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 HUNTER, R.S. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests change to 820802 application for amend to License
 DPR-58 & DPR-74, consisting of proposed changes to Tech Specs
 3.7.9.3 re fire protection sys.

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INDIANA & MICHIGAN ELECTRIC COMPANY

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

November 23, 1982
AEP:NRC:0660F

Donald C. Cook Nuclear Plant Units Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
TECHNICAL SPECIFICATION CHANGE REQUEST - FIRE PROTECTION

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

Reference: AEP Letter AEP:NRC:0660D dated August 2, 1982

Dear Mr. Denton:

This letter and its Attachments request a change to Technical Specification (T/S) 3.7.9.3 of the Donald C. Cook Nuclear Plant Units Nos. 1 and 2 which amends the previous changes requested for the same T/S in the Reference letter.

Attachment No. 1 to this letter contains the justification for the proposed Technical Specification change for both Unit Nos. 1 and 2. Attachment No. 2 to this letter contains the revised T/S pages. It should be noted that the attached amended pages reflect the changes proposed in this letter, as well as those changes previously proposed in the reference letter. All changes are indicated by vertical bars drawn on the right hand margin of the page.

These proposed changes have been reviewed and approved by the Plant Nuclear Safety Review Committee (PNSRC) and will be reviewed by the AEPSC Nuclear Safety and Design Review Committee at their next meeting.

We request that you process this letter in as expeditious a manner as possible for the reasons indicated in Attachment 1. We interpret that the fee transmitted with the Reference covers the processing of this request.

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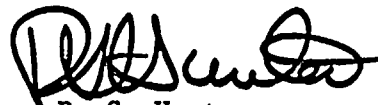
Mr. Harold R. Denton

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AEP:NRC:0660F

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,

A handwritten signature in dark ink, appearing to read 'R. S. Hunter', written in a cursive style.

R. S. Hunter
Vice President

RSH/sag

cc: John E. Dolan - Columbus
M. P. Alexich
R. W. Jurgensen
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
Joe Williams, Jr.
NRC Resident Inspector at Cook Plant - Bridgman

Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains. The *Agrobacterium* strains were grown in the YEA medium for 24 h at 28 °C. The cell concentration of the strains was adjusted to 1.0 × 10⁸ cells/ml. The cell suspension was mixed with the plant tissue and the transformation efficiency was determined. The results were expressed as the mean ± SD of three independent experiments. The different letters indicate significant differences ($P < 0.05$) according to the Duncan's multiple range test.

[illegible]

ATTACHMENT 1 TO AEP:NRC:0660F
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2
JUSTIFICATION FOR PROPOSED TECHNICAL SPECIFICATIONS
FIRE PROTECTION SYSTEM

Technical Specification 3.7.9.3 for Both Unit Nos. 1 and 2.

1) The addition of Action Statement "a" will establish new operation requirements for whenever one or more of the low pressure CO₂ systems are isolated for personnel protection. This also makes the previous Action Statement "a", Action Statement "b" and the previous Action Statement "b", Action Statement "c". The proposed Action Statement "a" requires either the verification that the fire detection system is operable (as per Specification 4.3.3.7 for Unit 1, or as per Specification 4.3.3.8 for Unit 2), or the establishment of an hourly fire watch patrol whenever one or more low pressure CO₂ systems are isolated. This Statement will relieve us from the requirement of performing a continuous fire watch under these conditions.

Presently, whenever a CO₂ system is isolated to permit entry for tours, maintenance, construction, or surveillance testing, a continuous fire watch is posted in each affected fire zone. This means that isolation of a CO₂ system serving several fire zones presently requires several fire watches; that is, one fire watch for each zone affected by CO₂ system isolation. This requirement has resulted in a significant manpower expenditure, particularly when a CO₂ system serving multiple zones is temporarily isolated. For example, the present Technical Specification requires that four fire watches be posted in each of the 4KV switchgear complexes, or five watches be posted in each reactor cable tunnel when their respective automatic CO₂ systems are temporarily isolated. Thus, to permit personnel access simultaneously to both 4KV complexes and both cable tunnels, a total of eighteen (18) fire watches are required to support as few as four job sites per shift. Besides imposing a significant personnel burden, this requirement is also creating safety problems with regard to the accountability of the additional personnel required in each of these areas in the event of a fire or other emergency. By the addition of this Action Statement to our Technical Specifications, we will be eliminating the excessive amount of personnel in these areas, while still providing the necessary fire protection capabilities.

1i) Two changes are being proposed here for Action Statement "b", which was formerly Action Statement "a". These changes can be described as follows:

A) The changing of the requirement to establish a continuous fire watch with backup fire suppression equipment whenever one or more of the low pressure CO₂ systems listed in Table 3.7-6 is inoperable; to the requirement of establishing a continuous fire watch with backup fire suppression equipment to an area containing redundant safe shutdown systems or components whenever one or more of the low pressure CO₂ systems listed in Table 3.7-6 is inoperable. This proposed change was previously submitted in our letter AEP:NRC:0660D. As stated in that letter, approval of this proposed revision would remove unduly restrictive Action Statement which is not imposed on current Westinghouse plants.

THE HISTORY OF THE UNITED STATES

The history of the United States is a story of growth and change. From the first settlers to the present day, the nation has evolved through various stages of development. The early years were marked by exploration and settlement, followed by a period of rapid expansion and industrialization. The American Revolution was a pivotal moment in the nation's history, leading to the establishment of a new government and the declaration of independence. The Civil War was another major event, which resulted in the abolition of slavery and the preservation of the Union. The 20th century has been a time of significant progress, with the United States becoming a world superpower and a leader in many fields.

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B) The second change proposed to Action Statement "b" is a revision to a statement previously proposed in our letter AEP:NRC:0660D. Specifically, the change is the deletion of the statement "for other areas, establish an hourly fire watch"; and the insertion of the statement "for other areas ensure that backup fire suppression equipment is available and establish an hourly fire watch." The term "other areas" used in these statements refers to all the areas protected by one or more of the low pressure CO₂ systems listed in Table 3.7-6 which do not contain redundant safe shutdown systems or components. The insertion of the proposed statement is creating a new and more restrictive requirement for us to perform than the one proposed in our letter AEP:NRC:0660D. However, it still removes the unduly restrictive Action Statement of performing a continuous fire watch in areas where redundant safe shutdown systems or components do not exist.

ATTACHMENT 2 TO AEP:NRC:0660F
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2
PROPOSED TECHNICAL SPECIFICATION CHANGES
FIRE PROTECTION SYSTEM

