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 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316  
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 RECIP. NAME: MURLEY, T.E. RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, to clarify response time testing requirements for PRNFRT.

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AEP:NRG:1078

Donald C. Cook Nuclear Plant Units 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
CLARIFICATION OF RESPONSE TIME TESTING REQUIREMENTS  
FOR POWER RANGE NEUTRON FLUX REACTOR TRIP

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

Attn: T. E. Murley

March 29, 1989

Dear Dr. Murley:

This letter constitutes an application for amendment to the Technical Specifications (T/Ss) for the Donald C. Cook Nuclear Plant Units 1 and 2. Specifically we are proposing to clarify the response time testing requirements for the power range neutron flux reactor trip. A detailed description of the change, our reasons for requesting the change, and our analyses concerning significant hazards are contained in Attachment 1. Attachment 2 includes the proposed revised T/S pages.

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 and will be reviewed by the Nuclear Safety and Design Review Committee 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. George Bruchmann of the Michigan Department of Public Health.

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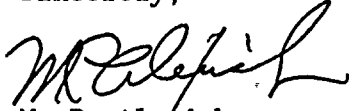
Dr. T. E. Murley

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AEP:NRC:1078

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

Sincerely,

A handwritten signature in dark ink, appearing to read 'M. P. Alexich', written in a cursive style.

M. P. Alexich  
Vice President

ldp

Attachments

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:1078

REASONS AND 10 CFR 50.92 ANALYSES FOR CHANGES  
TO THE DONALD C. COOK NUCLEAR PLANT  
UNITS 1 AND 2 TECHNICAL SPECIFICATIONS

Description of Change

This letter proposes to clarify the requirements of Table 3.3-2, "Reactor Trip System Instrumentation Response Times," by indicating that the requirements of Functional Unit 2 apply to both the high and low power range neutron flux (PRNF) reactor trip setpoints.

Background and Reasons for Change

During a review of our reactor trip system instrumentation time response testing procedures, it was observed that the time response test procedure for the nuclear instrumentation system PRNF reactor trip only included the high setpoint trip. Since credit was taken for the low setpoint trip in the safety analysis for both Units 1 and 2, the low setpoint should have been time response tested. It is believed that the lack of specific detail in the T/Ss regarding the separate setpoints was a contributing factor to the lack of testing, and we are therefore submitting the proposed changes of this letter to ensure that sufficient detail is included in the T/Ss for the PRNF reactor trip.

Justification for Change

These changes are considered to be administrative in nature and intended to clarify the response time testing requirements for the PRNF reactor trip. No operability or surveillance requirements will be reduced as a result of this change.

Analysis of Significant Hazards

Per 10 CFR 50.92, a proposed amendment will not involve significant hazards consideration if the proposed amendment does not:

- (1) involve a significant increase in the probability or consequences of a previously evaluated accident,
- (2) create the possibility of a new or different kind of accident from any previously evaluated, or
- (3) involve a significant reduction in a margin of safety.

Criterion 1

This change is intended to clarify the existing T/S requirements for the PRNF reactor trip. No operability or surveillance requirements have been reduced. We therefore believe the change does not involve a significant increase in the probability or consequences of an accident previously analyzed or a significant reduction in a margin of safety.

Criterion 2

The change does not involve physical modifications to the plant or changes in plant operation. The change therefore should not create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

See 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 first of these examples refers to changes which are purely administrative in nature: for example, changes to achieve consistency throughout the T/Ss, correction of errors, or changes in nomenclature. The proposed change only clarifies the present T/S. We are not proposing to reduce any present requirements. For these reasons, we believe that the example cited is applicable and that the proposed change should not involve significant hazards consideration.



TABLE 3.3-2

## REACTOR TRIP SYSTEM INSTRUMENTATION RESPONSE TIMES

<u>FUNCTIONAL UNIT</u>	<u>RESPONSE TIME</u>
1. Manual Reactor Trip	NOT APPLICABLE
2. Power Range, Neutron Flux (High and Low Setpoint)	Less than or equal to 0.5 seconds*
3. Power Range, Neutron Flux, High Positive Rate	NOT APPLICABLE
4. Power Range, Neutron Flux, High Negative Rate	Less than or equal to 0.5 seconds*
5. Intermediate Range, Neutron Flux	NOT APPLICABLE
6. Source Range, Neutron Flux	NOT APPLICABLE
7. Overtemperature delta T	Less than or equal to 6.0 seconds*
8. Overpower delta T	NOT APPLICABLE
9. Pressurizer Pressure--Low	Less than or equal to 1.0 seconds
10. Pressurizer Pressure--High	Less than or equal to 1.0 seconds
11. Pressurizer Water Level--High	NOT APPLICABLE

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\* Neutron detectors are exempt from response time testing. Response time of the neutron flux signal portion of the channel shall be measured from detector output or input of first electronic component in channel.



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