



**INDIANA & MICHIGAN ELECTRIC COMPANY**

DONALD C. COOK NUCLEAR PLANT  
P.O. Box 458, Bridgman, Michigan 49106  
(616) 465-5901

April 11, 1983

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

Operating License DPR-74  
Docket No. 50-316

Dear Mr. Keppler:

This is to confirm the verbal report of the following occurrence given at 1555 hours on April 11, 1983, to Mr. John Streeter of your staff.

During a discussion with Westinghouse of proposed Technical Specification changes for Unit 1, Cycle 8, the potential of violating the Tav<sub>g</sub> assumption in DNB safety analysis of both Unit 1 and Unit 2 was revealed. Technical Specification 3/4.2.5 applies. For Unit 2 the DNB analysis assumed a maximum Tav<sub>g</sub> of 578°F. The Technical Specification limit is also 578°F. This does not allow for instrumentation inaccuracies when surveillance 4.2.5.1 is completed. (An Operator could obtain a meter reading of 578°F and the temperature could actually be 580.5°F. The incremental difference of 2.5°F would result from instrument inaccuracy. This would violate the assumption of the safety analysis.)

Investigation showed this problem not to exist for Unit 1 because the safety analysis assumed a Tav<sub>g</sub> of 576°F, which includes allowance for instrumental inaccuracy and operational fluctuation above the Technical Specification limit of 571.8°F.

A change has been written to the Operations Daily and Shift Surveillance Checks, which reduces the Reactor Coolant System Tav<sub>g</sub> limit for Unit 2 from 578°F to 575.5°F, to allow for instrument inaccuracy.

This report is made under T.S. 6.9.1.12b. Although not strictly applicable, the potential existed for operation of the Unit in a manner less conservative than the limits established in the Technical Specifications. A complete report will be submitted in fourteen (14) days.

Sincerely,

  
W. G. Smith, Jr.  
Plant Manager

cc: See attachment

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