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SUBJECT: Application for amends to licenses DPR-58 & DPR-74, revising
 TS 4.8.1.1.2.e.7 to reduce duration of surveillance testing
 for EDGs during refueling operations from 24 h to 8 h.

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June 15, 1995

AEP:NRC:0896V

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
TECHNICAL SPECIFICATION CHANGES
TO MODIFY SURVEILLANCE TESTING OF THE
EMERGENCY DIESEL GENERATORS
DURING REFUELING

This letter and its attachments constitute an application for amendment to the technical specifications (T/Ss) for Donald C. Cook Nuclear Plant Units 1 and 2. Specifically, we are proposing to implement changes to modify surveillance testing for the emergency diesel generators (EDGs) during refueling operations.

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 T/S pages. Attachment 4 provides a technical evaluation report.

In addition, this is a cost beneficial licensing action (CBLA) submittal and represents a high priority item since it will, once approved, result in a significant reduction in operating cost. The lifetime cost saving associated with this CBLA is approximately \$600,000, as detailed in Attachment 5.

We believe that 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.

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These proposed changes have been reviewed by the Plant Nuclear Safety Review Committee and will be reviewed by the Nuclear Safety and Design Review Committee at its next regularly scheduled meeting.

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.

This letter is submitted pursuant to 10 CFR 50.30(b) and, as such, an oath statement is attached.


Sincerely,



E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 15th DAY OF June 1995



Notary Public

My Commission Expires: 6-28-99

cad

Attachments



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U.S. Nuclear Regulatory Commission
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AEP:NRC:0896V

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

ATTACHMENT 1 TO AEP:NRC:0896V

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

A. DESCRIPTION OF CHANGES

The changes proposed by this letter involve the emergency diesel generator (EDG) 18 month 24 hour surveillance test. The changes are described individually as follows:

Emergency Diesel Generator Surveillance Requirements

T/S: 4.8.1.1.2.e.7 (Units 1 and 2)

Page: 3/4 8-6 (Units 1 and 2)

- 1) Reduce the duration of the surveillance test from 24 hours to 8 hours.
- 2) Modify the footnote associated with the asterisk at the end of 4.8.1.1.2.e.7 to reflect the reduction of the surveillance test from 24 hours to 8 hours.

B. JUSTIFICATION FOR CHANGES

The proposed changes involve the 18 month 24 hour EDG surveillance which is implemented by plant procedure. The proposed changes are designed to reduce operating costs, increase outage scheduling flexibility, reduce shutdown risk, and increase diesel life. Reducing the surveillance time from 24 to 8 hours would significantly improve outage performance without reducing EDG reliability. Based on examination of Cook Nuclear Plant test data from 1974 to 1994, it is clear that extensive run times beyond the point where the EDG is started, loaded to 3500KW, and achieves an equilibrium condition provide little insight regarding EDG reliability. The engine steady-state characteristics are achieved in approximately 2 hours and the dominant failure modes of the EDG are expected to occur within this period. In addition, review of the 24-hour test data from 1974 to 1994 does not indicate the discovery of any abnormal conditions that would have jeopardized the diesel from completing its mission during an actual emergency demand. Therefore, as described in Attachment 4, reduction of the test duration from a 24 to an 8 hour period will maintain an equivalent level of confidence in EDG reliability and may actually improve overall EDG reliability.

C. 10 CFR 50.92 CRITERIA

Per 10 CFR 50.92, a proposed change does not involve a significant hazards consideration if the change 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 evaluated, or
3. involve a significant reduction in a margin of safety.

Criterion 1

The safety function of the EDGs is to supply ac electrical power to plant safety systems whenever the preferred ac power supply is unavailable. Through surveillance requirements, the ability of the EDGs to meet their load and timing requirements is tested and the quality of the fuel and the availability of the fuel supply are monitored. Reduction of the 24 hour run to 8 hours will not reduce the surveillance factors under consideration and will sufficiently exercise the EDG and its support systems to identify potential conditions that could lead to performance degradation (See Attachment 4). Based on these considerations, it is concluded that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The proposed changes do not involve physical changes to the plant or changes in plant operating configuration. The changes only involve the reduction of 18 month 24 hour EDG surveillance test duration. Thus, it is concluded that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Criterion 3

Although the duration of the 18 month 24 hour EDG surveillance test would be reduced, the EDG components will continue to be sufficiently exercised such that the ability to detect incipient and degraded conditions will be maintained (See Attachment 4, Figure 2). The proposed changes have been determined to be compatible with our plant operating experience and commensurate with past surveillance test results. Based on these considerations, it is concluded that the proposed changes do not involve a significant reduction in a margin of safety.