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DENTON,H.R. Office of Nuclear Reactor Regulation, Director
VARGA,S.A. NRC - No Detailed Affiliation Given

SUBJECT: Application to amend License DPR-58,revising Tech Spec 4.5.2.f to increase total flow limit to four branch lines from 470 gpm to 500 gpm on boron injection sys (single centrifugal charging pump).

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October 3, 1983
AEP:NRC:0849

Donald C. Cook Nuclear Plant Unit No. 1
Docket No. 50-315
License No. DRP-58
PROPOSED CHANGE TO TECHNICAL SPECIFICATION 4.5.2.f

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

Attention: Mr. Steven A. Varga

Dear Mr. Denton:

This letter requests a change to the Donald C. Cook Nuclear Plant Unit No. 1 Technical Specification (T/S) Surveillance Requirement 4.5.2.f. to increase the total flow limit to the four branch lines from 470 gpm to 500 gpm on the Boron Injection System (single centrifugal charging pump).

T/S 4.5.2.f currently requires performance of ". . . a flow balance test during shutdown following completion of modifications to the Emergency Core Cooling System (ECCS) subsystem that alter the subsystem flow characteristics." The footnote (*) to this T/S currently requires ". . . The actual flow in each (Boron Injection) BI line may deviate from the nominal so long as . . . the total flow to the four branch lines does not exceed 470 gpm."

The T/S Bases (B3/4.5.2) states, in part, "Surveillance requirements for . . . flow balance testing provide assurance that proper ECCS flows will be maintained in the event of a LOCA. Maintenance of proper flow resistance and pressure drop in the piping system to each injection point is necessary to: (1) prevent total pump flow from exceeding runout conditions when the system is in its minimum resistance configuration, (2) provide the proper split between injection points in accordance with the assumptions used in the ECCS-LOCA analyses, and (3) provide an acceptable level of total ECCS flow to all injection points equal to or above that assumed in the ECCS-LOCA analyses."

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On October 1, 1983, while performing the above surveillance requirements for flow balance testing on the centrifugal charging pumps, we found that one of the two pumps (i.e., the East pump) exceeded the maximum flow requirement. During the test, the system was set up to provide the proper flow split between injection points, and both pumps had an acceptable level of total flow to satisfy the minimum flow requirements. Further adjustment of the throttle valves in the piping configuration to allow the East pump to meet the maximum flow requirement will infringe upon the minimum flow requirement for the West pump.

In order to alleviate this situation, it would therefore require physical rework and retesting of the East pump to lower its performance to the extent that maximum flow came within T/S. Such rework and retesting is estimated to delay the Unit 1 startup by two weeks or longer. Therefore, on the basis of the need for power and the plant being subjected to an unnecessarily long shutdown, we request a technical specification change to allow us to operate in our "as tested condition".

The actual technical specification change request is included as Attachment 1 to this letter. The basis for that change is discussed in Attachment 2.

Based on our review, we have concluded that this change would not result in an increase to the probability or consequences of a previously-analysed accident, does not reduce a safety margin, and is clearly within all acceptable criteria with respect to the component. Since our conclusions are consistent with that published under the examples cited on page 14870 of Vol. 48, No. 67 of the Federal Register, it is therefore our belief that our proposed change will not constitute Significant Hazards Considerations as defined in 10 CFR 50.92.

This proposed change to Technical Specification has been reviewed and approved by the Plant Nuclear Safety Review Committee and will be reviewed by the Nuclear Safety and Design Review Committee at its next meeting.

As required by 10 CFR 50.91(b)(1), a copy of this application for a license amendment is being transmitted to the appropriate official of the State of Michigan.

AEPSC interprets 10 CFR 170.22 as requiring that a Class III Amendment Fee be paid for the change. A check in the amount of $4000 will be transmitted to you in a future letter.

Due to this letter being written on short notice, our Corporate procedures have not been followed during its preparation. We will review the letter according to our Corporate procedures and will inform you if any modification is required.

Very truly yours,

M. P. Alexich
Vice President

MPA/pb

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