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FACIL:50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
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RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to License DPR-74,consisting of proposed emergency change to Tech Spec 3.9.2 re refueling operations.

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April 24, 1984
AEP:NRC:0890

Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316
License Nos. DPR-74
PROPOSED EMERGENCY CHANGE TO TECHNICAL SPECIFICATION 3.9.2

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

Dear Mr. Denton:

Due to specific circumstances currently existing at D. C. Cook Nuclear Plant Unit 2, we are requesting an emergency change to the subject Technical Specification (T/S). Specifically, the T/S states:

> "As a minimum, two source range neutron flux monitors shall be operating, each with continuous visual indication in the control room and one with audible indication in the containment and control room.
>
> ACTION: With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or positive reactivity changes..."

The current circumstances at the Plant are:

(1) On Friday, April 20, 1984, during the Unit 2 refueling activities, one of the two source range neutron flux monitors began behaving erratically, rendering it inoperable.

(2) We have proceeded to partially dewater the refueling cavity to make repairs to the inoperable monitor. We have replaced the detector and are still unable to achieve successful operation.

(3) Defueling (CORE ALTERATIONS) activities were suspended with all but 30 fuel assemblies removed.

(4) Two of the remaining 30 fuel assemblies contain sources for startup of the reactor. Fifteen assemblies are near operable detector N31 and fifteen assemblies are near inoperable detector N32.

(5) Continued delays to fix the inoperable detector prior to completion of defueling would delay startup commensurately for no apparent safety reasons.

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Therefore, we are proposing that T/S 3.9.2 be amended to allow defueling of the remaining 30 assemblies during the current Unit 2 (1984) outage, with only one OPERABLE source range neutron flux monitor.

Based on our review of the current core conditions, we have concluded that the core multiplication factor (k-effective) will always be reduced by the removal of fuel assemblies and the commensurate replacement of 2000 ppm borated water. Therefore, we believe the remaining 30 fuel assemblies could be removed with only one OPERABLE source range neutron monitor and not create significant hazards consideration as defined 10 CFR 50.92. Specifically, the proposed change will not increase the probability or consequences of a previously-analyzed accident. The change may reduce in some way a safety margin, but it is clearly within the acceptance criteria for maintaining the core subcritical.

The Attachment to this letter contains the proposed revised T/S page. The change is indicated by vertical bars drawn on the right hand margin of the page.

The proposed change has been reviewed by the Plant Nuclear Safety Review Committee and will be reviewed by the Nuclear Safety and Design Review Committee at its next scheduled meeting.

Pursuant to the requirements of 10 CFR 50.91(b)(1), a copy of this letter and its attachment have been transmitted to Mr. R. C. Callen of the Michigan Public Service Commission.

We interpret this application for a license amendment to constitute a Class III Amendment as defined in 10 CFR 170.22. Therefore, a check in the amount of $4000.00 will be forwarded in the near future as payment for processing the aforementioned request.

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,

R. F. Hering
Vice President

Attachment

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