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 ALEXICH, M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
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 MURLEY, T.E. Document Control Branch (Document Control Desk)

SUBJECT: Requests addl time to prepare plant-specific evaluation of
 surge line in order to complete ongoing work, perform reviews
 & prepare submittal, in response to NRC Bulletin 88-011.
 Evaluation will be submitted by 910401.

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 TITLE: Bulletin 88-11 Pressurizer Surge Line Thermal Stratification

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Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
JUSTIFICATION FOR CONTINUED OPERATION REGARDING
PRESSURIZER SURGE LINE STRATIFICATION

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Attn: T. E. Murley

January 30, 1991

Dear Dr. Murley:

References:

- 1) B. J. Coslow, "Westinghouse Owners Group Bounding Evaluation for Pressurizer Surge Line Thermal Stratification," WCAP-12277 (Westinghouse Proprietary Class 2), WCAP-12278 (Non-Proprietary Version), June 1989.
- 2) B. J. Coslow, "Westinghouse Owners Group Pressurizer Surge Line Thermal Stratification Generic Detailed Analysis Program MUHP-1091 Summary Report," WCAP-12639 (Westinghouse Proprietary Class 2), WCAP-12640 (Non-Proprietary Version), June 1990.
- 3) SER from NRC on WCAP-12277 as per WOG letter OG-90-56, September 4, 1990.

In order to address the issue of surge line thermal stratification and respond to NRC Bulletin 88-11, the Westinghouse Owners Group (WOG) implemented a program to generically evaluate the effects of stratification on surge line integrity (Reference 1). This bounding evaluation compared WOG plants to those for which detailed plant-specific analysis had been performed. Since Reference 1 provided less than full design life verification, a generic justification for continued operation (JCO) was developed for use by each of the WOG plants. This JCO was reviewed and accepted by the NRC (Ref. 3). Subsequent to the bounding evaluation and generic

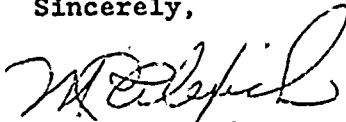
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JCO, the WOG performed a generic, detailed analysis on groupings of plants based on their similarity of response to thermal stratification (Reference 2). The results of this generic, detailed analysis could not show acceptable fatigue life for the Cook Nuclear Plant units. Therefore, a plant-specific JCO was developed by Westinghouse which justified continued power operation of the Cook Nuclear Plant for an additional 10 heatup and cooldown cycles.

The WOG detailed analysis (Reference 2) was completed in July of 1990 and was reviewed by the NRC in November of 1990. By November 1990, we had already initiated a program to complete the plant-specific evaluation of the surge line, required by NRC Bulletin 88-11 to be submitted by January 31, 1991. Although this program was initiated prior to November 1990, completion could not be planned until NRC feedback on the WOG detailed analysis (Reference 2) was obtained. Based on the NRC's November review of Reference 2, we can now complete the program. In order to do so, however, we request additional time to allow for completion of on-going work, review by appropriate parties, and preparation and submittal of the reports. Accordingly, we request that the date for our plant-specific submittal be extended to April 1, 1991.

This letter has been prepared following Corporate procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,



M. P. Alexich
Vice President

ldp

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
A. B. Davis - Region III
NRC Resident Inspector - Bridgman
NFEM Section Chief

