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SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, making  
 Tech Specs more consistent w/ASME Code requirements.

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AEP:NRC:0433N

Donald C. Cook Nuclear Plant Units 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
CHANGES TO MAKE TECHNICAL SPECIFICATIONS  
MORE CONSISTENT WITH ASME CODE REQUIREMENTS

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

Attn: T. E. Murley

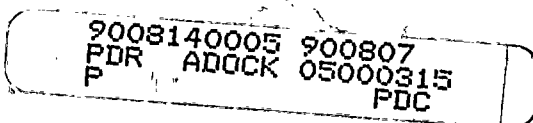
August 7, 1990

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. In AEP:NRC:0433L dated July 3, 1986, we submitted a T/S change request intended to make our Unit 1 surveillance requirements more consistent with our Unit 2 requirements and our IST Program. During subsequent discussions with your staff in October 1987, a decision was made to withdraw AEP:NRC:0433L and submit a revised letter which would better suit our current needs. This letter is intended to satisfy that commitment. We have expanded our submittal to include additional changes. These additional changes include deleting valve cycling requirements which are redundant to the requirements of our IST Program and increasing the surveillance interval for pump testing to be consistent with the recommendations of Section XI of the ASME Boiler and Pressure Vessel Code. A detailed description of the proposed changes and our analyses concerning significant hazards considerations are included in Attachment 1 to this letter. 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 amount of any effluents 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 by the Nuclear Safety and Design Review Committee.



*Adol*  
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Dr. T. E. Murley

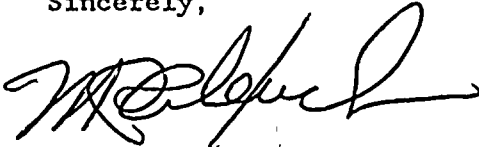
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AEP:NRC:0433N

In compliance with the requirements of 10 CFR 50.91(b)(1), copies of this letter and its attachments have been transmitted to J. R. Padgett of the Michigan Public Service Commission and to the Michigan Department of Public Health.

This document has been prepared following Corporate procedures which 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', is written over the typed name.

M. P. Alexich  
Vice President

ldp

Attachments

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

Attachment 1 to AEP:NRG:0433N

Reasons and 10 CFR 50.92 Significant Hazards  
Evaluation for Changes to the Technical Specifications  
for Donald C. Cook Units 1 and 2



The proposed changes in this letter are intended to achieve greater consistency between our Unit 1 T/Ss, our Unit 2 T/Ss, and our IST Program. A description of each change is provided below.

1. Changes to Make Pump Testing Surveillance Intervals Consistent With ASME Code Requirements

Present regulatory policy requires that safety-related pumps installed in water-cooled nuclear power plants be tested in accordance with Section XI of the ASME Boiler and Pressure Vessel Code (ASME Code). In accordance with this policy, the Donald C. Cook Nuclear Plant has instituted an IST Program based on the 1983 edition of the ASME Code (including the summer 1983 addendum). The ASME Code endorses quarterly testing of safety-related pumps to assess the operational readiness of the pumps during their service life; however, many of our existing Technical Specifications (T/Ss) require pump testing on a monthly or weekly basis. We believe that pump reliability and operational readiness can be satisfactorily demonstrated by conducting pump testing on a quarterly basis as endorsed by the ASME Code. We are therefore requesting that the T/Ss be changed to allow quarterly testing. The pumps for which we are requesting this change are the residual heat removal (RHR) pumps, the safety injection (SI) pumps, the containment spray (CTS) pumps, the centrifugal charging pumps (CCPs), the component cooling water (CCW) pumps, the essential service water (ESW) pumps, the boric acid transfer (BAT) pumps, and the auxiliary feedwater (AFW) pumps.

In AEP:NRC:0433 dated May 10, 1983, we requested changes similar to those we are currently requesting, but withdrew the request while we completed a pump reliability study to support our request. This reliability study was performed by reviewing the test results and data for each subject pump between 1980 and August 1989. A general overview of the results of our survey show that most cases in which a pump was initially declared inoperable, a successful retest was performed indicating instrumentation and data taking problems. In the few remaining cases, the test values were analyzed and new reference values established or pumps had to be repaired/replaced due to degradation or failure. A careful review showed that in these latter cases, quarterly testing would not have had a negative impact. The requested T/S change and a summary of our review for the subject pumps are provided below.

