INDIANA \& MICHIGAN ELECTRIC COMPANY
DONALD C. COOK NUCLEAR PLANT
P.O. Box 458, Bridgman, Michigan 49106
(616) 465-5901


September 24, 1982

Mr. J. G. Keppler, Regional Administrator United States Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, IL 60137

Operating License No. DPR-58
Docket No. 50-315
Dear Mr. Keppler:
We have been informed by Exxon Nuclear Company (ENC) that an inconsistency exists in the D. C. Cook Unit 1 ECCS analysis. The Technical Specification (T/S) value of $70^{\circ} \mathrm{F}$ (T/S 3.5.5) was used as the temperature of the Safety Injection (SI) flow water, but a value of $80^{\circ} \mathrm{F}$ was used for the Containment Spray Water temperature. This is non-conservative with respect to the Unit 1 ECCS analysis and is contrary to what is stated on Page B 3/4 5-3 (T/S B $3 / 4.5 .5$ ) of the Unit $1 \mathrm{~T} / \mathrm{S}$. We are reporting this inconsistency and the resulting non-conservative ECCS analysis to you in accordance with T/S 6.9.1.8.h.

While we are pursuing this matter with ENC, we will administratively keep the Refueling Water Storage Tank (RWST) temperature above $80^{\circ} \mathrm{F}$, since it is the water source for spray and SI flow, to validate the $80^{\circ} \mathrm{F}$ assumption of Spray Water temperature. Raising the RWST temperature from $70^{\circ} \mathrm{F}$ to $80^{\circ} \mathrm{F}$ is conservative with respect to the SI flow and hence, operation in this manner is not inimical to the health and safety of the general public.

Any violations of this administrative limit to Technical Specification 3.5.5.c will be reported to the Regional Administrator, Region III, in accordance with the requirements of Technical Specifications 6.9.1.9 and 6.9.1.8 as applicable.

> C. 1 . $n$ th, Jr.
> W. G. Smith,
> Plant Manager

WGS: frb

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cc: J. E. Dolan
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