



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

08 APR 1986

Docket Nos.: 50-315  
and 50-316

Mr. John Dolan, Vice President  
Indiana and Michigan Electric Company  
c/o American Electric Power Services  
Corporation  
1 Riverside Plaza  
Columbus, Ohio 43216

Dear Mr. Dolan:

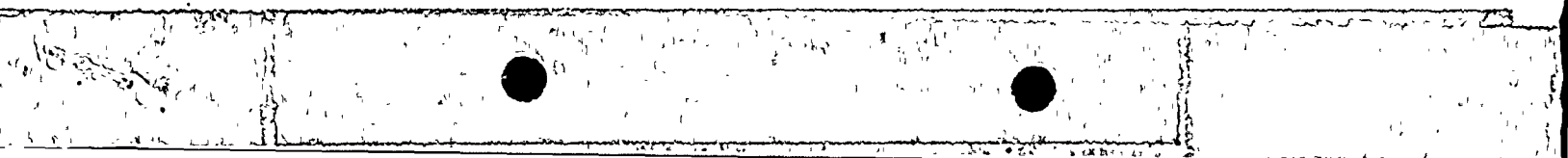
Subject: Interpretation of Technical Specifications that Apply to Borated  
Water Addition to the Reactor Coolant System from the Refueling  
Water Storage Tank

By letter dated February 28, 1986, the Indiana and Michigan Electric Company advised the NRC of an interpretation of several technical specifications as they apply to borated water addition to the reactor coolant system from the refueling water storage tank.

The refueling water storage tank (RWST) is a dedicated source of borated water to replenish the primary system whenever required (during all modes and throughout the fuel cycle). The boron concentration in the RWST is controlled by Technical Specification limits and is based on meeting the 5 percent shutdown margin on reactivity for refueling (Mode 6). The required shutdown margin for other modes is less and is also controlled by Technical Specification with the minimum of 1.0 percent required for operation (Mode 1). Therefore the 5% requirement for refueling is more than enough for other modes including operation. Even in the unusual event that the concentration in the RWST is less than that in the primary system, we would not be concerned about boron dilution or mixing. We find the IMEC interpretation of the existing Technical Specifications to be correct.

On March 14 and 27, 1986, IMEC submitted proposed Technical Specifications to, among other things, clarify this interpretation and to account for RHR operation with new fuel in the core; this latter change being a reported overconservatism as a result of recent boron dilution analyses by IMEC. These changes do not change the boron concentration of the RWST and therefore do not influence the above interpretation. We are in the process of reviewing the proposed changes and agree that some clarification of the

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Mr. John Dolan  
Indiana and Michigan Electric Company

Donald C. Cook Nuclear Plant

cc:  
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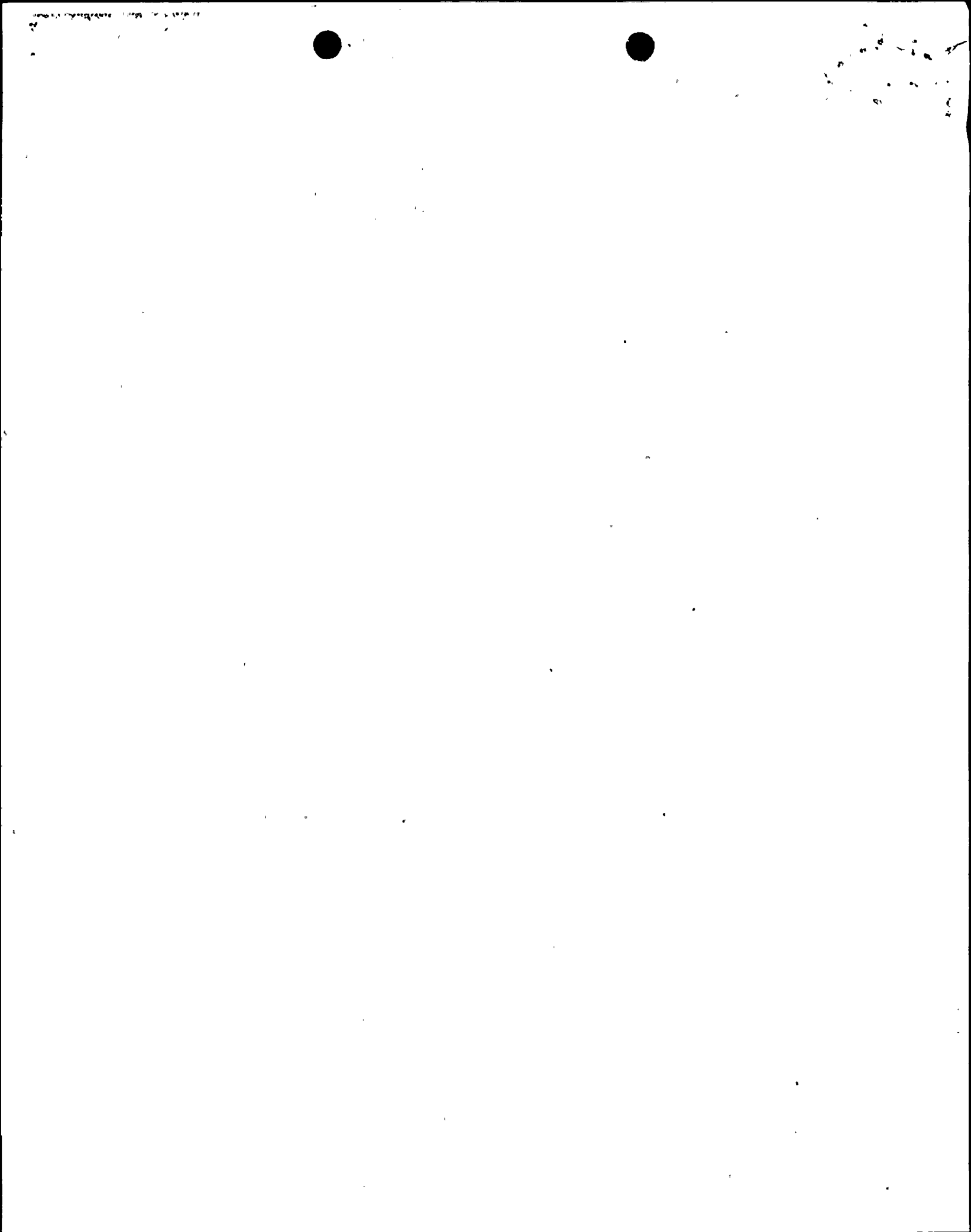
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Mr. John Dolan

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08 APR 1986

Technical Specifications may be helpful for future operations, however, this clarification proposal by IMEC is not a required replacement of this interpretation. If you have any questions on this matter, please let me know.

Sincerely,

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B. J. Youngblood, Director  
PWR Project Directorate #4  
Division of PWR Licensing-A

cc: See next page

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