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 AUTH. NAME AUTHOR AFFILIATION
 ALEXICH, M. P. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director.

SUBJECT: Application for amend to Licenses DPR-58 & DPR-74, revising
 Tech Specs re electrical power sys & Table 4.3-1 concerning
 surveillance requirements. Fee paid.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

May 10, 1985

AEP:NRC:0895B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
Technical Specification Change Request
Electrical Power Systems

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

Dear Mr. Denton:

This letter and its attachments constitute an application for amendment to the Technical Specifications for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2. We are requesting several changes to the Electrical Power System Technical Specification (T/S) Section 3/4.8 and its Bases for both Units 1 and 2. We are also requesting changes to Surveillance Requirements listed in Table 4.3-1 for both Units 1 and 2. Attachment No. 1 to this letter contains the reasons and 10 CFR 50.92 (no significant hazard considerations) justification for the proposed Technical Specification changes for Unit Nos. 1 and 2. Attachment No. 2 contains the proposed revisions to the T/S pages for Unit Nos. 1 and 2. All proposed changes to the Technical Specification pages are indicated by vertical bars on the right hand margin of the pages.

Please note that several of the proposed T/S changes in this letter affect pages for which changes were proposed in our submittal AEP:NRC:0659C dated December 17, 1984. Some of the proposed changes to pages 3/4 8-9 and 3/4 3-14 of Unit 1 and pages 3/4 8-9 and 3/4 8-13 supercede the changes requested in AEP:NRC:0659C. The changes to pages 3/4 3-12 of Unit 1 and 3/4 3-11 of Unit 2 are all additional changes and do not affect the previous submittal.

The proposed changes should not result in (1) a significant change in the types of effluents or a significant increase in the amounts of any effluent that may be released offsite, and (2) a significant increase in individual or cumulative occupational radiation exposure.

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

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In compliance with the requirements of 10 CFR 50.91(b)(1), copies of this letter and its attachments have been transmitted to Mr. R. C. Callen of the Michigan Public Service Commission and Mr. G. Bruchmann of the Michigan Department of Public Health.

Pursuant to 10 CFR 170.12(c), we have enclosed an application fee of \$150.00 for the proposed amendments.

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
Vice President

MPA/cm

Attachments

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

It is requested that the recipient of this letter be advised that the information contained herein is confidential and should be handled accordingly. The information is being furnished to you for your information only and should not be disseminated outside your organization.

Very truly yours,
[Signature]

The enclosed report contains information which is confidential and should be handled accordingly. The information is being furnished to you for your information only and should not be disseminated outside your organization.

Very truly yours,

J. P. [Signature]
[Title]

WFO:GCR:G

WFO:GCR:G

cc: [List of recipients]
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ATTACHMENT NO. 1 TO AEP:NRC:0895B

DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2
REASONS AND 10 CFR 50.92 JUSTIFICATION FOR THE
PROPOSED TECHNICAL SPECIFICATION CHANGES

Attachment 1 to AEP:NRC:0895B

1. These changes are proposed to make the following T/S for Unit 1 and Unit 2 identical and to more precisely identify the required battery banks:

The qualifier "No. 1" was added to both Train AB and Train CD in Unit 1 T/S 3.8.2.3, page 3/4 8-8.

The qualifier "No." was added to Train N in Unit 1 T/S 3.8.2.5, page 3/4 8-13.

The qualifiers "AB" and "CD" were added to Train AB and Train CD respectively of Unit 2 T/S 3.8.2.3, page 3/4 8-8.

These changes are administrative in nature. Therefore, we believe these changes do not involve a significant hazards consideration as defined by 10 CFR 50.92.

2. The phrase "and full electrolyte level (fluid at the bottom of the maximum level indication mark)" is to be added to T/S 4.8.2.3.2.a.2, 4.8.2.3.2.b.2, 4.8.2.5.2.a.2, and 4.8.2.5.2.b.2 for both Units 1 and 2. This change supercedes those made to these T/S in our letter AEP:NRC:0659C with the exception of the change from 70°F to 77°F in Unit 2 T/S 4.8.2.3.b.2. This change is needed because the maximum level indication mark is approximately as large as the space between the level gradients themselves. This change clarifies the definition of "full electrolyte level" to be when the level of the cell is up to the bottom of the maximum level indication mark. This change is primarily administrative in nature. Therefore we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.
3. This proposed change to Unit 1 T/S 4.8.2.3.2.c.4 eliminates a surveillance pertaining to battery recharging time. This change replaces the existing surveillance with the currently approved surveillance for Unit 2 (T/S 4.8.2.3.2.c.3), which includes adequate provisions for demonstration of the operability of the battery charger. A change to this T/S is necessary because the new battery to be installed in Unit 1 will require a higher charging current than is specified in the existing surveillance. The existing surveillance is not required in the approved Unit 2 T/S, thus elimination of this surveillance is consistent with our goal to make the Unit 1 and Unit 2 T/S more similar. This change may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the safety analysis. Therefore, we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

