



August 26, 2004

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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  
REGULATORY GUIDE 1.97  
REVISED INFORMATION

Reference: Letter from M. P. Alexich, Indiana Michigan Power Company, to U. S. Nuclear Regulatory Commission, Document Control Desk, "Regulatory Guide 1.97, Revision 3," AEP:NRC:0773AB, dated October 5, 1988.

The purpose of this letter is to inform the Nuclear Regulatory Commission (NRC) of a deviation for a variable that Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, has added to the CNP list of Regulatory Guide 1.97, Revision 3 (RG 1.97) instrumentation (Referenced letter). RG 1.97, which was issued May 1983, provides guidance to licensees for complying with the NRC's regulations to provide instrumentation to monitor plant variables and systems during and following an accident in a light-water-cooled nuclear plant.

In April 2000, I&M added a new Type D variable to its list of RG 1.97 instrumentation. RG 1.97 defines Type D variables as those variables that provide information to indicate the operation of individual safety systems and other systems important to safety. These variables are to help the operator make appropriate decisions in using the individual systems important to safety in mitigating the consequences of an accident. The added variable, D-15b, "Steam Generator Pressure," uses the steam generator pressure gauge to indicate steam generator safety valve actuation (safety valve actuation is typically followed by a pressure decrease).

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RG 1.97 recommends that the range for the steam generator pressure gauge should be from zero (0) pounds per square inch gauge (psig) to a value that is 20 percent above the setting of the lowest safety valve setting. The lowest CNP Technical Specification (TS) safety valve setting is 1065 psig plus or minus three percent. Therefore, the RG 1.97 recommended range would be 0 to 1316 psig (120 percent of the nominal setting plus three percent tolerance). The CNP steam generator pressure gauge, however, has a range of 0 to 1200 psig.

I&M has concluded that the steam generator pressure gauge range of 0 to 1200 psig is acceptable. The basis for the conclusion is:

Safety valve settings of 1065, 1075, and 1085 psig plus or minus three percent are required by both the Unit 1 and Unit 2 TSs.

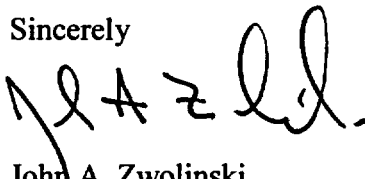
Safety valve actuations typically result in a pressure decrease.

The 0 to 1200 psig range is adequate to indicate a pressure decrease when the safety valves activate at the TS required settings.

The CNP Response-to-Steam-Generator-Overpressure procedure provides operator actions when any steam generator pressure exceeds 1090 psig. The 0 to 1200 psig range bounds this value.

This letter contains no new commitments. Should you have any questions, please contact Mr. Michael K. Scarpello, Nuclear Licensing Supervisor, at (269) 697-5020.

Sincerely



John A. Zwolinski  
Safety Assurance Director

RV/rdw

c: J. L. Caldwell, NRC Region III  
K. D. Curry, Ft. Wayne AEP  
J. T. King, MPSC  
J. G. Lamb, NRC Washington, DC  
MDEQ – WHMD/HWRPS  
NRC Resident Inspector