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**SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, revising
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AEP:NRG:0979

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. DPR-58 and DPR-74
License Nos. 50-315 and 50-316
TECHNICAL SPECIFICATION CHANGE REQUEST: REPORTING
REQUIREMENTS ON PRIMARY COOLANT IODINE SPIKES
(GENERIC LETTER 85-19)

Attn: T. E. Murley

April 7, 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 changes to the T/S requirements associated with specific activity of the primary coolant. The changes being proposed are in accordance with changes endorsed by the NRC staff in Generic Letter 85-19. A detailed description of the changes and our analyses concerning significant hazards are contained in Attachment 1. Attachment 2 contains 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:0979

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,



M. P. Alexich .
Vice President

ldp

Attachments

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

ATTACHMENT 1 TO AEP:NRC:0979

DESCRIPTION AND 10 CFR 50.92 SIGNIFICANT HAZARDS EVALUATION

FOR CHANGES TO THE TECHNICAL SPECIFICATIONS

FOR THE DONALD C. COOK NUCLEAR PLANT UNITS 1 AND 2

Description of Change

As part of a continuing program to delete unnecessary reporting requirements, the NRC staff reviewed the reporting requirements related to primary coolant specific activity levels and determined that these reporting requirements could be modified to require reporting in the Annual Operating Report rather than in a shorter term report (Special Report or Licensee Event Report). The staff endorsement of this approach was provided in Generic Letter 85-19. Generic Letter 85-19 also endorsed elimination of the plant shutdown requirements for the case in which the iodine activity limits are exceeded for 800 hours in a 12-month period. This later endorsement was in response to the NRC staff's efforts to eliminate unnecessary T/S requirements.

We believe the changes endorsed by Generic Letter 85-19 would be beneficial to the Cook Nuclear Plant, and we are therefore proposing changes to our T/Ss which follow the guidance provided in the generic letter. We have not deviated from the generic letter guidance in any way; our proposed changes exactly follow the model specification for Westinghouse plants provided in the generic letter. We have also made appropriate changes to the Bases for the specific activity limits.

In making our T/Ss consistent with the model T/Ss, the following changes were necessary.

- 1) "3/4.4.8" was added to the title of the specification.
- 2) The phrase "primary coolant" was changed to "reactor coolant."
- 3) The less than or equal to symbols (\leq), the greater than or equal to symbols (\geq), the greater than symbols ($>$), and the less than symbols ($<$), were converted to words.
- 4) The "1.0" was changed to "1" in Specification 3.4.8.a.
- 5) The phrase "uCi/gram" was changed to "microCuries/gram."
- 6) Action a under Modes 1, 2 and 3* was deleted and Action b was changed to Action a and Action c was changed to Action b.
- 7) The portion of Action a under Modes 1, 2, 3, 4 and 5 involving the reporting requirements was deleted.
- 8) The phrase "of gross radioactivity" was added to Specification 3.4.8.b.
- 9) An additional requirement has been added to Section 6.9.1.5 to require that information regarding any instances when the I-131 specific activity limit was exceeded be submitted in the annual report.

Justification for Change

As stated in Generic Letter 85-19, NRC has reviewed the reporting requirements related to primary coolant specific activity levels and determined that requiring a short-term report is unnecessary and endorsed including the required information in the Annual Operating Report. The NRC also endorsed deletion of the requirement to shutdown a plant if the coolant iodine activity limits exceeded a specified annual limit. As stated in the generic letter, this limit is no longer necessary on the basis that proper fuel management by licensees and existing reporting requirements should preclude ever approaching this limit.

All other changes proposed to make our T/Ss consistent with the model T/Ss are editorial in nature.

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

The proposed changes are consistent with those endorsed by the NRC in Generic Letter 85-19. For the reasons stated in Generic Letter 85-19, we believe the deleted requirements are unnecessary restrictions. The proposed changes would not affect the accident analysis and the limits for the reactor coolant remain the same. The T/S requirement to shut down the plant if the coolant iodine activity limits are exceeded for more than 10% of the unit's annual operating time is an operating restriction that is no longer necessary based on a demonstration of successful operating experience as indicated in Generic Letter 85-19. Based on the above information, we believe that deletion of these requirements would not significantly increase the probability or consequences of a previously analyzed accident.

Criterion 2

The proposed changes are consistent with the changes endorsed by Generic Letter 85-19 and will not require physical alteration of the plant or changes in parameters governing normal plant

operation. We therefore believe these changes would not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

Criterion 3

The proposed changes are consistent with the changes endorsed by Generic Letter 85-19 and would not modify the present gross activity limit or dose equivalent I-131 limits. We therefore believe the proposed change would not significantly reduce a margin of safety.

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 sixth of these examples refers to changes which may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but the results of which are within limits established as acceptable. Since the proposed changes are consistent with the guidance provided in Generic Letter 85-13, we believe these changes fall within the scope of this example. The fourth of these examples refers to relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. The proposed deletion of the shutdown requirement if the iodine limits are exceeded for more than 10% of the unit's annual operating time falls within the scope of this example. Therefore we believe these changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.

ATTACHMENT 2 TO AEP:NRC:0979

PROPOSED TECHNICAL SPECIFICATION PAGES