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SUBJECT: Application for amends to licenses DPR-58 & DPR-74, modifying
 TS 5.3.1 to allow fuel reconstitution, per GL 90-02, Suppl 1.

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May 25, 1995

AEP:NRC:1124B

Docket Nos.: 50-315
50-316

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

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
PROPOSED TECHNICAL SPECIFICATION
AMENDMENT TO ALLOW FUEL RECONSTITUTION
(GENERIC LETTER 90-02 SUPPLEMENT 1)

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 T/S 5.3.1 to allow fuel reconstitution.

The proposed amendment is a line item improvement based on the recommendations of generic letter (GL) 90-02 supplement 1, "Alternative Requirements for Fuel Assemblies in the Design Features Section of Technical Specifications." The proposed changes will permit removal of suspected defective fuel rods, allowing for future reductions in occupational radiation exposure, and plant radiological releases.

Attachment 1 provides a detailed description of the proposed changes, the justification for the changes, and our determination of no significant hazards consideration performed pursuant to 10 CFR 50.92. Attachment 2 contains the existing T/S pages marked to reflect the proposed changes. Attachment 3 contains the proposed revised T/S pages.

We believe the proposed changes will not result in (1) a significant change in the types 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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In compliance with the requirements of 10 CFR 50.91(b)(1), copies of this letter and its attachments have been transmitted to the Michigan Public Service Commission and to the Michigan Department of Public Health.

Sincerely,



E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 25th DAY OF May 1995



Notary Public

My Commission Expires: 6-28-99

eh

Attachments

cc: A. A. Blind
G. Charnoff
J. B. Martin
NFEM Section Chief
NRC Resident Inspector - Bridgman
J. R. Padgett

ATTACHMENT 1 TO AEP:NRC:1124B

DESCRIPTION AND JUSTIFICATION OF CHANGES

10 CFR 50.92 ANALYSIS FOR CHANGES
TO THE DONALD C. COOK NUCLEAR PLANT
UNITS 1 AND 2 TECHNICAL SPECIFICATIONS

I. DESCRIPTION OF CHANGES

We are proposing to modify technical specification (T/S) 5.3.1 (Design Features - Fuel Assemblies) to allow for fuel reconstitution. The modified statement permits "limited substitutions of zirconium alloy or stainless steel filler rods, in accordance with NRC-approved applications of fuel rod configurations."

II. JUSTIFICATION FOR CHANGES

The proposed T/S amendment is a line item improvement based on the guidance of generic letter (GL) 90-02 supplement 1, "Alternative Requirements for Fuel Assemblies in the Design Features Section of Technical Specifications."

The present T/S requirement for fuel assemblies specifies the quantity of fuel assemblies and the number of fuel rods per assembly. Flexibility to deviate from the number of fuel rods per assembly is desirable to permit removal of fuel rods that are found to be leaking or are determined to be probable sources of future leakage, so that reuse of the majority of the affected fuel assembly is permitted with minimal impact on core design for the subsequent fuel cycle. This improvement may provide reductions in future occupational radiation exposure and plant radiological releases.

The proposed change to allow reconstitution is consistent with the recommendation of GL 90-02 supplement 1. Substitution is limited to zirconium alloy or stainless steel filler rods (i.e., no open water channels are permitted). Also, substitution must be in accordance with "NRC-approved applications of fuel rod configurations." Generic letter 90-02 supplement 1 states:

"The staff considers an NRC-approved methodology to be any methodology that the NRC staff has explicitly approved in a written safety evaluation or a plant-specific technical basis. That NRC-approved methodology must be used only for the purpose and the scope of application specified in the reviewed document as approved or modified in the NRC approval documentation."

We are submitting this amendment only as a contingency should the need arise in the future. As required by these proposed changes, any reconstitution performed will be done in

accordance with an already approved methodology, or a specific methodology will be submitted for NRC approval.

III. 10 CFR 50.92 CRITERIA

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

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

Criterion 1

The proposed changes only modify the T/Ss such that reconstitution is recognized as acceptable under very limited circumstances. Reconstitution is limited to substitution of zirconium alloy or stainless steel filler rods, and must be in accordance with approved applications of fuel rod configurations. Although these changes permit reconstitution to occur without the need for a specific T/S change, an approved methodology is required prior to its application. Since the changes will allow substitution of filler rods for leaking or potentially leaking rods, the changes may actually reduce the radiological consequences of an accident. It is noted that the specific changes requested in this letter have previously been found acceptable by the NRC in GL 90-02 supplement 1. For these reasons, we conclude that the changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated because they will only affect the assembly configuration and can only be implemented in accordance with an NRC-approved methodology. The other aspects of plant design, operation limitations, and responses to events will remain unchanged. It is noted that the changes have previously been determined acceptable by the NRC in GL 90-02 supplement 1.

Criterion 3

The proposed amendment will not involve a significant reduction in a margin of safety because the changes can only be implemented in accordance with an NRC-approved methodology. It is noted that the changes have previously been determined acceptable by the NRC in GL 90-02 supplement 1.