RHR Pumps

We are proposing to delete the phrase "at least once per 31 days on a STAGGERED TEST BASIS" from T/S 4.5.2.f to allow testing of the RHR pumps on a quarterly basis as endorsed by the ASME Code. The results of our reliability study for the RHR pumps are as follows:

Review of the test data for the east and west RHR pumps showed instances of high differential pressure and low flow; however, in all cases, the pump was retested and found to be acceptable. Therefore, in no case did we find a pump which was actually degraded.

SI Pumps

We are proposing to delete the phrase "at least once per 31 days on a STAGGERED TEST BASIS" from Unit 1 T/S 4.5.2.f to allow testing of the SI pumps on a quarterly basis as endorsed by the ASME Code. The results of our reliability study for the SI pumps are as follows:

Review of the test data for the north and south SI pumps found no cases in which a pump was actually degraded.

CCPs

We are proposing to delete the phrase "at least once per 31 days" from T/S 4.1.2.3.1 and the phrase "at least once per 31 days on a STAGGERED TEST BASIS" from T/S 4.1.2.4 and 4.5.2.f to allow testing of the CCPs on a quarterly basis as endorsed by the ASME Code. The results of our reliability study for the CCPs are as follows:

Review of the test data for the east and west CCPs found no cases in which a pump was actually degraded.

CTS Pumps

We are proposing to delete the phrase "at least once per 31 days on a STAGGERED TEST BASIS" from T/S 4.6.2.1.b to allow testing of the CTS pumps on a quarterly basis as endorsed by the ASME Code. The results of our reliability study for the CTS pumps are as follows:

Review of the test data for the east and west CTS pumps found no cases in which a pump was actually degraded.





ESW Pumps

We are proposing to change T/S 4.7.4.1.C to state "By verifying pump performance pursuant to Specification 4.0.5" to allow testing of the ESW pumps on a quarterly basis as endorsed by the ASME Code. The results of our reliability study for the ESW pumps are as follows:

The east and west ESW pumps had instances of high differential pressure but were successfully retested. In addition, one instance of not meeting the minimum operability limit (pressure) was recorded. In this case, it was determined that the basis for computing the minimum operability limit was incorrect and the pump was successfully retested. This same pump was taken out of service, upon further degradation of pressure, and replaced within the 72-hour limit. Approximately one year later the east ESW pump failed due to a broken shaft and was replaced within the 72-hour limit. In these latter two instances, frequency of testing was not a factor. Pump degradation would have been tracked on a quarterly basis as well as monthly and the mechanical failure could not have been trended. The west pump was also replaced in 1987 when it approached the minimum operability limit on pressure. This instance would also have been adequately tracked on a quarterly basis.

CCW Pumps

We are proposing to change T/S 4.7.3.1.C to state "By verifying pump performance pursuant to Specification 4.0.5" to allow testing of the CCW pumps on a quarterly basis as endorsed by the ASME Code. The results of our reliability study for the CCW pumps are as follows:

Review of the test data for the east and west CCW pumps found no instances in which a pump was actually degraded.

BAT Pumps

We are proposing to replace the existing provisions of T/S 4.1.2.5 and 4.1.2.6 with a provision referencing Specification 4.0.5. This will allow testing of the BAT pumps on a quarterly basis as endorsed by the ASME Code. Except for the change in testing frequency, this change is consistent with those changes approved for the CCPs, RHR pumps, SI pumps, and CTS pumps in Amendment 98 to the Unit 1 T/Ss. The results of our reliability study for the BAT pumps are as follows:

Review of the test data for the BAT pumps found no cases in which a pump was actually degraded.



