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FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316

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DENTON, H. R.	Office of Nuclear Reactor Regulation, Director (post 851125

SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, changing Tech Specs to provide hourly fire watch patrols instead of continuous watches when limiting condition for operation not met. "Hourly" defined as plus/minus 15 minutes. Fee paid.

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February 20, 1986

AEP:NRC:0960A

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
FIRE WATCH TECHNICAL SPECIFICATIONS CHANGE REQUEST

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 (T/Ss) for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2. Pursuant to discussions with your staff on this matter in a meeting on November 14, 1985, we would like to change the standing fire watches required by the Action Statements of T/S Section 3.7 to hourly fire watch patrols. 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.

We believe that the proposed changes will not result in (1) a significant change in the type 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.

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

A006 1/1 w/check $150.00 #345-0256

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

RBL 2/20/86

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:0960A

REASONS AND 10 CFR 50.92 ANALYSES FOR

CHANGES TO THE

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

TECHNICAL SPECIFICATIONS

The Action Statements and Bases for T/Ss 3.7.9.2, 3.7.9.3, 3.7.9.4, and 3.7.10 currently require continuous fire watches when the Limiting Condition for Operation (LCO) is not met. We request that these continuous fire watches be changed to hourly fire watch patrols. We believe that the hourly fire watch patrol will adequately ensure timely fire detection. We also request that a statement be added to the fire protection Bases that defines an hourly fire watch patrol interval to be one hour plus or minus fifteen minutes.

This change is being requested because of the large administrative burden on the plant management required to maintain personnel to serve as fire watches. The effort required to administer fire watch personnel diverts management's attention away from other duties which could have much greater safety significance. The job of a standing fire watch is a boring, tedious task. This introduces problems with concentration and alertness and creates adverse human factors considerations which negate any additional safety benefit that a standing watch might have over an hourly patrol. In conclusion, we believe that the continuous fire watches are counterproductive from a human factors standpoint and that they should be replaced by hourly fire watch patrols.

In addition we request that the Action Statement for T/S 3.7.10, Fire Rated Assemblies, be changed to the following:

"With one or more of the above required fire rated assemblies and/or sealing devices inoperable, within one hour restore the inoperable assemblies and/or sealing devices to OPERABLE status or establish an hourly fire watch on at least one side of the inoperable assemblies and/or sealing devices or verify the OPERABILITY of fire detectors per Specifications 4.3.3.7.1 and 4.3.3.7.2 (4.3.3.8.1 and 4.3.3.8.2 for Unit 2) on at least one side of the inoperable assemblies and/or sealing devices. Restore the inoperable fire rated assemblies and sealing devices to OPERABLE status within 7 days or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the inoperable fire rated assemblies and/or sealing devices and the plans and schedule for restoring the fire rated assemblies and/or sealing devices to OPERABLE status."

Also, a statement would be added to the Bases for T/S 3.7.10 which would indicate that an operable fire rated assembly/sealing device is one that is capable of performing its intended safety function.

This new Action will eliminate several of what we believe are redundant requirements. For example, if a fire door is inoperable, we believe that either establishing a fire watch or determining that detectors are operable is adequate to ensure safety.

Another statement that is added to the Bases for T/S 3.7.10 reflects our belief that a fire rated assembly and/or sealing device that is secured in the closed position is operable provided that it is capable of performing its intended safety function. For example, if a fire door is inoperable due to an inadequate closing device, securing the door in the closed position restores the door to operable status. If, however, the fire door were inoperable because it had a hole in it, it would not be operable if secured in the closed position (because it would not perform its intended safety function) and another Action would have to be taken.

Although these changes may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, we believe that the results of the change would represent an overall enhancement to the safety of the plant. For this reason it is our belief that this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

In addition, the words "greater than or equal to" were used to replace the mathematical symbols in T/S 4.7.9.3 and 4.7.9.4. Also references in the Action for T/S 3.7.9.3 were changed to more accurately reflect the intended specification. In Specification 4.7.10.1 the word "assemblies" was changed to "assembly" for grammatical reasons. These changes are editorial and thus administrative in nature. Therefore we do not believe that these changes involve a significant hazards consideration as defined by 10 CFR 50.92.