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SUBJECT: Forwards request for clarification re Tech Spec 3.9.10,
 on reactor vessel water level requirements for operation
 in MODE 6 issued w/Amends 59 & 78 issued.

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January 30, 1984

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Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
REQUEST FOR TECHNICAL SPECIFICATION CLARIFICATION
REACTOR VESSEL WATER LEVEL

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

Dear Mr. Denton:

Pursuant to our conversation with your staff, this letter provides our formal request for your clarification of Technical Specification (T/S) 3.9.10, on the reactor vessel water level requirements for operations in MODE 6, which was issued under Amendment Nos. 78 and 59 for our Unit Nos. 1 and 2, respectively. The need for this clarification became apparent because Rod Cluster Control Assembly (RCCA) movements within fuel assemblies are required during the removal and installation of the Upper Internals in MODE 6. This is performed with less than 23 feet of water above the reactor pressure vessel flange. Below is a description of some of the operations which are performed in MODE 6 to remove the upper internals. Please consider these operations when making your clarification of T/S 3.9.10.

Prior to the removal of the Upper Internals, the control rod drive shafts must be unlatched. The unlatching is accomplished using a tool suspended from the refueling crane. During this operation, there is about 12 to 14 feet of water over the reactor pressure vessel flange, and 24 feet of water over the fuel. The control rod drive shaft is "grabbed" by the unlatching tool, then both the RCCA and its drive shaft are lifted approximately 8 feet, and then are weighed. The RCCA and its drive shaft are then lowered and decoupled from one another. The control rod drive shaft is then lifted and weighed to verify that it had been unlatched from the RCCA. The reverse of this operation is required for reinstallation of the Upper Internals.

The RCCA and its drive shaft are physically restrained from being lifted more than approximately 13 feet, or 1 foot above the fuel by the Upper Internals. There are guides in the Upper Internals that direct the rodlets back into the fuel, and thereby prevent any misalignment.

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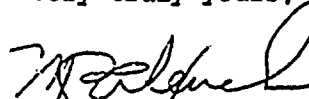
During normal operation, the fuel will absorb the energy of the falling RCCA via a dash pot arrangement at the lower portion of the rod travel and the spring "shock absorber" in the RCCA hub. If the RCCA is dropped and the rodlets were misaligned, it is our opinion that they would bend and absorb most of the energy.

It is obvious from the above description that there are operations during MODE 6 when we are not able to maintain at least 23 feet of water over the top of the reactor pressure vessel flange. We believe this type of operation was considered and allowed by the NRC staff when they included the statement in the BASES for T/S Section 3/4.9.10 and 3/4.9.11 WATER LEVEL - REACTOR VESSEL AND STORAGE POOL that stated: "Water level above the vessel flange in MODE 6 will vary as the reactor vessel head and the system internals are removed. The 23 feet of water are required before any subsequent movement of fuel assemblies or control rods."

Based on the above statement in the BASES, in conjunction with our own internal review process, we believe this Technical Specification to mean that operations in the above described manner are permitted, do not constitute an unreviewed safety question as defined in 10 CFR 50.59, and will not adversely affect the health and safety of the public. Your concurrence in this interpretation is requested principally because the words of the Technical Specification itself do not address such operations.

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

RBK
1/30/84

MPA/cm

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

