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 RECIP. NAME RECIPIENT AFFILIATION
 MURLEY, T.E. NRC - No Detailed Affiliation Given

SUBJECT: Revised application for amend to Licenses DPR-58 & DPR-74 re
 diesel generator fuel oil tank cleaning.

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AEP:NRC:0896M

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
REVISED TECHNICAL SPECIFICATIONS FOR DIESEL GENERATOR
FUEL OIL TANK CLEANING

Attn: T. E. Murley

March 23, 1989

Dear Dr. Murley:

This letter revises our application for amendment to the Technical Specifications (T/Ss) for the Donald C. Cook Nuclear Plant submitted in AEP:NRC:0896H dated November 25, 1987, and updates information contained in AEP:NRC:0896I dated January 24, 1989. A detailed description of the proposed revision and an updated analysis concerning significant hazards considerations are included in Attachment 1 to this letter. Attachment 2 contains the proposed revised T/S pages.

We believe 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 and will be reviewed by the Nuclear Safety and Design Review Committee.

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 document has been prepared following Corporate procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,

M. P. Alexich
Vice President

ldp
Attachments

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Dr. T. E. Murley

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AEP:NRC:0896M

cc: D. H. Williams, Jr.
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
A. B. Davis
NRC Resident Inspector - Bridgman
G. Bruchmann

ATTACHMENT 1 TO AEP:NRC:0896M
REASONS AND 10 CFR 50.92 ANALYSIS FOR
CHANGE TO THE
DONALD C. COOK NUCLEAR PLANT UNITS 1 AND 2
TECHNICAL SPECIFICATIONS

Background

In AEP:NRC:0896H dated November 25, 1987, we submitted a proposed Technical Specification (T/S) change which required that the diesel generator fuel oil tanks be cleaned at least once every ten years.

In AEP:NRC:0896I dated January 24, 1989, we provided a detailed description of each of the two cleaning methods allowed by the proposed T/Ss and the acceptance criteria associated with each method. The first option requires that the tanks be emptied and the interior mechanically cleaned; the acceptance criteria is a clean, dry interior as determined by visual examination. The second option requires that the oil be agitated by bubbling nitrogen gas into the tank while a minimum of five tank volumes of oil is circulated through a five-micron filter. Three successive samples of fuel are then collected and analyzed according to ASTM D2276-83. This process, including the three successive samples constitutes one iteration cycle. Our original proposal was to repeat the cycle until all three samples indicated a contaminant level less than ten mg per liter. The recirculation and sampling is repeated until all three samples indicate a contaminant level less than ten mg per liter.

Description of Revision

During discussion with members of the NRC staff, we were informed that they were unwilling to approve our tank cleaning requirements in their current form but would be receptive to a slightly modified proposal. Specifically, the NRC staff requested that we modify our proposed T/Ss to require conducting the tank cleaning using the drain-and-clean method if unacceptable results are obtained on three successive iterations using the agitation-filtration method. We have modified the proposed T/S pages accordingly and included them in Attachment 2.

Also, as requested by the NRC staff, we have modified the third paragraph on Bases page B 3/4 8-2 to clarify that it applies only to the samples taken to meet surveillance requirement 4.8.1.1.2.d, not to the samples taken during tank cleaning to meet surveillance requirement 4.8.1.1.2.f.1.

Analysis of Significant Hazards

The proposed T/S changes submitted in this letter are more restrictive than the proposed changes submitted in AEP:NRC:0896H. The significant hazards analysis submitted in AEP:NRC:0896H remains applicable to the changes submitted in this letter. These proposed changes will therefore not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different accident from any accident previously evaluated, or significantly decrease a margin of safety and consequently do not constitute an unreviewed safety question as defined in 10 CFR 50.92.