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

SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, modifying
 Tech Spec 3/4.8.1 re diesel generator surveillance
 requirements, per Generic Ltr 84-15.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

June 25, 1987
AEP:NRC:0896F

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 SPECIFICATION CHANGE REQUEST FOR
DIESEL GENERATOR SURVEILLANCES

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

Attn: T. E. Murley

Dear Dr. Murley:

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 propose to modify the surveillance requirements for T/S 3/4.8.1. In our letter AEP:NRC:0896B (dated January 16, 1987), we submitted proposed changes to our diesel generator T/Ss which were intended to maintain and improve diesel generator reliability as recommended by your staff in Generic Letter 84-15. During a subsequent telephone conversation, your staff requested that we submit additional changes to our diesel generator surveillance requirements. We are therefore submitting this letter to supplement our earlier diesel generator T/S submittal (AEP:NRC:0896B). A description of the proposed change, the reasons for the change, 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 request that the enclosed pages 3/4 8-3, 3/4 8-4, and 3/4 8-5 for each unit be substituted for the corresponding pages in our letter AEP:NRC:0896B.

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 (NSDRG) at their next regularly scheduled meeting.

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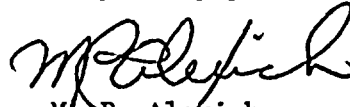
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In compliance with the requirements of 10 CFR 50.91(b)(1), copies of this letter and its attachments have been transmitted to Mr. R. C. Callen of the Michigan Public Service Commission and Mr. G. Bruchmann of the Michigan Department of Public Health.

This submittal supplements our previous diesel generator T/S submittal; therefore, we have not enclosed an application fee.

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

cm

Attachments

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

ATTACHMENT 1 TO AEP:NRG:0896F
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 proposed amendment is to supplement our earlier diesel generator T/S submittal (AEP:NRC:0896B) as agreed to in discussions with members of the NRC staff in a telephone conversation on April 24, 1987. Specifically, we propose to change the surveillance requirements of T/S section 4.8.1.1.2. A summary of the change is as follows:

1. A. Accumulated Water Removal

We have included a requirement that accumulated water be removed from the day tank after each operation of the diesel of greater than or equal to 1 hour. We have also deleted the phrase "to below the fuel tank suction level" to indicate that the accumulated water will be removed from the entire tank and not just the portion above the fuel tank suction level.

B. New Oil Sampling

We have included a requirement that the sample taken prior to adding the new oil to the storage tanks have an API gravity of greater than or equal to 30 degrees but less than or equal to 40 degrees at 60°F when tested in accordance with ASTM D1298-80. We have also included a requirement that properties not included in 4.8.1.1.2.c.1 or 4.8.1.1.2.c.2 but specified in Table 1 of ASTM D975-81 be verified within appropriate limits within 31 days of obtaining the new oil sample. In addition, we have added a corresponding section to the Bases.

We believe that the water and sediment content and the kinematic viscosity are the fuel oil properties having the most significant impact on diesel generator operability. The other properties, although they may affect the diesel generator over the long term by increasing maintenance requirements, have little influence on the ability of the generators to operate properly during the short term. Therefore, if these other properties are found to be outside the limits specified, we will expeditiously attempt to bring them back to within specified limits; however, we will not consider the affected diesel generators inoperable as a result of our out-of-spec findings. The sample specified in 4.8.1.1.2.c.3 is sent offsite for testing. We will do our best to meet the 31-day limit on the offsite tests; however, if for some reason this limit is not met (e.g., if the sample is lost or broken or if the results are not received in 31 days), we will not consider the diesel generators inoperable. If the sample is lost or broken and the new oil has already been put into the storage tank, the offsite tests will be performed on a sample taken from the storage tank.

C. Storage Tank Sampling

We have included a requirement that a sample be taken from the storage tanks at least once per 31 days and tested in accordance with ASTM D975-81 using the criteria specified in Surveillance Requirements 4.8.1.1.2.c.1 and 4.8.1.1.2.c.2. If the water and sediment content is greater than 0.05 percent volume, we have

included a requirement that the bottom of the tank be pumped out and retested until water and sediment content is less than 0.05 percent volume.

Analysis of Significant Hazards

Per 10 CFR 50.92, a proposed amendment will involve no significant hazards considerations if the 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

The surveillance requirements imposed by the requested change are more stringent than the requirements either in our current T/Ss or in the proposed T/Ss of our earlier diesel generator T/S submittal (AEP:NRC:0896B). Therefore, we believe that this change will not involve a significant increase in the probability or consequences of an accident previously analyzed.

Criterion 2

The requested change 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 the requested change 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 a significant hazards consideration. The second of these examples refers to a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications. Since the surveillance requirements imposed by the requested change are more stringent than the requirements either in our current T/Ss or in the proposed T/Ss of our earlier diesel generator T/S submittal, we believe that the proposed 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. Editorial Changes

- A. The word "fuel" has been removed from the phrase "day fuel tank" in 4.8.1.1.2.a.1 and 4.8.1.1.2.a.3. This change is being requested in order to make the T/Ss more consistent with the terminology used at the D. C. Cook Nuclear Plant.
- B. Due to incorporation of the proposed change, we were required to move some sections to the following pages (3/4 8-4 and 3/4 8-5) and change the location of some sections on these pages.

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 a significant hazards consideration. The first of these examples refers to a purely administrative change. We believe this is a purely administrative change requested in order to make the T/Ss more consistent with terminology used at the D. C. Cook Nuclear Plant. Therefore, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.