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SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, changing Tech Specs to reflect 851219 discussion re radiation monitoring sys. NUREG-0737 considerations will be included. Fee paid.

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January 21, 1986
AEP:NRC:0956A

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 TO RADIOLOGICAL
MONITORING SYSTEM

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. Specifically we would like to change Radiation Monitoring System (RMS) Technical Specifications to reflect discussions held with your staff on December 19, 1985. The reasons for the proposed changes and our analyses concerning significant hazards considerations are contained in Attachment 1 to this letter. The proposed revised Technical Specification pages are contained in Attachment 2.

These Technical Specifications will be updated to include the NUREG-0737 considerations after our compliance analysis report is completed in July 1986.

We believe that the proposed changes 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), 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.

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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
R. C. Callen
G. Charnoff
G. Bruchmann
NRC Resident Inspector - Bridgman

ATTACHMENT 1 TO AEP:NRC:0956A

REASONS AND 10 CFR 50.92 ANALYSES FOR

CHANGES TO THE

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

TECHNICAL SPECIFICATIONS

The first proposed change is to Table 3.3-3. We have added instrument numbers to the Radiation Monitors on this table for clarity and a footnote indicating this specification applies only during purge. In Table 3.3-4 the trip setpoints are replaced by a reference to the appropriate values listed in Table 3.3-6. In addition, instrument numbers are given.

We are proposing revised T/S Tables 3.3-6 and 4.3-3, which are in a format intended to facilitate use during operations. The measurement ranges have been omitted for these tables. It is believed these values are best presented in the Bases section, along with the setpoint alarm trip criteria. We have separated the alarm/trip setpoints into two columns to more clearly and accurately describe the functions of the setpoints. Specific values are given for the setpoints where applicable. In both tables the noble gas effluent monitors have been included by reference to the appropriate T/S. Action Statement 19 was renumbered as Action 21 because of confusion with Action 19 for Table 3.3-3.

In development of the Radiation Monitoring Instrumentation Surveillance T/S (Table 4.3-3), Units 1 and 2, we have interpreted that:

1) The channel functional test is successfully accomplished by the injection of a simulated signal into a channel, as close to the detector as practical, to verify the channel's alarm and/or trip function only.

2) The channel calibration as defined in T/S Section 1.9 permits the "known values" generated from radioactive calibration sources to be substituted with "known values" represented by simulated signals for that subset of "known values" required for calibration and not practical to generate using the radioactive calibration sources.

In Table 3.3-6 a footnote was added to indicate which setpoints for the Radiation Monitoring System (RMS) monitors apply only during purge. A footnote was also added to several RMS monitors to indicate that a channel check for this instrumentation should include a source check as defined in T/S 1.27.

In Table 3.3-12, we have clarified item 2.a to show that one monitor is required per train for the Service Water System Effluent Line and have added instrument numbers for clarity. In Table 3.3-13 we have added instrument numbers to certain RMS monitors for clarity. Also, the triple-asterisk footnote was deleted. This footnote incorrectly indicated that the purge was automatically terminated on high containment activity. Note 1 was changed to clarify that other requirements are for non-purging only. In addition, in Table 4.3-9 we have also added instrument numbers to the monitors for clarity.

Sections 6.12.1 and 6.12.2 for Unit 1 are being changed to be consistent with the Unit 2 T/Ss and similar to the Westinghouse Standard T/Ss (NUREG-0452, Revision 4).

In Table 4.11.2 the words "charcoal filter" are being replaced with "Iodine Adsorbing/Media." A statement was added to the Bases to clarify that this iodine adsorbing/media is to be silver zeolite. This change reflects current plant practices and industry standards.

In Table 3.12.1, Item 3.c., New Buffalo was deleted from the drinking water sample locations. St. Joseph serves as the control station; therefore, the New Buffalo station is not required. In addition, the Lake Township sample location is in the same direction as the New Buffalo station, thus New Buffalo provides only redundant information.

Several changes were made to correct spelling grammar and capitalization on pages 3/4 12-3, B 3/4 3-1, B 3/4 11-1, B 3/4 11-2 and 6-21 for both units. In addition footnote 2 to Table 3.3-13 was changed to clarify the reference made to Item 3 on the table.

These changes are part of an effort to simplify and clarify existing T/Ss. The Bases portion of the T/Ss has been amplified to describe the technical bases for the instruments, their expected range, and the basis by which instrument setpoints will be determined. As such, the Bases and T/Ss are complementary documents, the T/Ss describing the minimum conditions for safety and the Bases describing the reasons why those minimum conditions are sufficient. Items which have been removed from the T/S and put into the Bases do not have any specific Action requirements associated with them, but only provide information on which the Action is based.

We believe the proposed changes are either editorial in nature or of the type that will not increase the probability or consequences of a previously analyzed accident or introduce an unreviewed safety issue. For these reasons, we believe that the T/S amendments contained herein do not involve a significant hazards consideration as defined in 10 CFR 50.92.