



INDIANA & MICHIGAN ELECTRIC COMPANY

DONALD C. COOK NUCLEAR PLANT
P.O. Box 458, Bridgman, Michigan 49106
(313) 465-5901

July 20, 1981

Mr. J.G. Keppler, Regional Director
Office of Inspection and Enforcement
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137



Operating License DPR-74
Docket No. 50-316

Dear Mr. Keppler:

I have attached a Licensee Event Report (81-028) which reports a small service water system leak which we found in the Unit 2 Containment ventilation cooling coil drain valve. The leakage amounted to 3 drops per 5 seconds from a bonnet-to-body leak on a 1" drain valve. Upon the advice of one of the on-site NRC resident inspectors, I reported this to you within 24 hours on July 10 as required by IE Bulletin 80-24.

We have again reviewed IE Bulletin 80-24. We question whether the NRC Staff expected that minor leakage of this nature should be reported under this Bulletin. The purpose of the Bulletin as we understand it is to require the licensee to promptly report any situation where a leak could develop into an uncontrolled leakage into the Containment Building. We have reviewed the design of the 1" screwed bonnet drain valve. We believe this reported bonnet-to-body leak could not have developed into any further significant leakage. Therefore, it does not appear to us that it should be reported for the purposes of IE Bulletin 80-24.

We request your clarification of the reporting requirements of IE Bulletin 80-24. Licensee Event Reports of this type cloud the real value of a safety-related reporting system. In addition, manpower is expended which could better be expended on more important functions.

Sincerely,

D.V. Shaller
Plant Manager

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cc: See Attached Distribution

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