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 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, revising
 administrative section of Tech Specs re facility
 organization & plant nuclear safety review committee. Fee
 paid.

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December 1, 1986
AEP:NRC:0659J

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 SPECIFICATIONS CHANGE TO
ADMINISTRATIVE CONTROLS

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 changes to the administrative section of the Technical Specifications relating to Facility Organization and the Plant Nuclear Safety Review Committee. 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. A revised facility organization chart is included in Attachment 3.

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.


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. P. Alexich
Vice President
RHK
12/1/86

MPA/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:0659J
REASONS AND 10 CFR 50.92 ANALYSES FOR
CHANGES TO THE
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2
TECHNICAL SPECIFICATIONS

The proposed T/S changes are requested to accommodate a management reorganization at the Donald C. Cook Plant. This management reorganization retains key experienced personnel while adding new expertise. The addition of a third assistant plant manager and the redefining of the scope of the assistant plant managers' duties provide a better balance to the plant administrative functions and permit the Plant Manager to spend more time with plant overview and direction.

The first proposed change is the deletion of Figures 6.2-1 and 6.2-2 for both units. These figures are included in our FSAR as Figures 1.7-4 and 1.7-5, and will be updated to reflect current organization in our next annual FSAR update. Specifically, a number of changes will be made to FSAR Figure 1.7-5. This revised figure has been included in Attachment 3 for information purposes. Also, the references to these figures in T/Ss 6.2.1 and 6.2.2 have been changed to reflect this deletion. We are requesting this change because the updating of these figures has become an administrative burden. We believe these organization charts do not belong in T/Ss and are more appropriately controlled in the FSAR under the 10 CFR 50.71(e) process.

The second change is to T/S 6.5.1.2 and T/S 6.5.1.5, the composition and quorum of the Plant Nuclear Safety Review Committee (PNSRC). We propose that the PNSRC be restructured into a system of one chairman and six functional areas: Managerial, Operations, Technical Support, Maintenance, Instrumentation and Controls, and Radiation Protection. Each functional group has two to four members, all of whom are members of the PNSRC. Alternates will not be permitted. If the chairman (Plant Manager) cannot attend a meeting, he may designate one of the members of the managerial functional area to serve as chairman. A quorum of the PNSRC consists of the chairman and one member from at least four of the six functional areas. This system will assure that a diverse group of cognizant personnel will be present at all PNSRC meetings while allowing flexibility in membership to facilitate the scheduling of such meetings.

In addition to the above changes, we propose to change T/S Section 6.8.2, page 6-13 for both units. We are clarifying this T/S to show that the PNSRC is not required to review contractor procedures for those contractors which have an approved quality assurance program under 10 CFR 50 Appendix B. We believe this to be only a clarification of the original intent of the T/S.

A change is proposed to add the following statement to T/S 6.3.1:

"(3) personnel who perform inspections on safety-related construction and major modifications shall be qualified to ANSI N45.2.6 (1978); and (4) personnel who perform non-destructive testing examinations shall be qualified to SNT-TC-1A."

This statement clarifies the qualification requirements for personnel performing inspections on safety-related construction and modifications and non-destructive examinations. We have been using the specified requirements for the qualification of these personnel, and we believe it is appropriate to include this practice in our administrative controls T/Ss. This change is also consistent with the personnel qualifications given in Chapter 1 of the FSAR.

Also on page 6-13 we propose that the title referenced in T/S 6.7.1.d be changed from "Vice President, Nuclear Engineering" to "Vice President, Nuclear Operations." This change is consistent with the title changes we received in Amendments 87 for Unit 1 and 73 for Unit 2.

The final change is to correct several editorial errors. On page 6-1 for both units the capitalization was corrected for the words "Facility" and "ALL" to be "facility" and "All." On page 6-5 for both units two commas were added to T/S 6.3.1 to clarify this statement. Also on this page the word "Plant" was inserted to clearly identify the reference to the Plant Radiation Protection Supervisor and the word "FUNCTION" was added to Unit 2 T/Ss to make them more similar to Unit 1 T/Ss. All of these changes are purely editorial and thus administrative in nature.

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 requested in this letter affect only the Administrative Controls section of the T/Ss. We believe the revised facility organization will enhance the safe operation of the D. C. Cook Plant. 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.