



November 13, 2000

C1100-12
10 CFR 50.90

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2
APPLICABILITY OF PROPOSED HIGH ENERGY
LINE BREAK METHODOLOGY CHANGE FOR USE OF A SPECIFIC
CRACK EXCLUSION IN UNIT 1

Reference: Letter from R. P. Powers (I&M) to Nuclear Regulatory Commission Document Control Desk, C0400-06, Donald C. Cook Nuclear Plant Units 1 and 2, "License Amendment for Changes in High-Energy Line Break Methodology," dated April 6, 2000.

This letter confirms that a previously submitted license amendment request to incorporate a new crack exclusion methodology in the Donald C. Cook Nuclear Plant (CNP) high-energy line break (HELB) program applies to a section of Unit 1 steam generator blowdown (SGBD) piping located in the normal blowdown flash tank room.

In the referenced letter, Indiana Michigan Power Company (I&M), the Licensee for CNP Units 1 and 2, requested an amendment to Facility Operating Licenses DPR-58 and DPR-74 to incorporate three methodology changes in the CNP HELB program. In one of the requested methodology changes, I&M proposed to apply stress analyses based on ANSI B31.1.0-1967 for use with the NUREG-0800, "Standard Review Plan [SRP]," Section 3.6.2, "Determination of Rupture Locations and Dynamic Effects Associated with the Postulated Rupture of Piping," and its associated Branch Technical Position (BTP), MEB 3-1, "Postulated Rupture Locations in Fluid System Piping Inside and Outside Containment," Section B.1.e, crack exclusion methodology. I&M proposed to apply this crack exclusion methodology to a portion of SGBD piping located in the normal blowdown flash tank room for Unit 2. The use of this methodology

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will allow I&M to eliminate the postulation of critical cracks in this piping based on an acceptable stress analyses.

I&M stated in the referenced letter that application of the crack exclusion methodology may also be needed for the corresponding Unit 1 SGBD piping, and that modifications may be required for the SGBD piping and pipe supports. I&M stated that further analysis was needed to make this determination, and requested approval to use the SRP crack exclusion methodology for Unit 1, if necessary.

I&M has completed additional analysis and has determined that SGBD piping modifications are not needed for Unit 1. However, modifications are needed for pipe supports for the Unit 1 SGBD piping. These modifications are scheduled for completion prior to Mode 4. Furthermore, I&M has determined that approval to apply the SRP crack exclusion methodology is needed for the Unit 1 SGBD piping to eliminate the postulation of critical cracks in this piping based on an acceptable stress analysis. Therefore, I&M confirms that its request for approval to use crack exclusion methodology as described in the referenced letter is applicable to the Unit 1 SGBD piping located in the normal flash tank room. I&M's justification for use of this methodology remains as described in the referenced letter.

I&M has determined that the evaluation of significant hazards considerations, as contained in Attachment 2 to the referenced letter, is not affected by the information provided in this letter. No new commitments are identified in this letter.

A copy of this letter is being transmitted to the Michigan Public Service Commission and Michigan Department of Environmental Quality, in accordance with the requirements of 10 CFR 50.91.

Should you have any questions concerning this subject, please contact Mr. Wayne J. Kropp, Director of Regulatory Affairs, at (616) 697-5056.

Sincerely,



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Vice President Nuclear Engineering

/dmb

c: J. E. Dyer
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