AFW Pumps

We are proposing to delete the phrases, "At least once per 31 days by:" and "At least once per 18 months during shutdown by:" and add the phrase "when tested pursuant to Specification 4.0.5 by:" to T/S 4.7.1.2 to allow testing of the AFW pumps on a quarterly basis as endorsed by the ASME Code. The results of our reliability study for the AFW pumps are as follows:

Review of the test data for the AFW pumps found no cases in which a pump was actually degraded.

To further support the proposed quarterly test frequency on the BAT, CCP, CCW and ESW pumps, it should be noted that one pump from each of these sets of pumps is continuously operating during most modes of unit operation. Each pump is operated, on a staggered basis, until the idle pump is scheduled to be tested at which time the operating pump is secured and the previously idle pump remains in service after its test run. Operations personnel perform general checks on the operating pumps every shift. These checks may consist of observing for unusual noise, smells, or leakage, checking for proper oil levels on pumps and motors, and checking pump parameters. The extent of the checking depends on available instrumentation, type of pump, accessibility, etc.

We feel that the above information supports our contention that quarterly testing will properly demonstrate the reliability and operational readiness of the pumps outlined above. In addition, the following facts lend support to quarterly testing:

1. The reduction in frequency will actually improve reliability by eliminating unnecessary pump cycling.
2. Spare parts, pump rotors and bowl assemblies are adequately stocked to provide rapid pump repair should failure occur.
3. Plant Procedure 12 THP 5070 PER.001, "Review of Inservice Testing of Pumps," requires trending of test data to observe for pump performance degradation. Review of degrading trends assists in scheduling maintenance by extrapolating when performance parameters will not meet the more conservative value of either minimum operability limits or IST alert/action limits. Maintenance can therefore be scheduled and performed prior to the pump reaching such limits.



4. Historical pump performance data indicates that when degradation trends are observed, the development of such trends evolve over periods greater than three months. The change of test frequency from monthly to quarterly will therefore not affect our ability to detect degrading trends.

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

#### Criterion 1

Quarterly testing of the subject Unit 1 pumps is endorsed by the ASME Code and has been approved for Unit 2 and the Westinghouse Standard T/Ss (NUREG-0452, Rev. 4). In addition, we believe that the results of our reliability study have shown that quarterly testing would not have had a negative impact on trending past degradation and in ensuring pump reliability. Quarterly testing should be sufficient to adequately assess the operational readiness of these pumps during their service life and will actually improve their reliability by eliminating unnecessary cycling. We therefore believe that the proposed changes will not result in a significant increase in the probability or consequences of any accident previously analyzed.

#### Criterion 2

Extending the surveillance intervals will not result in a change in plant configuration or operation, and we therefore believe that the proposed changes will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

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Criterion 3

Quarterly testing of the subject Unit 1 pumps is endorsed by the ASME Code and has been approved for Unit 2 and the Westinghouse Standard T/Ss (NUREG-0452, Rev. 4). In addition, we believe that the results of our reliability study have shown that quarterly testing would not have had a negative impact on trending past degradation and in ensuring pump reliability. Quarterly testing should be sufficient to adequately assess the operational readiness of these pumps during their service life and will actually improve their reliability by eliminating unnecessary cycling. Therefore, we believe that the proposed changes will not result in a significant reduction in the margin of safety.

Lastly, we note that the Commission has provided guidance concerning the determining of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve a significant hazards consideration. This change is similar to the sixth example, which refers to changes that might result in some increase in the probability of occurrence or consequences of a previously analyzed accident, but the results of which are clearly within limits established as acceptable. We believe these changes are clearly within acceptable limits since they are endorsed by Section XI of the ASME Code, and based on past history, there is no reason to believe that quarterly testing would have a negative impact on pump reliability. In addition, quarterly testing has been approved for Unit 2 and the Westinghouse Standard Technical Specifications (NUREG-0452, Rev. 4) (STS). Based on the above, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

2. Valve Cycling Requirements Changes

The changes proposed in this section are similar to the changes approved for T/Ss 4.5.2, 4.6.2.1, 4.7.3.1, and 4.7.4.1 in Amendment 98 to the Unit 1 T/Ss.

