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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 HVAC charcoal filter fire suppression sys mode of operation to manual, per 860109 telcon. Fee paid.

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March 14, 1986
AEP:NRC:0960

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
HVAC CHARCOAL FILTER FIRE SUPPRESSION SYSTEM
TECHNICAL SPECIFICATION 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 teleconference held on January 9, 1986, we would like to change the HVAC Charcoal Filter Fire Suppression Systems to a manual mode of operation. This change would be reflected in the T/Ss on Table 3.7-5 (both units) by changing the tables' descriptions of system actuations to "manual and electric-heat." 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.

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Mr. Harold R. Denton


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AEP:NRC:0960

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 3/14/86

MPA/rjn

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

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ATTACHMENT 1 TO AEP:NRC:0960
REASONS AND 10 CFR 50.92 ANALYSES FOR
CHANGES TO THE
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2
TECHNICAL SPECIFICATIONS

Attachment 1 to AEP:NRC:0960

This attachment provides the background and 10 CFR 50.92 justification for the request to convert the fire protection for the T/S filter unit charcoal filters from automatic to manual control.

Heat detection and water suppression fire protection is provided for these charcoal filter units. The heat detection system uses thermistor sensors in the charcoal filter units. The system is arranged for two-point notification of the control room. The lower temperature is a pre-alarm which notifies the Control Room that a charcoal filter fire may be imminent. If heat continues to build up, a fire condition is annunciated locally and in the respective Control Room, and the suppression system's three-way control valve opens to allow water to discharge through the spray nozzles and extinguish the fire. Upstream of the three-way suppression system valve is a manually operated gate valve for system isolation which is presently maintained in the open position.

We propose to make the charcoal filter fire protection system manual by closing the system gate valve upstream of the automatically operated three-way valve. This would preclude an inadvertent system actuation or suppression water leakage that would affect the ability of the charcoal filter unit to perform its safety function under accident conditions. The pre-alarm setting of the detection system will still notify the Control Room of an imminent fire condition. Administrative controls will be implemented to have the gate valve opened upon receipt of the pre-alarm signal. In case of a fire, the three-way valve would open and allow the water to reach the spray nozzles which protect the charcoal.

The proposed change would require manual action prior to the automatic actuation of the fire protection systems associated with the charcoal filters. Nevertheless, due to the availability of continuous detection and the availability of pre-alarm signals cited above, we believe that the proposed change would not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change would continue to allow suppression of fires in the charcoal filter beds, and thus would not create the possibility of a new or different kind of accident from any accident previously evaluated. Finally, the proposed changes would involve reliance on operator action rather than automatic actuation and thus in some way involve a reduction in the margin of safety. However, since operator action on a timely basis is clearly allowed for other safety-related concerns, we do not believe in any way that such action as indicated by the proposed T/S change would involve a significant reduction in a margin of safety.

For the reasons stated above, although this change may reduce in some way a safety margin, we conclude that the results of this change would represent an overall enhancement to the safety of the plant. Specifically, while manual intervention is necessary to ensure that the fire protection system will work, the extra step in fire protection system operation is more than offset by the increase in reliability of the charcoal and its ability to perform its function in the case of a nuclear accident. For this reason it is our belief that this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

ATTACHMENT 2 TO AEP:NRC:0960

PROPOSED CHANGES TO THE

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

TECHNICAL SPECIFICATIONS