4. The following change is proposed to replace the existing Unit 1 and 2 T/S 4.8.2.5.2.d and Unit 2 T/S 4.8.2.3.2.d. This change is also proposed to be added to Unit 1 as T/S 4.8.2.3.2.d, replacing the nearly identical T/S 4.8.3.2.c.3 (which is to be deleted). This change makes the Unit 1 T/S identical to the respective Unit 2 T/S.

d. At least once per 18 months, during shutdown (MODES 5 or 6), by verifying that the battery capacity is adequate to supply and maintain in OPERABLE status the emergency loads for the times specified in Table 4.8-1A with the battery charger disconnected. The battery terminal voltage shall be maintained ≥ 210 volts throughout the battery service test.

This change clarifies the term "shutdown" to mean MODES 5 or 6. Also the surveillance is properly identified as the battery service test. These changes are primarily administrative in nature, and therefore, we believe they do not involve a significant hazards consideration as defined by 10 CFR 50.92.

5. The following change is proposed to Unit 1 and 2 T/S 4.8.2.5.2.e and Unit 2 T/S 4.8.2.3.2.e. This change is also added to Unit 1 as T/S 4.8.2.3.2.e.

e. At least once per 60 months, during shutdown (MODES 5 or 6), by verifying that the battery capacity is at least 80% of the manufacturer's rating when subjected to a performance discharge test. This performance discharge test shall be performed in place of the battery service test.

This change eliminates the requirement to do a battery service test if a performance discharge test is performed. The performance discharge test profile envelops the battery service test profile. Completion of the performance discharge test ensures adequate capacity to meet the requirements of the battery service test. Thus, the battery service test is not needed in this case. This change may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but the results of the change are clearly within all acceptable criteria with respect to the system specified in the safety analysis. Therefore, we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

6. We propose that the asterisks be removed from lines 1 and 2 of the Table on page 3/4 8-10 for the Units 1 and Unit 2 AB Battery Loads and CD Battery Loads. This change deletes a footnote which no longer applies to certain equipment due to a change in the critical reactor instrumentation distribution design. After this design change is implemented, the equipment in question will not have AC power sources and thus the footnote designating when such power sources should be turned on or off is no longer applicable. This change may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but the results of the change are clearly within all acceptable criteria with

respect to the system or component specified in the safety analysis. Therefore, we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

7. We propose to delete the reference to tie breakers between bus trains being open from Unit 1 and 2 T/S 3.8.2.5 and 4.8.2.5.1. In addition we would like to delete the sentence "Standby circuits provide the capability to connect the Train N battery system to the AB or CD station battery trains" from both the Unit 1 and Unit 2 Bases page B 3/4 8-1. The standby circuits were disconnected because mechanical interlocks could not be provided for the manually operated switches, and therefore the reference to them should be removed from the T/S and the Bases. This change may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but the results of the change are clearly within all acceptable criteria with respect to the system specified in the safety analysis. Therefore, we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.
8. As per our commitment resulting from Generic Letter 83-28, we will be installing Undervoltage Trip Attachments and Shunt Trip Attachments in both Units 1 and 2. Consequently, we are proposing that the appropriate Surveillance Requirements be added to Table 4.3-1 Functional Units 1 and 21. The change to Unit 2 T/S also includes a footnote which states that this T/S change does not become effective until after the 1985 refueling outage. This is necessary because the Undervoltage Trip Attachments and the Shunt Trip Attachments will not be installed in Unit 2 until that time. This change constitutes an additional restriction not presently included in the T/S. Therefore, we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

ATTACHMENT NO. 2 TO AEP:NRC:0895B

DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2

PROPOSED REVISED TECHNICAL SPECIFICATIONS PAGES