The existing provisions of Specifications 4.1.2.1.a.1, 4.1.2.2.a.1, and 4.6.2.2.a.1 require that each testable power operated or automatic valve in the subject flow path be cycled through at least one complete cycle of full travel at least once per 7 or once per 31 days. This requirement is redundant to our Valve IST Program and the ASME Code except that our IST Program and the ASME Code only require testing on a quarterly, rather than weekly or monthly, basis. These changes are similar to those approved for other systems



in Amendment 98 to the Unit 1 T/Ss. The SER for Amendment 98 stated that the Commission has long advocated the frequency and test requirements of the Section XI Code and that testing valves more frequently has not improved safety but does create more opportunity for the tested valves to be inadvertently left in the wrong position. These changes are also consistent with our Unit 2 T/Ss and the STS. We are therefore proposing to delete these specific requirements and allow the valve cycling for these valves to be done quarterly in accordance with our IST Program, the ASME Code, and Specification 4.0.5.

The existing provisions of Specifications 4.1.2.2.c and 4.6.2.2.c.1 require that each power-operated valve in the flow path that is not testable during plant operation be cycled through at least one complete cycle of full travel at least once per 18 months during shutdown. This requirement is redundant to provisions in our Valve IST Program, the ASME Code, and Specification 4.0.5. We are therefore proposing to delete the specific requirements from the T/Ss. This change is consistent with both our Unit 2 T/Ss and the STS.

The Unit 2 provisions for the boron injection flow paths include a requirement to verify that each automatic valve in the flow path actuates to its correct position on an RWST sequencing signal every 18 months. We have included this requirement in Unit 1 as Specification 4.1.2.2.c.

The existing provisions of Specification 4.7.1.5 require part-stroke exercising of the steam generator stop valves on a quarterly basis and verifying full closure within 5 seconds while in hot standby with  $T_{avg}$  greater than or equal to  $541^{\circ}\text{F}$  during each reactor shutdown except that verification need not be done more often than once per 92 days. All the requirements of this specification except for the  $541^{\circ}\text{F}$  requirement are included in our Valve IST Program. The temperature requirement of  $541^{\circ}\text{F}$  is addressed in surveillance test 1-OHP.4030.STP.019F during valve testing in Mode 3. We are therefore deleting the specific requirement to allow testing in accordance with Specification 4.0.5. This change is consistent with both the Unit 2 T/Ss and the STS.

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

#### Criterion 1

The purpose of the proposed changes in this section is to make our Unit 1 T/Ss more consistent with our Unit 2 T/Ss, the STS, and ASME Code requirements. The requirements of the ASME Code, the Unit 2 T/Ss, and the STS have previously been found acceptable and no relevant Unit 1 specific parameters differ significantly from Unit 2. In addition, we believe that testing these valves more frequently than quarterly does not improve safety but does create more opportunity for the tested valves to be inadvertently left in the wrong position. We therefore believe these changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

#### Criterion 2

The proposed changes of this section introduce no new plant configurations or operating conditions and do not create a condition that has not been previously analyzed; therefore, we believe the changes will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

#### Criterion 3

Since testing the valves more frequently than quarterly will not improve safety and only create more opportunity for leaving the valves in the wrong position and since the level of safety previously approved for Unit 2 will be maintained, we believe that these changes will not involve a significant reduction in a margin of safety.

Lastly, we note that the Commission has provided guidance concerning the determining of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely

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to involve a significant hazards consideration. This change is similar to the sixth example, which refers to changes that might result in some increase in the probability of occurrence or consequences of a previously analyzed accident, but the results of which are clearly within limits established as acceptable. We believe this change is clearly within acceptable limits since it was approved for the STS and the Unit 2 T/Ss and no relevant Unit 1 parameters differ significantly from Unit 2. Based on the above, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

3. Changes to Update from 1974 Code to 1983 Code

As required by 10 CFR 50.55a, we are updating our surveillance program to the standards set out in the 1983 edition of the ASME Code. Specification 4.0.5 requires that we test in accordance with 10 CFR 50.55a; however, some of our T/Ss still reference the 1974 edition of the ASME Code rather than Specification 4.0.5. We are therefore correcting our T/Ss by making the following changes.

