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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 amend to Licenses DPR-58 & DPR-74, changing  
 Tech Spec 3/4.4.5, "Steam Generators" to clarify  
 requirements for steam generator tube integrity.

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# INDIANA & MICHIGAN ELECTRIC COMPANY

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November 13, 1986

AEP:NRC:0936D

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
STEAM GENERATOR TUBE INTEGRITY  
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. Specifically we are proposing a change to T/Ss 3/4.4.5, Steam Generators, to clarify that the requirements are for steam generator tube integrity. The reasons for the proposed change and our analysis 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 change 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 (NSDRG) 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.


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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. E. Alexich *RBK*  
Vice President *11/12/86*

cm

Attachments

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

ATTACHMENT 1 TO AEP:NRC:0936D  
REASONS AND 10 CFR 50.92 ANALYSIS FOR  
CHANGE TO THE  
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2  
TECHNICAL SPECIFICATIONS



In recent discussions with NRC staff, a discrepancy was brought to our attention concerning T/S requirements for steam generators, specifically T/S 3/4.4.5. The Bases section to this T/S clearly states that the purpose of the T/S and associated surveillance requirements is to maintain the structural integrity of the steam generator tubes. The current T/S, however, addresses only the operability of the steam generator. We believe the scope of the steam generator operability includes steam generator tube integrity, but we agree with the NRC staff that this should be stated explicitly.

We propose the following changes:

1. Retitle the section beginning on page 3/4 4-7 "Steam Generator Tube Integrity." The corresponding Bases section is also retitled.
2. Change the Limiting Condition for Operation 3.4.5 to "The tube integrity of each steam generator shall be maintained."
3. Change the "Action" on page 3/4 4-7 to read: "With the tube integrity of one or more steam generators not maintained, restore the tube integrity of the affected steam generator(s) prior to increasing  $T_{avg}$  above 200°F."
4. In T/Ss 4.4.5.0, 4.4.5.1 and 4.4.5.4.b, delete the word "OPERABLE" and insert the phrase "The tube integrity of."
5. In Table 4.4-1, Notation 2, page 3/4 4-12, change the words "Each of the other two" to "the third and fourth" and add the word "respectively" for clarity.

As stated above, we believe the scope of the current T/S includes steam generator tube integrity. Steam generator operability, which is deleted from this T/S, is addressed in T/S 3/4.4.1 (Reactor Coolant Loops and Coolant Circulation). These changes do not affect the requirements of T/S 3/4.4.1. Therefore we believe these changes are administrative and merely clarify the intent of T/S 3/4.4.5.

Per 10 CFR 50.92, a proposed amendment will not involve a significant hazards consideration if the proposed amendment does not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated,
- (2) create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated, or
- (3) involve a significant reduction in a margin of safety.

#### Criterion 1

The changes proposed in this letter will clarify the intent of the T/S but will not impact plant components or systems. Therefore we believe these changes will not involve a significant increase in the probability or consequences of a previously evaluated accident.

Criterion 2

These changes are purely administrative in nature. The plant systems, components and operation will not be altered by these changes. Therefore we believe this change will not create the possibility of a new or different kind of accident than has previously been analyzed or evaluated.

Criterion 3

Since these changes are administrative in nature, they will not impact the ability of plant systems and components to perform their safety function. Therefore we believe these changes will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14780) of amendments considered not likely to involve a significant hazards consideration. The first example is that of a purely administrative change to the T/Ss: for example, a change to achieve consistency throughout the T/Ss, correction of an error, or a change in nomenclature. We believe that the changes requested in this letter are of the type specified in the example. Since these changes are administrative in nature, they do not reduce a margin of safety, do not increase the probability or consequences of a previously analyzed accident, and do not introduce the possibility of a new accident. Therefore, we believe these changes do not involve a significant hazards consideration as defined by 10 CFR 50.92.

We request that the title of the Bases Section 3/4.4.5 be changed to correspond to the change in title of T/S 3/4.4.5. In addition, we would like to add the following statement to T/S Bases 3/4.4.5:

"In MODES 1, 2, 3 and 4 the tube integrity of the steam generators shall be considered maintained if the primary-to-secondary leakage rate is within the limits of Specification 3.4.6.2."

This statement clarifies the intent of the change in nomenclature and better defines the term "tube integrity."

ATTACHMENT 2 TO AEP:NRC:0936D  
REVISED PAGES FOR THE  
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2  
TECHNICAL SPECIFICATIONS