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SUBJECT: Application for amends to Licenses DPR-58 & DPR-74,modifying Tech Specs 3/4:7.6.1 & 3/4.9.12.

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INDIANA MICHIGAN POWER

AEP:NRC:0959B

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
ESF AND STORAGE POOL VENTILATION SYSTEMS
CHARCOAL LAB TEST TEMPERATURE TECHNICAL
SPECIFICATION CHANGE

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

Attn: T. E. Murley

September 15, 1989

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 Units 1 and 2. Specifically, we are proposing to modify the Engineered Safeguards Features (ESF) and Storage Pool Ventilation System T/Ss (3/4.7.6.1 and 3/4.9.12, respectively) such that the temperature at which laboratory testing of charcoal samples is conducted is conservatively decreased from 130°C to 30°C. This change is in response to a recommendation from your staff. The reasons for the proposed change and our analysis concerning significant hazards considerations are contained in Attachment 1 to this letter. The proposed revised T/S pages are contained in Attachment 2.

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 changes have been reviewed by the Plant Nuclear Safety Review Committee and 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 to the Michigan Department of Public Health.

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1/1

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

MPA/eh

Attachments

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

ATTACHMENT 1 TO AEP:NRC:0959B

REASONS AND 10 CFR 50.92 ANALYSES FOR CHANGES

TO THE DONALD C. COOK NUCLEAR PLANT

UNITS 1 AND 2 TECHNICAL SPECIFICATIONS

This letter proposes to change the temperature at which laboratory testing of charcoal samples is conducted for the ESF and storage pool ventilation systems from 130°C to 30°C. The specific technical specifications (T/Ss) that are affected for both units by this change are:

Page No.		
Unit 1	Unit 2	
3/4 7-24	3/4 7-18	4.7.6.1.b.4
3/4 7-24	3/4 7-18	4.7.6.1.c.1
3/4 7-24	3/4 7-18	4.7.6.1.c.2
3/4 9-14	3/4 9-13	4.9.12.b.4
3/4 9-14	3/4 9-14	4.9.12.c.1
3/4 9-15	3/4 9-14	4.9.12.c.2

The staff's concern, expressed in a meeting held in the NRC's office in January 1986, was that the efficiencies determined under test conditions of 130°C might not be indicative of efficiencies that could be anticipated under accident conditions. This was because the high laboratory test temperature might cause vaporization of volatile filter contaminants, including moisture, thus increasing the indicated charcoal efficiency.

In the January 1986 meeting, members of your staff recommended that we adopt 30°C as the test temperature. The change from 130°C to 30°C is in the conservative direction. The temperature of 130°C in our present T/Ss was related to a previous T/S requirement to perform the laboratory testing of the charcoal samples in accordance with the 1975 version of ANSI N510. ANSI N510-1975, referenced the RDT M 16-1T-1973 standard for the laboratory test. This standard specified a test condition of 130°C. In T/S Amendments 124 (Unit 1) and 111 (Unit 2) we received approval to change from the 1975 version to the 1980 version. The 1980 version references ASTM D 3803 1979 as the laboratory testing standard, and states that test conditions shall be in accordance with the plant's T/Ss. In our letter AEP:NRC:0959, dated May 28, 1987, we committed to conducting parallel testing (at 30°C and 130°C) to evaluate the staff's concern. The testing was conducted over a period of approximately 18 months and involved 9 parallel tests. The testing confirmed that at 30°C, the measured charcoal efficiency is lower, and therefore we are proposing to adopt your staff's recommendation. A similar change was recently proposed for the control room ventilation system in our letter AEP:NRC:0398R, dated June 29, 1989.

We are also proposing a related administrative change in this letter. We are proposing to delineate ASTM D 3803-1979 as the test standard for the charcoal laboratory test. This was proposed for the control room ventilation system in AEP:NRC:0398R at the recommendation of your staff. Since it is equally applicable to the ESF and storage pool ventilation systems, we are proposing it for those units also.

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 analyzed or evaluated, or

(3) involve a significant reduction in a margin of safety.

Criterion 1

The change from 130°C to 30°C for the charcoal laboratory test is in the conservative direction, since the change will make it more difficult for the charcoal to meet the T/S-required efficiency. Thus, the change should increase the margin of safety, and should not involve an increase in the probability or consequences of a previously evaluated accident. The delineation of ASTM D 3803-1979 as the test standard for the charcoal is administrative in nature, and will not impact plant safety.

Criterion 2

The changes involve no physical changes to the plant nor any changes in plant operations. Therefore, the change 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 examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The second of these

examples refers to changes which constitute additional limitations, restrictions, or controls not presently included in the T/Ss. This example is applicable to the change from 130°C to 30°C for the charcoal laboratory test, since the change will make it more difficult for the charcoal to meet the T/S-required efficiency. The first example refers to changes which are purely administrative in nature. This example is applicable to the delineation of ASTM D 3803 - 1979 as the laboratory test standard for the charcoal, since ASTM D 3803-1979 is the standard referenced by ANSI N510-1980. For these reasons, we believe the examples cited are relevant and conclude that the changes should not require significant hazards consideration.