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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-68 & DPR-74,changing Tech Spec Tables 2.2-11,4.3-7,3.3-10 & 4.3-10 re vessel level instrumentation sys & core exit thermocouples.Requests that changes go into effect on listed dates.Fee paid.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
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October 11, 1985
AEP:NRC:0856J

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
REQUESTS - RVLIS AND CORE EXIT THERMOCOUPLES

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

Dear Mr. Denton:

In our letter AEP:NRC:0856P, dated September 16, 1985, we informed you that we would be submitting Technical Specification change requests concerning both the Reactor Vessel Level Instrumentation System (RVLIS) and the core exit thermocouples. This letter transmits those change requests.

Attachment 1 to this letter contains the reasons and 10 CFR 50.92 evaluation associated with these requests. Attachment 2 to this letter contains the revised Technical Specification pages.

Pursuant to discussions with your staff in this matter, we would like to request that these Technical Specifications not go into effect until the following schedule dates:

Donald C. Cook Nuclear Plant Unit No. 1

Core Exit Thermocouples - December 31, 1985.
RVLIS - Functional at end of the next Unit 2 refueling outage, operability to be determined by final review by NRC.

Donald C. Cook Nuclear Plant Unit No. 2

Core Exit Thermocouples - At end of refueling outage currently scheduled for 1987.
RVLIS - Functional at end of the next Unit 2 refueling outage, operability to be determined by final review by NRC.

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The Unit 1 core exit thermocouple schedule is based upon previous information we have given you in regard to making the implementation date of these systems consistent with the required implementation date of the Emergency Operating Procedures. The schedule for Unit 2 allows us sufficient time to demonstrate satisfactory operating experience with the Unit 1 thermocouples prior to installation of the thermocouples in Unit 2. The RVLIS schedule assumes that we will complete the installation of the RVLIS in both units at the end of the next Unit 2 refueling outage. At that time we will send you a letter confirming the completion of the installation, as stated in our letter AEP:NRC:0761D, dated April 2, 1985. The RVLIS operability then depends on the time required by your staff to review and reply to our implementation letter. We would also like to request a period of 90 days after the RVLIS is declared operable for implementation of these Technical Specifications to allow us time to rewrite our procedures and conduct suitable training to accommodate the new Technical Specifications.

Although an effort was made to accommodate guidance provided in Generic Letter 83-37, there are differences between our Technical Specifications and the Generic Letter. These differences are primarily due to T/S format and to clarify the definition of "Train" to mean "three channels within one train" in the RVLIS T/S. The differences with regard to the RVLIS were made principally at the suggestion of the Westinghouse Electric Company, the supplier of the RVLIS system. These differences, and other specific guidance supplied by Westinghouse, are included as Attachment 3 to this letter. This information, provided by Westinghouse, will also be used in the development of surveillance test acceptance criteria. By issue of the Technical Specifications contained in this letter, we also assume that you will be approving the test methodology contained in Attachment 3 to this letter unless you advise us differently.

We believe that the proposed changes to Unit 1 and Unit 2 Technical Specifications will 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, or (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 (NSDRC) at their next regularly scheduled meeting.

In compliance with the requirements of 10 CFR 50.91(b)(1), a copy 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

cm

Attachments

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

bc: J. G. Feinstein/P. E. Infanger/A. B. Auvil
S. H. Horowitz/T. O. Argenta/R. C. Carruth
J. C. Jeffrey/R. L. Shoberg/S. L. Mar
J. J. Markowsky/S. H. Steinhart/J. A. Kobyra
R. W. Jurgensen
R. F. Kroeger
M. L. Horvath - Bridgman
J. F. Stietzel - Bridgman
F. S. VanPelt, Jr.
J. B. Shinnock
D. L. Wigginton, NRC - Washington, D.C
AEP:NRC:0856J
DC-N-6500.1

ATTACHMENT 1 TO AEP:NRC:0856J

REASONS AND 10 CFR 50.92 ANALYSES FOR

CHANGES TO THE

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

TECHNICAL SPECIFICATIONS

Instrumentation for Detection of Inadequate Core Cooling (II.F.2)

The guidance given in Generic Letter 83-37 states that:

> "Subcooling margin monitors, core exit thermocouples, and a reactor coolant inventory tracking system (e.g., differential pressure measurement system designed by Westinghouse, Heated Junction Thermocouple System designed by Combustion Engineering, etc.) may be used to provide indication of the approach to, existence of, and recovery from inadequate core cooling (ICC). These instrumentation [sic] should be operable during Power Operation, Startup, and Hot Shutdown modes of operation for each reactor.
>
> Subcooling margin monitors should have already been included in the present Technical Specifications. Technical Specifications for core exit thermocouples and the reactor coolant inventory tracking system should be included with other accident monitoring instrumentation in the present Technical Specifications. Four core-exit thermocouples in each core quadrant and two channels in the reactor coolant tracking system are required to be operable when the reactor is operating in any of the above mentioned modes. Minimum of two core-exit thermocouples in each quadrant and one channel in the reactor coolant tracking system should be operable at all times when the reactor is operating in any of the above mentioned modes. Typical acceptable LCO and surveillance requirements for accident monitoring instrumentation are provided in Enclosure 3."

We are proposing changes to Tables 3.3-11 and 4.3-7 in D. C. Cook's Unit 1 Technical Specifications to reflect the guidance given by the staff in the paragraphs above. Our addendums to Table 4.3-7 to include surveillance requirements for RVLIS and core exit thermocouples are identical to those given as examples by the Staff (attached to Generic Letter 83-37). In addition, three footnotes were added to this table. Footnotes (1) and (3) were added to indicate the plant conditions under which the RVLIS and core exit thermocouples should be calibrated (Mode 3 below Permissive P-12). Westinghouse Electric Company suggested we add footnote (2), which states that if one train of RVLIS is inoperable the core exit thermocouples and the subcooling margin can be used during a channel check to verify that the remaining RVLIS train is operable. (See Attachment 3.) The difference between Table 3.3-11 and the NRC example of the same, pertaining to the number of channels available and operable, is to account for the physical arrangement of RVLIS (i.e., the configuration of analog channels providing various parameter values to be combined and to constitute the RVLIS signal).

In addition, we are proposing changes to Tables 3.3-10 and 4.3-10 of D. C. Cook's Unit 2 Technical Specifications that are identical to those proposed changes to Unit 1 Technical Specifications discussed above.

The LCO that applies for the instrumentation contained in Tables 3.3-11 and 4.3-7 differs from that given as an example by the Staff. This, however, has already been approved and is contained in the D. C. Cook Unit 1 Technical Specifications at present.

All of the above changes constitute restrictions not presently included in the Technical Specifications. Therefore, we believe these changes do not involve a significant hazards consideration as defined by 10 CFR 50.92.