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 AUTH. NAME AUTHOR AFFILIATION
 ALEXICH, M. P. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Advises that unless contrary NRC instructions received by 860505, util will begin following new interpretation of Tech Spec 3/4.7.51 re control room emergency ventilation sys, as applied to pressurization, per 860402 discussion, Fee paid.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

April 8, 1986
AEP:NRC:0975B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
CONTROL ROOM VENTILATION SYSTEM; INTERPRETATION OF TECHNICAL
SPECIFICATION PRESSURE BOUNDARY REQUIREMENTS

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 document our interpretation of Technical Specification (T/S) 3/4.7.5.1 (Control Room Emergency Ventilation System) as it applies to Control Room pressurization.

T/S 4.7.5.1.e.3 requires the Control Room emergency ventilation system to be capable of maintaining the Control Room at a positive pressure of at least 1/16 inch W.G. relative to the outside atmosphere. The action statements of T/S 3.7.5.1 address the heating and cooling systems, the pressurization fans, and the filter train. They do not, however, specifically address the pressure boundary.

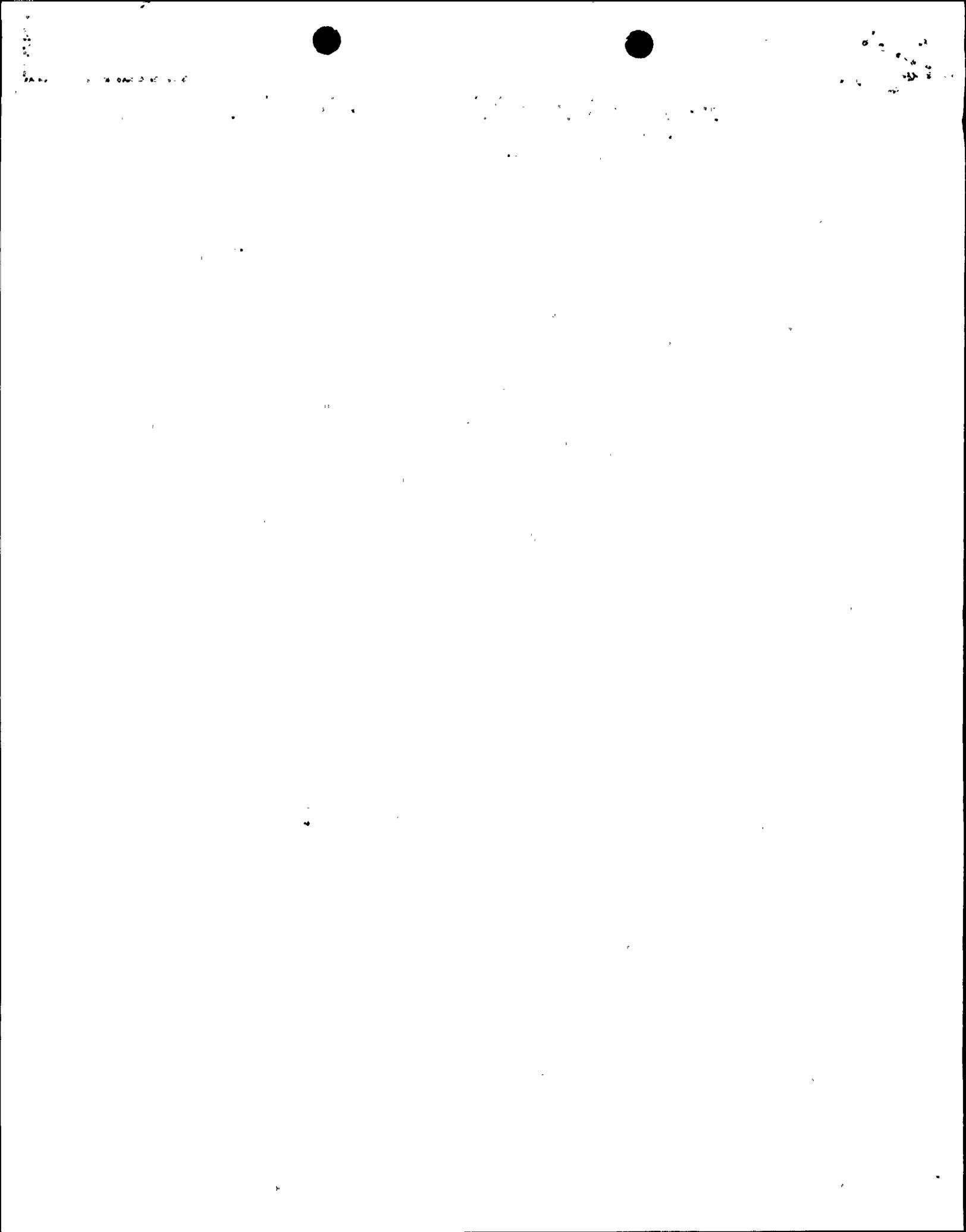
In the past, we have applied T/S 3.0.3 when we were unable to meet pressurization requirements. This T/S requires us to begin shutting down the unit within one hour, and thus makes repairs to an inoperable pressure boundary virtually impossible while maintaining the unit at power.

After reexamining the T/S more thoroughly, we believe that our interpretation has been unnecessarily restrictive, and that the more correct approach would be to treat the pressure boundary as a part of the filter train. This is because the pressure boundary functions to minimize the amount of air that enters the Control Room without passing through the filter train. With this interpretation, we are allowed 24 hours to restore the pressure boundary to operable status before the unit must be shut down. We note that we do not interpret the pressurization fan action statement as applicable, because it addresses inoperability of one of the two redundant fans, whereas the pressure boundary, like the filter train, is not redundant.

This interpretation was discussed with Mr. J. Hayes of your staff during his April 2, 1986 visit to the D. C. Cook Plant. It is our intent to follow our present interpretation until May 5, 1986. At that time, unless we have received instructions from you to the contrary, we will begin following the interpretation described in this letter.

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Mr. Harold R. Denton

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Pursuant to 10 CFR 170.12(c), we have enclosed an application fee of \$150.00.

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

BRS
4/17/86

MPA/rjn

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

