

REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 7911020283 DOC. DATE: 79/10/25 NOTARIZED: NO DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME AUTHOR AFFILIATION
 DOLAN, J. E. Indiana & Michigan Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation

SUBJECT: Forwards response to 790801 request to institute license condition requiring implementation of secondary side water chemistry monitoring & control program. Such program already in effect & no fee is required for formalization.

DISTRIBUTION CODE: A001S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: General Distribution for after Issuance of Operating Lic

NOTES: I & E - 3 CYS. ALL MATL.

ACTION:	RECIPIENT	COPIES		RECIPIENT	COPIES	
	ID CODE/NAME	LTTR	ENCL	ID CODE/NAME	LTTR	ENCL
ACTION:	05 BC ORB #1	7	7			
INTERNAL:	01 REG FILE	1	1	02 NRC PDR	1	1
	12 I&E	2	2	14 TA/EDO	1	1
	15 CORE PERF BR	1	1	17 ENGR BR	1	1
	18 REAC SFTY BR	1	1	19 PLANT SYS BR	1	1
	20 EEB	1	1	21 EFLT TRT SYS	1	1
	22 BRINKMAN	1	1	OELD	1	0
EXTERNAL:	03 LPDR	1	1	04 NSIC	1	1
	23 ACRS	16	16			

NEW 61050

MA
4

TOTAL NUMBER OF COPIES REQUIRED: LTTR 41 ENCL 40
 38 37

GD

INDIANA & MICHIGAN POWER COMPANY

P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

October 25, 1979
AEP:NRC:00262

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

This letter serves to respond to Mr. A. Schwencer's letter dated August 1, 1979 wherein we were requested to institute a license condition requiring implementation of a secondary side water chemistry monitoring and control program. Upon implementation of such a license condition, present technical specifications on Secondary Side Chemistry, and the surveillance requirements associated with those technical specifications, would be deleted.

A program for the monitoring of secondary side water chemistry has been in effect for some time at the Cook Plant. Plant procedures and/or administrative controls are in effect for all areas of concern addressed in the enclosure, "Model License Condition," to Mr. Schwencer's letter. We would like to point out that the concerns addressed in Mr. Schwencer's letter are similar to those expressed in our response to Mr. D. L. Ziemann's letter of September 10, 1976, regarding the implementation of secondary side water chemistry Technical Specifications. Our response to Mr. Ziemann's letter, dated November 29, 1976, stated that implementation of Technical Specifications on secondary side chemistry would limit the flexibility to stabilize, interpret, and correct any unusual secondary side chemistry condition. The existing secondary side water chemistry monitoring and control program and the associated procedures and administrative controls that are maintained at the Cook Plant, provide sufficient assurance that proper attention is being given to the control of secondary side chemistry in order to assure the long term integrity of the steam generator tubes. These are available to your staff for inspection.

*Acc 1
5/11*

7911020 283

P

We understand that the proposed license condition would not be violated in the event that chemical analyses were to reveal non-compliance with the prescribed limits of a given parameter provided that the appropriate actions, as described in the applicable procedure(s), were taken.

Upon implementation of the proposed license condition, the Technical Specifications listed below should be deleted.

Unit No. 1

- Technical Specifications 3.7.1.6, 4.7.1.6 and Table 3.7-3 on pages 3/4 7-11 through 3/4 7-13.

Unit No. 2

- Technical Specifications 3.7.1.6, 4.7.1.6, and Table 3.7-3 on pages 3/4 7-10a through 3/4 7-10c.

The proposed license condition contained in the attachment to this letter, and the technical specification revisions shown above have been reviewed by the Plant Nuclear Safety Review Committee (PNSRC) and the AEPSC Nuclear Safety and Design Review Committee (NSDRC). As a result of their respective reviews, both the PNSRC and the NSDRC have concluded that institution of the license modifications described herein will have no adverse effect on the health and safety of the general public.

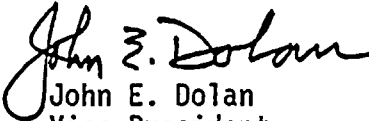
Modifications, when needed, to the plant procedures and/or administrative controls for the secondary side water chemistry monitoring and control program will be made subsequent to review by the appropriate members of IMPCo. and/or AEPSC.

Additional guidance concerning the assessment of fees for proposed license amendments was transmitted to us in the attachments to Mr. W. O. Miller's letter of July 12, 1979. Footnote (1) to 10 CFR 170.22 states that "license amendments or approvals resulting from Commission Orders issued pursuant to 10 CFR 2.204 ... are not subject to these (170.22) fees, except as provided in footnote (1) to 170.21." Part 170.21 is not applicable to this submittal. Footnote (2) further states that "Class I, II or III amendments which result from a written Commission request for the application may be exempt from fees when the amendment is to simplify license or technical specifications, the amendment has only minor safety significance, and is issued for the convenience of the Commission."

As stated previously in this letter, a program for the monitoring and control of secondary side water chemistry has been in effect for some time at the Cook Plant. Thus, the implementation of a License Condition will only serve to formalize with the NRC our existing internal requirements for secondary side water chemistry monitoring and control. Such formalization does not involve any environmental, safety, or other issue for the Cook Plant.

For reasons cited above, IMPCo interprets 10 CFR 170 as requiring that no fee accompany this submittal.

Very truly yours,


John E. Dolan
Vice President

JED:ab

cc: R. C. Callen
G. Charnoff
R. S. Hunter
R. W. Jurgensen
D. V. Shaller - Bridgman

(ATTACHMENT TO AEP:NRC:00262)

DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2
DOCKET NOS. 50-315 and 50-316
LICENSE NOS. DPR-58 and DPR-74

PROPOSED LICENSE CONDITION

ON SECONDARY SIDE WATER CHEMISTRY MONITORING

Indiana & Michigan Power Company and Indiana & Michigan Electric Company (the licensees) shall implement a secondary side water chemistry program to inhibit steam generator tube degradation. This program shall define the process sampling points and sampling schedules for the monitoring of critical secondary side parameters. The procedures and/or administrative controls used to quantify parameters, control the recording and management of data, define corrective actions for off control point chemistry conditions, and identify the authority responsible for the interpretation of the data shall be made part of the program.