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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315  
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 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Application for amend to License DPR-58, requesting addl  
 surveillance interval extensions for Cycle 9. Shutdown  
 scheduled for 870420. Description & reasons for proposed  
 changes & analysis of significant hazards encl. Fee paid.

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# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

January 9, 1987  
AEP:NRC:0967F

Donald C. Cook Nuclear Plant Unit No. 1  
Docket No. 50-315  
License No. DPR-58  
ADDITIONAL SURVEILLANCE INTERVAL EXTENSIONS FOR UNIT 1 CYCLE 9

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 1. Specifically, we request an extension for certain surveillances which the T/Ss require to be performed beginning April 20, 1987. Many of these surveillances can only be performed during shutdown; therefore, to avoid unnecessary shutdown of the plant, we ask that your review of this request be performed on an expedited basis and that you respond to us by April 15, 1987.

In addition to the changes requested in this letter, we also anticipate the need for extension of the surveillance requirements of T/Ss 4.6.5.1.b.2 and 4.6.5.1.b.3, which concern ice condenser ice basket weighing and flow passage inspection, respectively. These surveillances are required to be performed by May 10, 1987. A separate letter requesting surveillance extensions for these T/Ss will be transmitted to you shortly.

A description of the proposed changes, the reasons for the 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.

Most of the surveillance extensions are associated with items required during the refueling outage. The reason for the change is that the length of the fuel cycle has been extended for reasons which were not anticipated and were described in our letter AEP:NRC:0967D, dated October 1, 1986.

Some of the Technical Specification pages affected by this submittal are pages for which changes are pending due to prior submittals. The proposed changes contained in this submittal are in addition to our previous requests, and do not supersede them. The pages included in this category and the applicable prior submittals which have not yet been processed are provided in the table below.

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<u>Letter No.</u>	<u>Date</u>	<u>Technical Specification Page Nos.</u>
AEP:NRC:0972	January 17, 1986	3/4 7-17
AEP:NRC:0967D	October 1, 1986	3/4 5-5, 7-17, 7-28, 8-5
AEP:NRC:0931	August 23, 1986	3/4 7-28
AEP:NRC:08560	July 10, 1986	3/4 7-22
AEP:NRC:0856J	October 11, 1985	3/4 3-56
AEP:NRC:0856I	May 19, 1986	3/4 3-56

We believe that these proposed changes will not result in (1) a significant change in the types of effluents or a significant increase in the amount 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.

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,

  
H. P. Alexich  
Vice President  
BRS  
11/9/81

pm

**Attachments**

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

Attachment 1 to AEP:NRC:0967F  
Reasons and Significant Hazards  
Considerations for Changes to the  
Technical Specifications for D. C. Cook Unit 1

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As stated in our letter, the purpose of this proposed amendment is to prevent a surveillance outage before our next refueling outage currently scheduled to begin on or about May 23, 1987. This submittal requests extensions for surveillances that must be performed during shutdown or that present such operational complexity that performing the surveillance at power is not practical. A number of the changes involve requests for extensions of surveillances that are due after the scheduled beginning of the Unit 1 refueling outage. Some of these surveillances are required in Modes 5 or 6; therefore we are requesting these extensions to allow completion of the surveillances in an orderly manner so that we can avoid disturbing the complex outage schedule. This will prevent any unnecessary delay in returning to power operation. The remaining surveillances are not required in Modes 5 or 6 but are included to eliminate the need for additional extensions should the start of the outage be delayed past May 23, 1987. We propose to add the following requirement to Section 4.0:

- 4.0.6 By specific reference to this section, those surveillances which must be performed on or before July 31, 1987, and are designated as 18-month surveillances (or required as outage-related surveillances) may be delayed until the end of the Cycle 9-10 refueling outage (currently scheduled to begin during the second quarter of 1987). For these specific surveillances under this section, the specified time intervals required by Specification 4.0.2 will be determined with the new initiation date established by the surveillance date during the Unit 1 1987 refueling outage.

We reference this T/S by footnote in all surveillances that require this extension. This footnote will be applicable to the following T/Ss with the indicated surveillance due date. Dates given include the grace period allowed by T/S 4.0.2.

<u>T/S Affected</u>	<u>Description of Change</u>	<u>Due Date</u>
(1) 4.8.2.3.2.d 4.8.2.4.2	Delay AB and CD battery tests	4/20/87 5/29/87
(2) 4.5.1.d 4.5.2.e 4.6.2.1.c 4.6.2.2.c.2 4.6.3.1.2 4.7.3.1.b 4.7.4.1.b 4.7.5.1.e.2 4.7.6.1.d.3	Delay testing for equipment response to ESF signals (safety injection, containment pressure-high, containment isolation phase A and B and purge exhaust).	4/30/87 5/7/87



	<u>T/S Affected</u>	<u>Description of Change</u>	<u>Due Date</u>
(3)	4.8.1.1.1.b 4.8.1.2	Delay reserve power transfer test	5/19/87 7/14/87
(4)	4.6.5.3.1.b 4.6.5.4.b 4.6.5.4.c	Delay ice condenser lower inlet door and inlet door position monitoring system tests	5/21/87
(5)	Table 4.3-4 Item 1.a	Delay channel calibration for the strong motion triaxial accelerographs	6/5/87
(6)	Table 4.3-7 Item 13	Delay calibration of PORV block valve position indicator-limit switches	6/6/87
(7)	4.6.5.5.2.b	Delay testing of containment penetration seals	7/2/87
(8)	Table 4.3-7 Item 14	Delay calibration of the acoustic monitor	7/7/87
(9)	4.4.4.2	Delay testing pressurizer heaters from the emergency power supply	7/28/87

A description of the proposed changes, the reasons for the changes, and our analyses concerning significant hazards considerations for each group of extension requests are given in the remainder of this attachment.



## (1) AB AND CD BATTERIES

We are requesting extensions for the battery charger and battery service tests required by T/Ss 4.8.2.3.2.d and 4.8.2.4.2.

T/S 4.8.2.3.2.d requires verification every 18 months (during shutdown) that the battery capacity (with the charger disconnected) is adequate to supply and maintain its associated emergency loads. Typically, this test results in discharging the battery below the minimum operability levels called for by T/S 4.8.2.3.2. The battery service test required by T/S 4.8.2.3.2.d cannot be performed at power because the test and subsequent restoration of the battery to the T/S-required charge level cannot be completed in the 2 hours allotted by the action statement. Additionally, T/S 4.8.2.3.2.d specifically requires the testing to be performed during shutdown. T/S 4.8.2.4.2 is included in our request since it references T/S 4.8.2.3.2.

Weekly and quarterly checks of electrolyte levels, specific gravities and cell voltages are conducted per T/Ss. These periodic checks would provide early detection of any battery deterioration.

In addition, the AB and CD batteries were replaced during the last refueling outage. The new cells have lead-calcium grids, which require less maintenance than the previous cells, which had lead-antimony grids. The new batteries have been 100% capacity tested at the factory per requirements of IEEE 450-1980. Additionally, battery service tests were performed after installation. Review of these tests and other tests that are conducted weekly and quarterly did not indicate any battery deterioration.

The battery chargers that supply normal float and equalize charge to the batteries were tested in October 1985. The chargers met the acceptance criteria of the T/Ss. Therefore there is no reason to suspect that the battery and its associated chargers will not perform their intended functions.

It is our belief that the temporary relief requested from the requirements of T/Ss 4.8.2.3.2.d and 4.8.2.4.2 will not pose a significant risk to public health and safety.

## 10 CFR 50.92 Criteria

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

Criterion 1

As described above, the AB and CD batteries are new and have passed all factory and post-installation testing. This, in combination with the weekly and quarterly testing, indicates that the batteries can perform their safety function. Thus, we have no reason to suspect that the batteries would fail their next required test, even if the surveillance interval were extended. Hence, we do not believe the change would significantly increase the probability or consequences of a previous evaluated accident, nor should it significantly reduce a safety margin.

Criterion 2

Because the change will not introduce any new operating configuration or equipment from that presently allowed by T/Ss, the change should not create the possibility of a new or different kind of accident from any which has previously been evaluated.

Criterion 3

For the reasons given in Criterion 1, we believe this change does not involve a significant reduction in a margin of safety.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes which may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but the results of which are within limits established as acceptable. We believe this change falls within the scope of this example. Therefore we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

## (2) ESF RESPONSE TIME TESTING

We are requesting exemptions from surveillance requirements involving engineered safety features (ESF) response testing. We previously requested exemption for the instrumentation time response testing under T/S 4.3.2.1.3 in our letter AEP:NRC:0967D, dated October 1, 1986. In this letter we are also requesting an exemption for the response testing of equipment which actuates on an ESF signal (Safety Injection, Containment Pressure High-High, Containment Isolation Phase A and B, and Purge Exhaust).

The affected systems and their respective ESF actuation signals are as follows:

	<u>T/S</u>	<u>System</u>	<u>ESF Signal</u>
1)	4.5.1.d	accumulator isolation valves	SI
2)	4.5.2.e	ECCS automatic valves	SI
		centrifugal charging pump	SI
		safety injection pump	SI
		residual heat removal pump	SI
3)	4.6.2.1.c	containment spray automatic valves and pumps	containment pressure high-high
4)	4.6.2.2.c.2	spray additive system automatic valves	containment pressure high-high
5)	4.6.3.1.2	containment isolation valves	Phase A isolation Phase B isolation
		containment purge and exhaust valves	containment purge and exhaust isolation
6)	4.7.3.1.b	component cooling water automatic valves	SI
7)	4.7.4.1.b	essential service water automatic valves	SI
8)	4.7.5.1.e.2	control room ventilation	SI Phase A isolation
9)	4.7.6.1.d.3	ESF ventilation	Containment pressure high-high

In the above table, Items 2 through 7 are specifically required by T/Ss to be performed during shutdown. Items 1, 8, and 9 are not specifically prohibited by T/Ss from being performed at power. However, to do this testing (as well as the other testing listed in the table) would require us to remove an entire train of safety equipment from operation (with the exception of the specific equipment being tested). Because this removes a layer of protection built into the plant, and because it involves operating the plant in an abnormal configuration, it is not considered prudent to perform this testing at power.

The surveillance history of these ESF systems shows that since 1983 we have had no failures due to equipment degradation in meeting the T/S requirements. The failures that have been experienced have been with the limit switches which give indication of actuation to the control room and with improper wiring following maintenance. (The wiring problem was corrected before the system was placed in service.) These systems have not been found unable to perform their safety function while in service. Therefore we believe that this change would not result in a significant risk to the public health and safety, based on the inspection and test history of the systems.

#### 10 CFR 50.92 Criteria

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

##### Criterion 1

On the basis of the test history of these required ESF response actuations, we believe that the extension will not result in a significant increase in the probability or consequences of a previously evaluated accident.

##### Criterion 2

The surveillance extension will not result in a change in plant configuration or operation. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

##### Criterion 3

We believe that an extension of the surveillance interval will not result in a significant reduction in a margin of safety, for the reasons given in Criterion 1 above.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes which may result in some increase to the probability of occurrence or consequences of a

previously analyzed accident, but the results of which are within limits established as acceptable. We believe this change falls within the scope of this example. Therefore we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.



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### (3) RESERVE POWER TRANSFER

We are requesting exemption from performing the reserve power transfer test required by T/Ss 4.8.1.1.1.b and 4.8.1.2. This change will delay the testing of the unit's ability to both automatically transfer from the normal auxiliary source to the preferred reserve source and to manually transfer to the alternate reserve source. The automatic transfer function cannot be tested without a reactor trip and thus cannot be performed at power. The automatic transfer has been demonstrated functional three times during 1986, as a result of unit trips from power, the first at the end of May, the second during the third week in July and the third at the end of November. The alternate reserve manual transfer has not been actuated since the last surveillance test. To perform the manual transfer to the alternate reserve source would require the de-energizing of the emergency busses, one at a time, the locking out of the associated diesel generator to prevent the auto-start of the diesel from the blacked-out bus, and the closing of the cross-tie breaker on the 600V loads which removes some of the electrical system redundancy. The alternate reserve source is out of phase with the normal power supplies, and no method is provided to parallel the emergency busses to the alternate reserve source; therefore, the emergency bus must be blacked out prior to energizing it from the alternate reserve source. Due to the loss of redundancy of the electrical sources and the necessity to remove entire trains of safety equipment from service, this testing is not considered feasible at power.

The operation and required testing of these systems have shown them to be highly reliable. The systems have passed all five 18-month surveillance tests since 1980. We note that the length of the extension requested is short compared to the overall surveillance frequency. Therefore, we believe that this change would not result in a significant risk to the public health and safety, based on the operation and test history of the system.

### 10 CFR 50.92 Criteria

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

#### Criterion 1

On the basis of the operation and test history of the reserve power transfer system, we believe that the extension will not result in a significant increase in the probability or consequences of a previously evaluated accident.

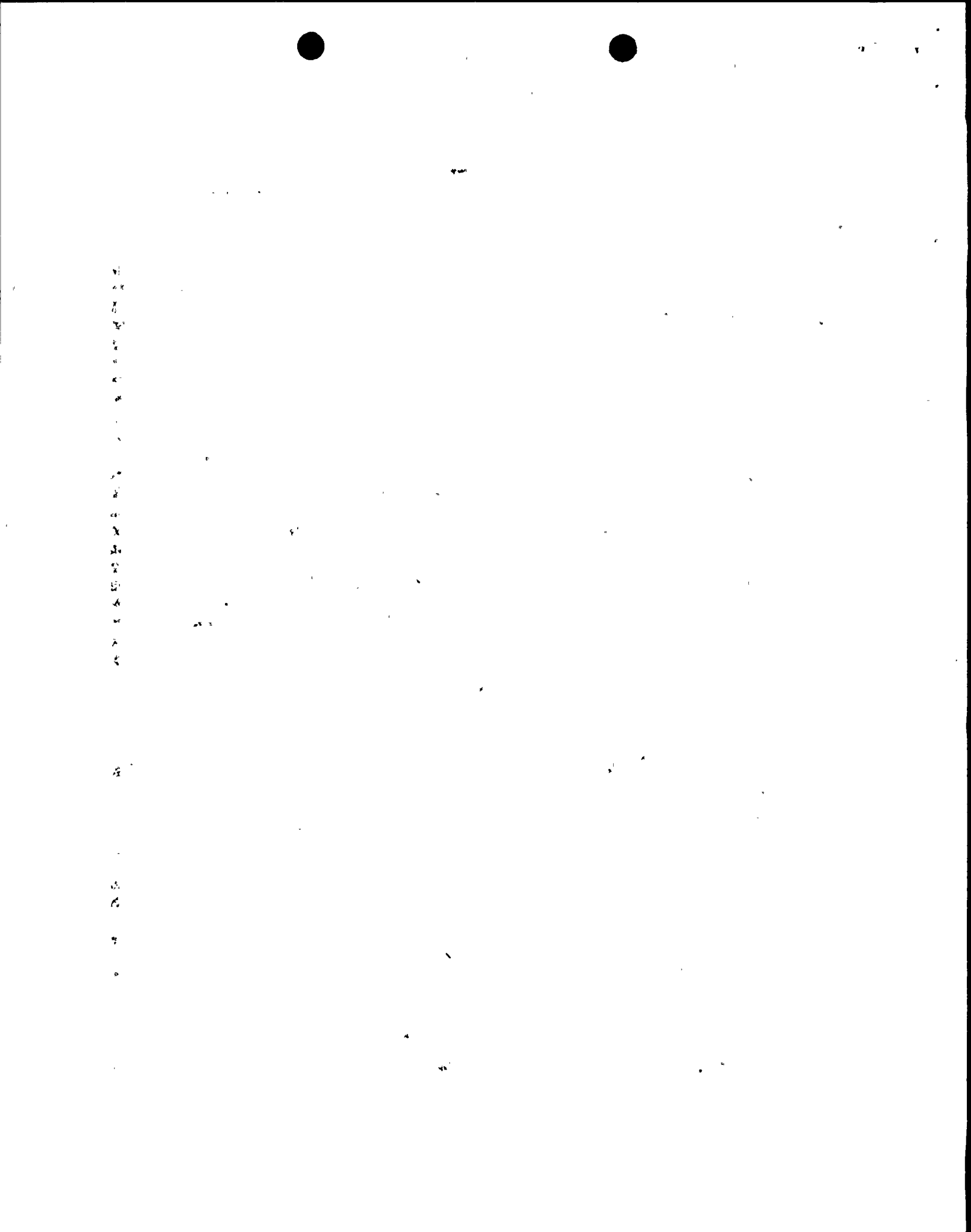
Criterion 2

The surveillance extension will not result in a change in plant configuration or operation. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

Criterion 3

We believe that an extension of the surveillance interval will not result in a significant reduction in a margin of safety, for the reasons given in Criterion 1 above.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes which may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but the results of which are within limits established as acceptable. We believe this change falls within the scope of this example. Therefore we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.



#### (4) ICE CONDENSER LOWER INLET DOORS

We are requesting an exemption for testing of the ice condenser lower inlet doors and inlet door position monitoring system required by T/Ss 4.6.5.3.1.b, 4.6.5.4.b. and 4.6.5.4.c. This testing cannot be performed at power due to ALARA considerations.

No failures of the lower inlet doors were found in surveillances performed in April or September 1985. In a surveillance done in December 1985, seven doors failed due to ice accumulation. After the ice was removed, all of the doors passed the retest and showed no signs of mechanical failure. Another surveillance was performed in June 1986, with all doors successfully passing. The failures found during the December 1985 surveillance are believed to have occurred as a result of outage work performed during the Unit 1 1985 refueling outage. Some of this work involved deliberate defrosting of the ice condenser, and was done after the September 1985 inlet door surveillances were performed. It is believed that water and ice from the defrost operation accumulated on the doors, causing the opening torques to exceed T/S limits. To prevent recurrence, the ice condenser defrost procedure now requires that the door opening torques be tested following a defrost operation. Additionally, operations personnel make a thorough visual inspection of the containment prior to start-up after an extended outage. These inspections now include the lower inlet doors and would be expected to disclose excessive frost buildup on the doors, should it be present. It is therefore our belief that the failures discovered in December 1985 were an isolated incident, and that adequate corrective action has been taken to prevent recurrence. Based upon the above information regarding recent ice condenser door history, and because the extension is needed for only a short time period, we do not believe that an extension will significantly impact public health and safety.

#### 10 CFR 50.92 Criteria

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

#### Criterion 1

On the basis of the test history of the ice condenser lower inlet doors, we believe that the extension will not result in a significant increase in the probability or consequences of a previously evaluated accident.

Criterion 2

The surveillance extension will not result in a change in plant configuration or operation. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

Criterion 3

We believe that an extension of the surveillance interval will not result in a significant reduction in a margin of safety, for the reasons given in Criterion 1 above.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes which may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but the results of which are within limits established as acceptable. We believe this change falls within the scope of this example. Therefore we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

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## (5) SEISMIC MONITORING INSTRUMENTATION

This change will allow a delay of the channel calibration which is required by T/S 3.3.3.3, Table 4.3-4, Item 1.a for the Strong Motion Triaxial Accelerographs (SMTAs). These instruments are located inside lower containment and are thus inaccessible during power operation because of high radiation levels.

These instruments are required to be operable to ensure that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. If an instrument becomes inoperable, T/Ss require that a special report be submitted pursuant to the requirements of our T/S 6.9.2 within the next 10 days, which outlines the cause of the malfunction and the plans for restoring the instrument to operable status. Since we have advance notice that the instruments will become technically inoperable per our present T/Ss, we are submitting our request for a surveillance interval extension in lieu of a special report after the fact. In addition, we note that the length of the extension requested is short compared to the overall surveillance frequency.

It is our belief that the change will not pose a significant risk to public health and safety. The SMTAs do not provide any automatic trip functions and are not necessary for safe shutdown of the plant. In addition, only two of eight instruments which measure seismic response and are required to be operable per T/Ss are affected. Any of these other instruments would be expected to detect seismic activity and give indication of its magnitude. The area in which the Cook Plant is located has not had any indication of significant seismic activity at any time during the plant's operational history. The SMTAs have not had a history of problems with significant calibration drift.

## 10 CFR 50.92 Criteria

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

Criterion 1

As described above, the SMTAs are not required for safe shutdown of the plant, nor do they provide any automatic trip functions. Additionally, there are other instruments available which would give indication that seismic





activity has occurred. Therefore, we believe that this change will not involve a significant increase to the probability or consequences of a previously analyzed accident.

#### Criterion 2

The phenomenon of concern for the SMTAs is seismic activity. This is purely a natural phenomenon, and therefore its cause is unrelated to changes in the surveillance frequency for monitoring instrumentation. A change in this frequency could not create a new or different kind of accident than has previously been analyzed or evaluated.

#### Criterion 3

An extension of time for surveillance requirements on the SMTAs will not result in a decrease in a margin of safety for the reasons specified in Criterion 1.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes which may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but the results of which are within the limits established as acceptable. We believe this change falls within the scope of this example. Therefore we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

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## (6) PORV BLOCK VALVE CALIBRATION

We are requesting an extension for the channel calibration of the PORV block valve position indicators (limit switches NMO-151, -152 and -153) required by T/S Table 4.3-7, Item 13.

Calibration of the PORV block valve limit switches cannot be performed at power because the limit switches are located inside the pressurizer doghouse, which is inaccessible during power operation because of ALARA considerations. During the extension period the monthly channel checks of the limit switches required by T/S Table 4.3-7 will continue to be performed.

An extension of the surveillance interval for calibrating the PORV block valve limit switches should not pose significant risk to public health and safety. The PORV block valve limit switches use mechanical stops which indicate whether the valves are open or closed. The nature of these devices is such that they generally are not subject to drift in mechanical adjustment. Previous calibration tests performed on the switches have not indicated any problems with failure of the switches. Monthly channel checks are performed which indicate whether the limit switches are providing indication in the control room. If the PORVs were to open even slightly and the block valves were not closed, indication would be provided to the operators by changing temperatures in the PORV discharge lines. Additional indication could also be provided by pressurizer relief tank (PRT) pressure, temperature and level instrumentation. We note that the length of the extension requested is short compared to the overall surveillance frequency.

We believe that this change would not result in a significant risk to the public health and safety, based on the reliability demonstrated by the overall surveillance program.

## 10 CFR 50.92 Criteria

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

Criterion 1

Backup instrumentation (i.e., PORV discharge line temperature, PRT pressure, temperature and level) exists which provides indication of PORV and block valve status. Additionally, the PORV block valve limit switches have not been subject to failure. Thus, we do not anticipate that the extension we

have requested will involve a significant increase in the probability or consequences of an accident previously evaluated, nor will they involve a significant reduction in a margin of safety.

#### Criterion 2

The surveillance extension will not result in a change in plant configuration or operation. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

#### Criterion 3

We believe that an extension of the surveillance interval will not result in a significant reduction in a margin of safety, for the reasons given in Criterion 1 above.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes which may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but the results of which are within limits established as acceptable. We believe this change falls within the scope of this example. Therefore we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

## (7) CONTAINMENT PENETRATION SEALS

We are requesting an extension for the performance of the inspection of the containment divider barrier personnel access doors and equipment hatches required by T/S 4.6.5.5.2.b. The seals on the doors and hatches that separate the upper and lower containment cannot be inspected at power due to ALARA concerns. In addition, T/S 3.6.5.5 requires that these doors and hatches be closed in Modes 1, 2, 3 and 4.

The 10-year surveillance has not been performed since the start-up of Unit 1 (1975). However, T/S 4.6.5.5.2.a requires that the equipment hatches and personnel access doors be visually inspected for detrimental misalignments, cracks or defects in the sealing surfaces or apparent deterioration of the seal material prior to final closure of the penetration each time it has been opened.

A review of maintenance history (1980 - 1986) for surveillance requirement 4.6.5.5.2.a did not indicate any abnormal conditions with the penetrations that were inspected (all penetrations that have been entered since plant start-up). Based on this review we have no reason to suspect that the penetrations which have not been inspected would have deteriorated significantly. In addition, we note that the length of the extension requested is short compared to the overall surveillance frequency.

We believe that this change would not result in a significant risk to the public health and safety, based on the maintenance history of the containment penetration seals.

## 10 CFR 50.92 Criteria

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

Criterion 1

On the basis of the surveillance history of the containment penetration seals, we believe that the extension will not result in a significant increase in the probability or consequences of a previously evaluated accident.

Criterion 2

The surveillance extension will not result in a change in plant configuration or operation. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

Criterion 3

We believe that an extension of the surveillance interval will not result in a significant reduction in a margin of safety, for the reasons given in Criterion 1 above.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes which may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but the results of which are within limits established as acceptable. We believe this change falls within the scope of this example. Therefore we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

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## (8) ACOUSTIC MONITOR

We are requesting exemption from the channel calibration of the safety valve position indicator--acoustic monitor required by Table 4.3-7, Item 14. This surveillance cannot be performed at power because portions of the monitoring system are located in the pressurizer doghouse, which is inaccessible due to ALARA concerns. This monitor has passed all its monthly channel checks since its last calibration. During the extension period the normal monthly channel checks will be performed. This instrumentation does not perform any trip or safety functions, and its purpose is to provide diverse information about safety valve position following an accident. If the safety valves were to open even slightly, indication would be provided to the operators by changing temperatures in the safety valve discharge line. Additional indication could also be provided by pressurizer relief tank (PRT) pressure, temperature, and level instrumentation. In addition, we note that the length of the extension requested is short compared to the overall surveillance frequency.

## 10 CFR 50.92 Criteria

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

Criterion 1

Backup instrumentation (i.e., safety valve discharge line temperature, PRT pressure, temperature, and level) exists which provides indication of valve status. Additionally, the safety valve acoustic monitor undergoes monthly channel checks and has successfully passed all its channel checks since its last required calibration. Thus, we do not anticipate that the extension we have requested will involve a significant increase in the probability or consequences of an accident previously analyzed, nor will it involve a significant reduction in a margin of safety.

Criterion 2

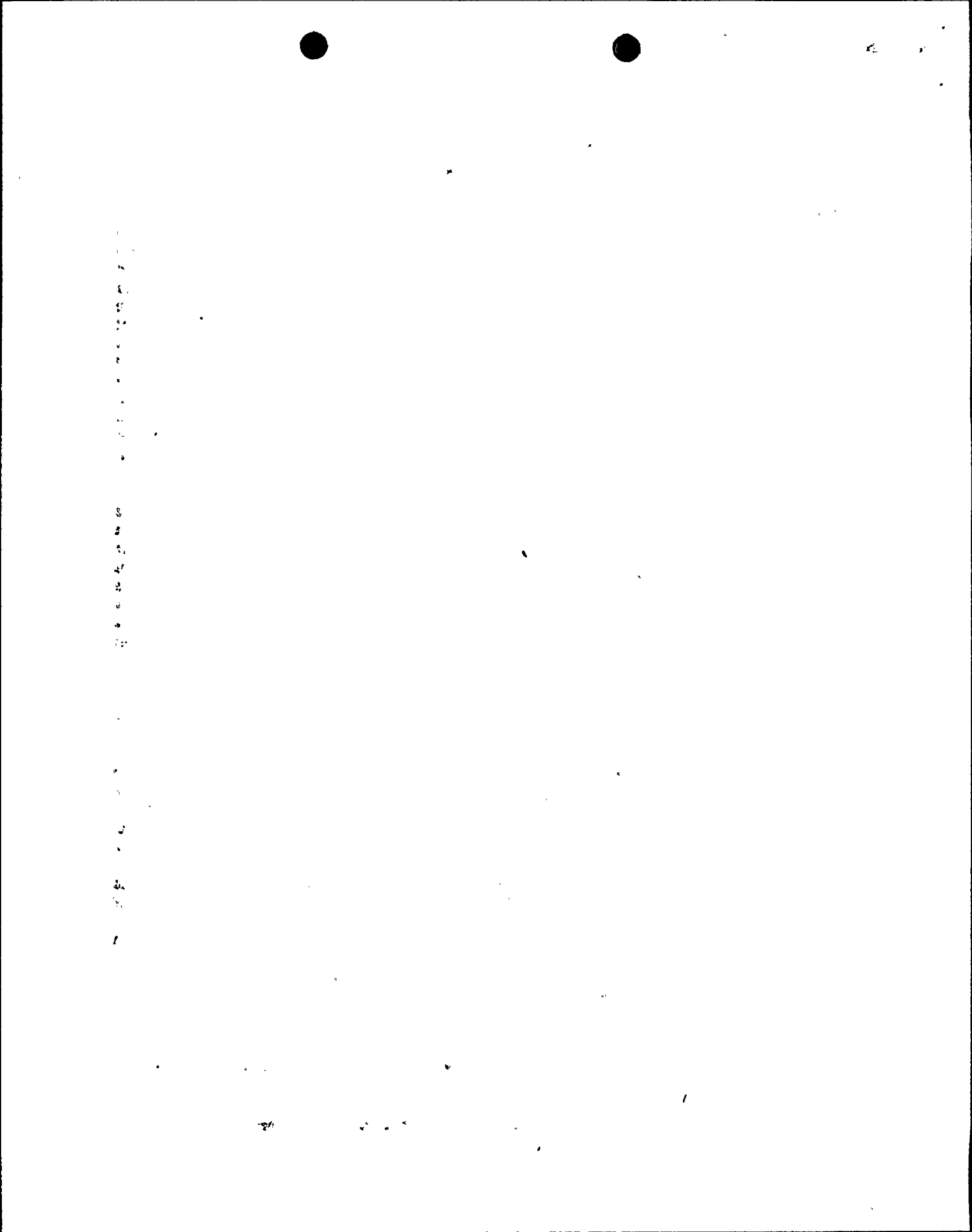
The surveillance extension will not result in a change in plant configuration or operation. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.



Criterion 3

We believe that an extension of the surveillance interval will not result in a significant reduction in a margin of safety, for the reasons given in Criterion 1 above.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes which may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but the results of which are within limits established as acceptable. We believe this change falls within the scope of this example, for the reasons previously cited. Therefore we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.



## (9) PRESSURIZER HEATERS

We are requesting an extension for testing of the pressurizer heaters required by T/S 4.4.4.2. This change will delay the demonstration of the capability to power the pressurizer heaters from the emergency diesel generators (EDG). The normal feed for the heaters we test per T/S 4.4.4.2 comes from the emergency bus, which is normally energized from the RCP supply bus. The ability of the EDG to feed the emergency busses is demonstrated monthly by paralleling the EDG to the emergency bus and loading the EDG to approximately 1000 kw. Therefore, the heaters are normally operated using the same equipment as when being powered from the EDG, and the ability of the EDG to pick up the emergency bus is demonstrated monthly; thus, it is believed that a high probability exists that the pressurizer heaters can be energized from their associated EDG. Testing per T/S 4.4.4.2 at power would require removing an entire train of safety-related equipment from its normal power supply and powering the train strictly from the EDG. Since this removes a layer of electrical defense-in-depth, and since it involves operating the plant in an abnormal mode, we do not believe it is prudent to do this testing at power.

Since the individual components of this system are tested independently of T/S 4.4.4.2, we have confidence that the entire system is functioning adequately. This system has passed both 18-month surveillance tests since 1983. This surveillance extension is from July 28, 1987 to the end of the Unit 1 outage. This extension is short compared to the surveillance interval of the testing of this system. Additionally, our review of past test data gives us no reason to believe the equipment would not be operable. Therefore, we believe that this extension would not significantly impact the ability of this system to perform its safety function.

## 10 CFR 50.92 Criteria

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

Criterion 1

On the basis of the test history of the emergency power supply for the pressurizer heaters and the relatively short length of the extension, we believe that the extension will not result in a significant increase in the probability or consequences of a previously evaluated accident.

Criterion 2

The surveillance extension will not result in a change in plant configuration or operation. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

Criterion 3

We believe that an extension of the surveillance interval will not result in a significant reduction in the margin of safety, for the reasons given in Criterion 1 above.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes which may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but the results of which are within limits established as acceptable. We believe this change falls within the scope of this example. Therefore we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

Attachment 2 to AEP:NRC:0967F  
Proposed Revised Technical Specifications