ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9103060047 DOC.DATE: 91/02/27 NOTARIZED: NO DOCKET #
FACIL:50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
AUTH.NAME AUTHOR AFFILIATION
ALEXICH,M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
RECIP.NAME RECIPIENT AFFILIATION
MURLEY,T.E. Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-58 & DPR-74,modifying Tech Spec Section 3.6.3.1 re containment isolation valves to provide exemption from requirements of Tech Spec 3.0.4 under certain circumstances.

DISTRIBUTION CODE: A001D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 9+6
TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD3-1 LA	1	1	PD3-1 PD	1	1
	COLBURN,T.	2	2			
INTERNAL:	NRR/DET/ECMB 9H	1	1	NRR/DET/ESGB	1	1
	NRR/DOEA/OTSB11	1	1	NRR/DST 8E2	1	1
	NRR/DST/SELB 8D	1	1	NRR/DST/SICB 7E	1	1
	NRR/DST/SRXB 8E	1	1	NUDOCS-ABSTRACT	1	1
	OC/LFMB	1	0	OGC/HDS2	1	0
	REG FILE 01	1	1	RES/DSIR/EIB	1	1
EXTERNAL:	NRC PDR	1	1	NSIC	1	1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 18 ENCL 16

RIDS/ADDS

RIDS/ADDS

Indiana Michigan
Power Company
P.O. Box 16631
Columbus, OH 43216

INDIANA MICHIGAN POWER

AEP:NRC:1036B

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
TECHNICAL SPECIFICATION 3.0.4 EXEMPTION FOR
CONTAINMENT ISOLATION VALVES

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

Attn: T. E. Murley

February 27, 1991

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 propose to modify Section 3.6.3.1 (Containment Isolation Valves) to provide an exemption to the requirements of T/S 3.0.4 under certain circumstances.

Our reasons for the proposed changes, as well as our analyses concerning significant hazards considerations, are contained in Attachment 1 to this letter. The proposed revised T/Ss pages are contained in Attachment 2. The current T/Ss marked-up to reflect the proposed changes are contained in Attachment 3.

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 effluents 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 by the Nuclear Safety and Design Review Committee.

In compliance with the requirements of 10CFR50.91(b)(1), copies of this letter and its attachments have been transmitted to Mr. J. R. Padgett of the Michigan Public Service Commission and to the Michigan Department of Public Health.

A001
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

dfw

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:NRC:1036B

REASONS AND 10CFR50.92 ANALYSIS FOR CHANGES TO THE

DONALD C. COOK NUCLEAR PLANT

TECHNICAL SPECIFICATIONS

We are proposing to add an exemption to the requirements of Technical Specification (T/S) 3.0.4 for containment isolation valves required to be operable pursuant to T/S 3/4.6.3.1. The T/S 3.0.4 exemption will allow mode change with inoperable containment isolation valves (provided the action requirements of the T/Ss are met).

The action statement requirements of T/S 3.6.3.1 are that, within 4 hours, the valve must be restored to operable status or the affected penetration isolated by at least one deactivated automatic valve secured in the isolation position or at least one closed manual valve or blind flange. If a valve is found inoperable in Mode 1, the affected penetration could simply be isolated and power operation could proceed (provided, of course, that the isolation of the penetration does not require entry into another T/Ss action statement because of impact on a particular system's operability). However, if the problem surfaces in a mode other than Mode 1, the ascent to power operation is precluded because of the lack of an exemption of the requirements of T/S 3.0.4. This is an inconsistency in the T/Ss which is corrected by our proposed addition of the T/S 3.0.4 exemption.

From a safety perspective, assurance that the containment penetration is properly isolated is accomplished by following the action requirements of T/S 3.6.3.1. This is recognized by the present T/S, which allows continued operation in Mode 1 with an isolated penetration.

Problems with inconsistent application of T/S 3.0.4 exemptions were recognized by the NRC in Generic Letter 87-09. In that generic letter, the staff stated:

> Specification 3.0.4 . . . precludes entering a mode or specified condition if an LCO is not met, even if the Action Requirements would permit continued operation of the facility for an unlimited period of time. Generally, the individual specifications that have Action Requirements which allow continued operation note that Specification 3.0.4 does not apply. However, exceptions to Specification 3.0.4 have not been consistently applied and their bases are not well documented. For example, approximately two-thirds of the actions which permit continued operation in the Westinghouse STS are exempt from Specification 3.0.4. Although the staff

encourages the maintenance of all plant systems and components in an operable condition as a good practice, the T/Ss generally have not precluded entering a mode with inoperable equipment when the Action Requirements include remedial measures that provide an acceptable level of safety for continued operation.

Generic Letter 87-09 states that nothing in the staff's position discussed above "should be interpreted as endorsing or encouraging a plant startup with inoperable equipment. The staff believes that good practice should dictate that the plant startup should normally be initiated only when all required equipment is operable and that startup with inoperable equipment must be the exception rather than the rule." The following discussion describes the controls established at the Cook Nuclear Plant that address the NRC's concern.

