1 of NUREG-0737: "DISPLAY - Continuous and recording as equivalent Xe-133 concentrations or uCi/cc of actual noble gases."

(5) The containment exhaust pathway is through the unit vent, which is always diluted by the auxiliary building exhaust air. In addition, an analysis presented in the attachment to our letter AEP:NRC:0678W (dated June 23, 1986) showed that the noble gas concentration in the Steam Jet Air Ejector exhaust would not exceed 2×10^3 uCi/cc. We therefore request your concurrence that the design-basis maximum range of 1×10^4 uCi/cc for these two release pathways is acceptable.

At this time we believe that, with the exemptions requested above, along with the exemptions requested in our letters of April 14, 1986, May 20, 1986, June 23, 1986, and June 27, 1986, the D. C. Cook Plant radiation monitoring system meets the intent of Sections II.F.1-1 and II.F.1-2 of NUREG-0737. Our schedule for closing out and submitting Technical Specifications for these two sections is dependent on the Commission's response to the above requests for exemption and to the above letters.

Pursuant to the requirements of 10 CFR 170.12(c), we have enclosed an application fee of $150.00 for review of these exemption requests.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

M. P. Alexich
Vice President RBK 7/23/86

MPA/rjn
Attachment

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman