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 AUTH. NAME , AUTHOR AFFILIATION  
 ALEXICH, M. P. Indiana & Michigan Electric Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to Licenses DPR-58 & DPR-74, allowing  
 ice condenser lower inlet doors to be tested in Modes 3-6 &  
 allowing avoidance of unnecessary thermal cycling of plant.  
 Fee paid.

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# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

February 25, 1987

AEP:NRC:0900C

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
ICE CONDENSER LOWER INLET DOORS  
TECHNICAL SPECIFICATION CHANGE REQUEST

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Dear Sirs:

This letter and its attachments constitute an application for amendment to the T/Ss for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2. Specifically, we are proposing a change to T/S 4.6.5.3.1.b. The proposed change would allow the ice condenser lower inlet doors to be tested in Modes 3 or 4 as well as Modes 5 or 6. This change will allow us to avoid unnecessary thermal cycling of the plant. In addition, it could reduce our surveillance outage by approximately 2 to 5 days. This particular surveillance is not required for Unit 2 until May 17, 1987. However, we would like to be able to do this surveillance in Mode 3 in the upcoming outage for Unit 2, which is scheduled to begin on April 19, 1987. Therefore, in order to plan for this outage, we request that you inform us of the results of your review on an expedited basis. 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.

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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

RBK  
2/25/87

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:0900C  
REASONS AND 10 CFR 50.92 ANALYSIS FOR  
CHANGE TO THE  
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2  
TECHNICAL SPECIFICATIONS .

The purpose of this change is to permit the ice condenser lower inlet door (ICLID) surveillance to be performed in Modes 3 or 4 as well as Modes 5 or 6. Currently we are required to enter at least Mode 5 when performing this surveillance. This change will allow us to avoid unnecessary thermal cycling of the plant. Since cyclic stresses on steam generator tubing during start-ups and shutdowns are believed to be a contributing factor to the intergranular stress corrosion experienced to date on Unit 2, a reduction in thermal cycling may help to ensure continued tube integrity in both units. Having the option to perform this surveillance in Modes 3 or 4 will also allow operational flexibility that can shorten our ice condenser surveillance outages. We would like to test the ICLIDs in Mode 3 when we perform the next ice condenser ice basket weighings. If we can perform this surveillance in Mode 3 we can save approximately 2 to 5 days of outage time.

We propose to delete the phrase "(Modes 5 and 6)" from T/S 4.6.5.3.1.b for both units (page 3/4 6-30 Unit 1 and page 3/4 6-39 Unit 2). The words "(Modes 5 and 6)" were added to the T/S in Amendment 83 for Unit 1 and Amendment 64 for Unit 2. These words were added to qualify the term "shutdown" and to make the T/S consistent with the ICLID procedure which administratively required the surveillance to be done in Modes 5 or 6.

In order to perform the ICLID Surveillance in Modes 3 or 4, we must enter the Action statement for T/S 3.6.5.3. The Action statement allows us 14 days of continued operation provided the ice bed temperature is monitored at least once every four hours and the ice bed temperature is maintained below 27°F. If we fail to meet this requirement, the Action allows 48 hours before we are required to begin shutdown procedures. The ICLID testing generally takes less than 16 hours. Therefore, we believe that this surveillance can easily be performed within the Action constraints.

The T/S requirement to perform the ICLID procedure only in Modes 5 and 6 was added as an administrative clarification. In addition, Revision 4 to the Westinghouse Standardized Technical Specifications (NUREG-0452) does not include a restriction which would limit the performance of the inlet door surveillances to Modes 5 and 6. Therefore, we believe that the revision to this requirement is an administrative change, consistent with the provisions of the Standard T/Ss.

We have evaluated the differences in performing this surveillance in Modes 3 or 4 rather than in Modes 5 or 6 from an ALARA standpoint. Current plant procedures ensure that radiation levels in containment are acceptable before personnel are permitted to enter the containment building to perform surveillances. Therefore we believe this change will not result in a significant increase in individual or cumulative occupational radiation exposure.

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

This change revises an administrative clarification which we proposed and which was granted in Amendments 83 for Unit 1 and 64 for Unit 2. The revision of this clarification is also an administrative change. Therefore, we believe this change will not involve a significant increase in the probability or consequences of a previously evaluated accident.

#### Criterion 2

This change is purely administrative in nature. The plant system, components and operation will not be altered by this change. 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 this change is administrative in nature, it will not impact the ability of plant systems and components to perform their safety function. Therefore we believe this change 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 change requested in this letter is of the type specified in the example. Since this change is administrative in nature, it does not reduce a margin of safety, does not increase the probability or consequences of a previously analyzed accident, and does not introduce the possibility of a new accident. Therefore, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.



ATTACHMENT 2 TO AEP:NRC:0900C

REVISED PAGES FOR THE

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

. TECHNICAL SPECIFICATIONS