Control of maintenance at Cook Nuclear Plant is accomplished via Plant Manager Instruction (PMI) 2290, "Job Orders." This instruction includes a prioritized system of control which divides corrective maintenance into prioritized categories with regard to urgency, and designates the individual or organization authorized to assign the job priority.

The following summarizes the highlights of the corrective maintenance priorities:

Priority-10

A. A job order specifying work that must be initiated and worked immediately to eliminate danger of personnel injury, damage to the facility, loss of generating capacity, or to protect the public health and safety.

Priority-20

A. A job order which specifies work that must be initiated promptly and which, if delayed beyond the time or event indicated, will seriously jeopardize plant operation.

B. A job order, which does not meet the criteria of priority 10, that concerns T/Ss-related equipment that has been declared inoperable and is in an action statement.

C. A job order involving T/Ss-related equipment, failure of which will cause the initiation of an "event initiated" T/Ss surveillance requirement.

Priority-30

A. A job order on T/Ss-related or safety-related equipment that, by definition, does not fit into Priority 10 or 20.

B. A job order that does not fit into Priority 10 or 20 but is listed in the Control Room Open Items listing.

Maintenance job orders written to repair inoperable equipment that is required by the T/Ss to be operable will receive a Priority 10 or 20. Priority 10 is reserved for items of an immediate safety or plant availability concern and requires action to begin immediately and to continue on a 24-hour basis until the problem is under control. Priority 10 maintenance orders are rarely written. Therefore, Priority 20 maintenance job orders are generally the highest priority to be worked. This ensures that maintenance work to satisfy an LCO receives high priority.

The following are the controls currently in place to ensure that mode changes do not occur with an LCO in a degraded mode without the required review and approval:

1. The "Plant Heatup From Cold Shutdown to Hot Standby" procedure (OHP 4021.001.001) and the "Reactor Startup Procedure" (OHP 4021.001.002) require signoff by the responsible department heads that all T/Ss surveillance requirements for the mode to be entered have been completed. Entry into Modes 4 and 3 requires an Equipment Checklist to be completed and signed off by a supervisor and entry into Mode 3 requires a review of the following logs with respect to Mode 3 T/Ss and other administrative requirements.

- o Temporary modification log book
- o Control room surveillance book
- o Control room log
- o Shift supervisor's log
- o T/S open items log
- o Clearance permit log
- o Caution tag log
- o Non T/Ss-related equipment status log

2. Per PMI-4030, "Technical Specifications Review and Surveillance," mode changes while in a T/Ss action statement, when permitted by T/S 3.0.4, can only be made after review and approval by the operations department superintendent and the plant manager. Efforts to return the equipment to operability will continue unaffected by the mode change.

The above-described administrative controls to limit the use of T/S 3.0.4 exceptions are currently in place. Our plant operators are aware of and have been instructed in the controls established to limit the use of the 3.0.4 exceptions.

10CFR50.92 Evaluation

Per 10CFR50.92, 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.

Criterion 1

Adequate isolation of affected containment penetrations is ensured by following the requirements of the action statement in T/S 3.6.3.1. This requires the penetration be isolated by at

least one deactivated automatic valve secured in the isolation position or by use of at least one closed manual valve or blind flange. Continued power operation is permitted in Mode 1 with an inoperable containment isolation valve provided the requirements of the action statement are followed. The T/Ss requirements are inconsistent, however, in that mode change is prohibited even though continuous power operation is permitted. Since the T/Ss action requirements specify an adequate level of protection, we believe the change does not involve a significant increase in the probability or consequences of an accident previously analyzed.

Criterion 2

The change involves no physical modifications to Cook Nuclear Plant, nor any changes in the design basis. The change should not, therefore, create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

Adequate isolation of affected containment penetrations is ensured by following the requirements of the T/S 3.6.3.1 action statement. This requires the penetration to be isolated by at least one deactivated automatic valve secured in the isolation position or by use of at least one closed manual valve or blind flange. Continued power operation is permitted in Mode 1 with an inoperable containment isolation valve, provided the requirements of the action statement are followed. The T/Ss requirements are inconsistent, however, in that mode change is prohibited even though continuous power operation is permitted. Since the T/Ss action requirements specify an adequate level of protection, we believe 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 examples (48FR14870) of amendments considered not likely to involve significant hazards consideration. The first example refers to changes that are administrative in nature: for example, a change to achieve consistency throughout the technical specifications. Although this change is not purely administrative in nature, it is related to this example in that it achieves consistency within T/S 3.6.3.1 in that mode change is not precluded, consistent with the allowance of continuous power operation in Mode 1. The sixth example refers to a change which may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results

of the change are clearly within limits established as acceptable. Problems with inconsistent application of T/S 3.0.4 exemptions have been noted previously by the NRC in Generic Letter 87-09. The acceptability of continuous power operation with containment penetrations isolated per the action statement requirements has already been established. This change only extends that acceptability to allow mode change. Thus, we conclude that the sixth example is applicable to this change.