The existing provisions of Specification 4.4.3 require that each pressurizer code safety valve be demonstrated operable in accordance with the 1974 edition of the ASME Code. We are proposing to update our T/S to the 1983 edition of the code by deleting the current wording and referencing Specification 4.0.5. The Bases for Specification 4.4.3 also reference the 1974 edition of the code and thus a similar change is being incorporated into the Bases. These changes are consistent with both the Unit 2 T/Ss and the STS.

The provisions of Specification 4.4.9.3.3 require that each PORV and the RHR safety valve be demonstrated operable by testing in accordance with the 1974 edition of the ASME Code. We are proposing to update our T/Ss to the 1983 edition of the code by referencing Specification 4.0.5. We have also clarified this T/S by separating the requirements for the PORVs and the RHR safety valve. These changes are consistent with the Unit 2 T/Ss and the STSs except that the STSs do not address the RHR safety valve.

The provisions of Specification 4.7.1.1 require that each main steam line code safety valve be demonstrated operable in accordance with the 1974 edition of the ASME Code. We are proposing to update our T/Ss to the 1983 edition of the code by deleting the current wording and referencing Specification 4.0.5. The lift settings and orifice sizes given in Table

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4.7-1 are not included as part of the ASME Code and we have therefore retained this table and moved its reference to the LCO. These changes are consistent with both the Unit 2 T/Ss and the STSs.

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

#### Criterion 1

The proposed changes in this section are intended to update certain Unit 1 T/Ss to reference Specification 4.0.5 rather than the 1974 edition of the ASME Code. These changes thereby allow testing of the subject components to be done in accordance with the 1983 edition of the ASME Code as required by 10 CFR 50.55a. The subject Unit 2 T/Ss already reference Specification 4.0.5 and this change therefore makes the Unit 1 T/Ss more consistent with the Unit 2 T/Ss. The 1983 edition of the ASME Code and its application to the subject Unit 2 T/Ss has previously been found acceptable. No relevant Unit 1 specific parameters differ significantly from Unit 2. We therefore believe the proposed changes of this section will not involve a significant increase in the probability or consequences of an accident previously evaluated.

#### Criterion 2

The proposed changes in this section introduce no new plant configurations or operating conditions and do not create a condition that has not been previously analyzed; therefore, we believe the changes will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

Criterion 3

These changes update the Unit 1 T/Ss to the edition of the ASME Code required by the federal regulations and will maintain the level of safety previously approved for Unit 2. Therefore, we believe that these changes will not involve a significant reduction in a margin of safety.

Lastly, we note that the Commission has provided guidance concerning the determining of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve a significant hazards consideration. This change is similar to the sixth example, which refers to changes that might result in some increase in the probability of occurrence or consequences of a previously analyzed accident, but the results of which are clearly within limits established as acceptable. We believe this change is clearly within acceptable limits since the 1983 edition of the ASME Code and its application to the subject Unit 2 T/Ss has been previously approved and no relevant Unit 1 parameters differ significantly from Unit 2. Based on the above, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

4. Editorial Change

The top three lines on page 3/4 6-15 repeat what is at the bottom of page 3/4 6-14. We are therefore proposing to delete the redundant lines on page 3/4 6-15. We are proposing to write out mathematical symbols where they appear on the T/S pages that are being submitted in this packet, e.g., greater than or equal to instead of  $\geq$ . These are editorial changes and therefore we believe they will not involve a significant increase in the probability or consequences of a previously analyzed accident, create the possibility of a new or different kind of accident, or involve a significant reduction in a margin of safety.

In addition, we note that the Commission has provided guidance concerning the determining of significant hazards by providing certain examples (48 FR 14870) of amendments not considered likely to involve a significant hazards consideration. This change is similar to the first example, which refers to a change which is purely an administrative change to the technical specifications: for example, a change to achieve consistency throughout the T/Ss, correction of an error, or a change in nomenclature. This change is like this example since it is an editorial change intended to correct an error. Based on the above, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.



Attachment 2 to AEP:NRC:0433N

Proposed Revised Technical Specification Pages