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 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
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 RECIP.NAME RECIPIENT AFFILIATION
 MURLEY,T.E. Office of Nuclear Reactor Regulation, Director (Post 870411

SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, revising
 Tech Spec 6.12.2.

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AEP:NRC:1039B

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
T/S CHANGE REQUEST ON LOCKING OF
HIGH RADIATION AREAS

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

Attn: T. E. Murley

June 25, 1990

Dear Dr. Murley:

Based on discussions with your staff, we are hereby withdrawing our application submitted in AEP:NRC:1039 in which we requested approval for a change to the Technical Specifications (T/Ss) for the Donald C. Cook Nuclear Plant Units 1 and 2. Our AEP:NRC:1039 proposal involving stationing designated individuals at the entrance to high radiation areas in lieu of locked doors, as required by T/S 6.12.2, under certain conditions.

Your staff further advised us to resubmit this application, requesting approval to substitute roped-off areas with postings and a flashing light device for the locked doors for high radiation areas required by T/S 6.12.2.

A detailed description of the proposed change and our analysis concerning significant hazards considerations are contained in Attachment 1. The proposed revised T/S pages are contained in Attachment 2.

We believe that the proposed change 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 and the Nuclear Safety and Design Review Committee.

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Handwritten: Add: NRR/DREP/RRP *Str. Encl*

Dr. T. E. Murley

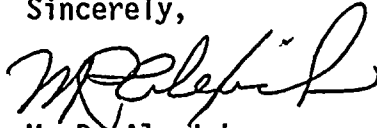
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AEP:NRC:1039B

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 the NFEM Section Chief.

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

Attachments

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
J. R. Padgett
NFEM Section Chief
G. Charnoff
NRC Resident Inspector - Bridgman
A. B. Davis - Region III

ATTACHMENT 1 TO AEP:NRC:1039B
REASONS AND 10 CFR 50.92 ANALYSIS FOR
CHANGES TO THE
DONALD C. COOK NUCLEAR PLANT UNIT NO. 1 AND UNIT NO. 2
TECHNICAL SPECIFICATIONS

DESCRIPTION OF CHANGE

Technical Specification (T/S) 6.12.2 presently requires that locked doors be provided to prevent unauthorized entry into high radiation areas in which the dose rate is greater than 1000 mrem/hr. Because we have some areas where it is not practicable to provide a locked door, on the NRC staff's advice we are requesting approval to implement the standard Technical Specifications provisions. Specifically, we are proposing to create a roped-off area that is conspicuously posted and has a flashing light warning device. This provision will only be used in areas where providing a locked door is not possible or not practicable due to area size or configuration.

This change was discussed with members of your staff and is consistent with the Westinghouse Standard Technical Specifications. Also, we have noted the concerns expressed in NRC Information Notice 88-79, "Misuse of Flashing Lights For High Radiation Area Controls." As stated above, we will only invoke this provision for areas where a locked door is not a viable solution to controlling access.

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

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

Criterion 1

Changing the access control requirements for high radiation areas does not impact any of the previously analyzed accidents. Therefore, we believe that this change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The proposed change does not involve a change in plant configuration or operation and will not place the plant in an unanalyzed condition; therefore, we believe the change will not create the

possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

We believe that the use of flashing lights in a specifically posted area will provide adequate protection against unauthorized entry into areas with dose rates exceeding 1000 mrem/hr. The proposed change is consistent with the language contained in the Westinghouse Standard T/Ss. Based on this information, we believe that the change will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14780) of amendments considered not likely to involve significant hazards considerations. We believe the proposed change is less likely than the sixth example in the above guidance to involve a significant hazards consideration. We believe that roping off the area and posting a flashing light will provide adequate protection against unauthorized entry into high radiation areas where providing locked doors is not possible or practicable. Therefore, we believe the proposed change will not result in an increase in the probability or consequences of a previously analyzed accident or reduce a margin of safety, and does not involve a significant hazards consideration as defined in 10 CFR 50.92.