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 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Application for amend to License DPR-74, changing Tech Specs
 to extend certain surveillances that must be performed
 during shutdown & before 860331. Fee paid.

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December 13, 1985
AEP:NRC:0967

Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316
License No. DPR-74
SURVEILLANCE INTERVAL EXTENSION FOR UNIT 2 CYCLE 6

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 for Donald C. Cook Nuclear Plant Unit No. 2. Specifically, we request an extension for certain surveillances that must be performed during shutdown and before March 31, 1986. 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.

All of the changes reflect our recent decision to extend the end of Unit 2 Cycle 5 from on or before November 30, 1985 to on or before February 28, 1986. This change was necessitated by unexpected shutdowns due to steam generator tube leakage problems. The nature of these problems and their effect on plant schedule were presented to your staff in recent documentation concerning our request for certain exemptions from the provisions of 10 CFR 50.49 until February 28, 1986.

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 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.

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Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains. The number of transformed cells was determined by the number of colonies obtained on the selective medium. The results are the mean of three independent experiments. Error bars represent the standard deviation.

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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.

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

12/13/85

cm

Attachments

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspection - Bridgman

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ATTACHMENT 1 TO AEP:NRC:0967
REASONS AND 10 CFR 50.92 ANALYSES FOR
CHANGES TO THE
DONALD C. COOK NUCLEAR PLANT UNIT NO. 2
TECHNICAL SPECIFICATIONS

The purpose of the proposed amendment is to add the following footnote to several Technical Specifications:

"Those surveillances which must be performed on or before March 31, 1986 and are designated as 18-month surveillances (or required as outage-related surveillances under the provisions of Specification 4.0.5) may be delayed until the end of the refueling outage scheduled to begin on or before February 28, 1986. The provisions of Specification 4.0.2.b are not applicable to any prior surveillances which have been performed under this provision of Specification 4.0.6. It should be noted that for surveillances performed under this section, previous surveillances required by Specification 4.0.2.b will never be considered again."

For editorial purposes, a new specification, 4.0.6, is added, and reference is made to that specification by adding the appropriate footnote to the affected specifications.

The numbers of the Technical Specifications and the consequences of each change are specified below:

| <u>T/S</u> | <u>Mode</u> | <u>Effect of Change</u> |
|-------------------------|--|--|
| 4.3.1.1.1 | 1, 2, 3, 4, 5 as designated on Table 4.3-1 | Delay channel calibration for the reactor trip system |
| 4.3.1.1.2 | 1, 2, 3, 4, 5 as designated on Table 4.3-1 | Delay reactor trip system interlock function operability test |
| 4.3.1.1.3 | 1, 2, 3 as designated on Table 3.3-1 | Delay reactor trip system response time test |
| 4.3.2.1.1 | 1, 2, 3, 4 as designated on Table 4.3-2 | Delay Channel Calibration for ESFAS |
| 4.3.2.1.2 | 1, 2, 3, 4 as designated on Table 4.3-2 | Delay the ESFAS total interlock function test |
| 4.3.2.1.3 | 1, 2, 3, 4 as designated on Table 3.3-3 | Delay the ESFAS response time test |
| 4.4.6.1.b | 1, 2, 3, 4 | Delay the requirements for containment sump level and flow monitoring system channel calibration |
| 4.4.11.1.b | 1, 2, 3 | Delay the pressurizer PORV Channel Calibration |
| Table 4.3-10
Item 13 | 1, 2, 3 | Delay NMO 151, 152 and 153 calibration |
| 4.6.5.9 | 1, 2, 3, 4 | Delay performance of divider barrier seal inspections |

| <u>T/S</u> | <u>Mode</u> | <u>Effect of Change</u> |
|-------------------------|---|---|
| 4.7.9.2.b | Whenever equipment in spray/sprinkler area is required to be operable | Delay performance of preaction spray headers test for the reactor coolant pumps |
| | | Delay performance of electrical system power tests which would include: |
| 4.8.1.1.1
4.8.1.2 | 1, 2, 3, 4, 5, 6 | - Demonstration of alternate power source |
| 4.8.1.1.2
4.8.1.2 | 1, 2, 3, 4, 5, 6 | - Diesel generator 18-month testing requirements |
| 4.8.2.3.2,
4.8.2.4.2 | 1, 2, 3, 4, 5, 6 | - 250-volt battery bank and charger 18-month tests |
| 4.7.7.1 | 1, 2, 3, 4
(and 5, 6 for snubbers located on systems required to be operable in these Modes) | Delay performance of snubber tests |
| | | Delay performance of the following ECCS system tests: |
| 4.5.2 | 1, 2, 3 | - Verify automatic isolation and interlock of RHR system from RCS |
| | | - Visual inspection of containment sump |
| | | - Verify proper valve alignment and pump start following an SI signal |
| | | - Verify proper flow characteristics on ECCS pumps |
| | | - Verify mechanical stops on ECCS throttle valves |
| | | - ECCS flow balance |
| 4.5.3.1 | 4 | - Same 18-month surveillances as 4.5.2 |

The earliest of the above surveillances is to be performed by January 30, 1986. Since shutdown is scheduled for February 28, 1986, the maximum extension we are requesting with the unit at power is 29 days. Furthermore, many of the surveillances clearly state, "18 months at shutdown," which we believe was intended to indicate that the tests were to be done during the refueling outage.

All of the above surveillances are due prior to March 31, 1986. However, many of the tests are normally scheduled at the end of the outage. This extension would allow performance of the tests in a rational, orderly manner so that we can avoid disturbing the complex outage schedule with miscellaneous tests, thus unnecessarily delaying return to power operation.

We are requesting these extensions because of circumstances that we believe were beyond our control, i.e., beginning in July 1985, steam generator tube leakage problems forced the plant into unexpected outages, causing us to extend the end of the current cycle from the end of November 1985 to February 1986. These reasons were provided to the NRC in our recent request for extension from the EQ deadline specified by 10 CFR 50.49.

Moreover, many of the surveillances listed above are not due until after the unit is shut down and the plant is in a mode in which the T/S is not applicable. For these surveillances, we are requesting the extension, not for technical reasons, but simply to ensure literal compliance with the provisions of Specification 4.0.2.

For all these reasons, and because the length of the requested extension is small in relation to the overall surveillance interval allowed, we believe that although these changes may result in some increase to the probability or consequences of a previously analyzed accident, or may reduce in some way a safety margin, the results of the change appear to be clearly within all acceptable criteria with respect to the systems or components specified in the safety analysis. Therefore, we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.