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

SUBJECT: Application for amend to License DPR-74, providing emergency change to Tech Specs to allow operation in Modes 3 & 4 w/only one fully operable battery.

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May 25, 1984
AEP:NRC:0893

Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316
License Nos. DPR-74
PROPOSED EMERGENCY CHANGE TO
TECHNICAL SPECIFICATION 3.8.2.3

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 the Donald C. Cook Nuclear Plant Unit 2, we are requesting an emergency change to the subject Technical Specification (T/S). Currently T/S 3.8.2.3 requires two OPERABLE 250 volt D. C. batteries in MODES 1, 2, 3, and 4. Surveillance Requirement 4.8.2.3.2.e. requires OPERABILITY to be demonstrated by verifying at least once per 60 months, that the battery capacity is at least 80% of the manufacturer's rating when subjected to a performance discharge test.

The required capacity discharge test was performed on battery "AB" on May 16, 1984 and on battery "CD" on May 10, 1984. Battery "CD" passed the 60 month test. Battery "AB" did not pass the 60 month test. Our performance discharge test is run for 6.4 hours (corrected for temperature). The capacity of the battery "AB" dropped below 80% after approximately five hours and thirty minutes. Based on our engineering review and acceptable T/S surveillance testing, battery "CD" has adequate capacity to carry all of it's emergency loads for a full 6.4 hour period.

We are requesting the subject T/S be amended to allow operation in MODES 4 and 3 with one fully OPERABLE battery. This amendment would allow us to perform activities that are required in these MODES prior to startup after refueling. Once a second fully OPERABLE battery is in place, this amendment will no longer be needed.

Based on our current best estimate, the proposed change is needed by June 13, 1984 in order to prevent commensurate day-for-day delays in startup of the Unit. Unit 2 is currently coming out of a refueling outage. In that we have been shutdown since March 10, 1984 the core is relatively clean (i.e., free of active particulate) and sufficiently borated to maintain subcriticality at cold conditions. Decay heat is significantly reduced, because of the long decay time period since critical operation and the fact that 92 out of 193 assemblies have been

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replaced with fresh fuel. Since the plant is at refueling boron concentration in MODES 3 and 4, the potential for going critical is minimal. Further, in the event of an accident requiring decay heat removal using emergency systems, decay heat is at levels normally associated with MODES 5 and 6 rather than higher modes. Based on the above safety considerations, we believe operation in MODES 4 and 3, after refueling and with only one fully OPERABLE battery, will not create a significant hazards consideration as defined in 10 CFR 50.92. Specifically, we believe that 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, and maintaining decay heat removal capability for normal and accident considerations in MODES 3 and 4. In addition, since the proposed change does not increase the consequences of a previously analyzed accident, the change will not adversely impact the environment.

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. In addition, commensurate with the affect that an emergency T/S change has on the notice and publication period in the Federal Register, we will notify the State of Michigan by telephone of this requested amendment to our T/S.

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,



M. P. Alexich RBK
Vice President 5/25/84

Attachment

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

