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SUBJECT: Application for amends to licenses DPR-58 & DPR-74, changing grammatical correction to wording of Unit 2 TS 3.4.8, Action a for Modes 1, 2 & 3 & returning frequency requirement to TS 4.7.1.2.c & 4.7.1.2.d that was inadvertently deleted.

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March 26, 1997

AEP:NRC:0433P

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
ADMINISTRATIVE CORRECTIONS
TECHNICAL SPECIFICATION CHANGE REQUEST

This letter and its attachments constitute an application for amendment of the technical specifications (T/S) for Cook Nuclear Plant units 1 and 2. Specifically, we are proposing three administrative changes. The first change, "A", involves a grammatical correction to the wording of unit 2 T/S 3.4.8, ACTION a. for MODES 1, 2, and 3. The second change, "B", returns a frequency requirement to T/S 4.7.1.2.c and 4.7.1.2.d that was inadvertently deleted in a prior amendment, and reformats the page to clarify the specified requirements. The third change, "C", deletes a footnote to T/S 3.9.12 as it is no longer applicable.

Attachment 1 to this letter 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.

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 and approved by the Plant Nuclear Safety Review Committee and the Nuclear Safety and Design Review Committee.

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 Michigan Department of Public Health.

Sincerely,

E. E. Fitzpatrick

E. E. Fitzpatrick
Vice President

/jen

Attachments

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 26th DAY OF March, 1997

Janice M. Bickers
Notary Public

Commission Expires: 2001



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PDR ADDCK 05000315
P PDR

JANICE M. BICKERS
Notary Public, Berrien County, MI
My Commission Expires Feb. 16, 2001

ADD 1/1



U. S. Nuclear Regulatory Commission
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AEP:NRC:0433P

cc: A. A. Blind
A. B. Beach
MDEQ - DW & RPD
NRC Resident Inspector
J. R. Padgett

ATTACHMENT 1 TO AEP:NRC:0433P

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

I. DESCRIPTION OF CHANGES

- A. The proposed amendment to technical specification (T/S) 3.4.8, ACTION "a." for MODES 1, 2, and 3 makes the following change to Cook Nuclear Plant unit 2 T/S.

The word "for" is changed to read "or", as noted:

"...during one continuous time interval or exceeding the limit line shown..."

- B. The proposed amendment to T/S 4.7.1.2.c makes the following addition to Cook Nuclear Plant units 1 and 2 T/S.

"By verifying at least once per 31 days that each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in its correct position."

The proposed amendment to T/S 4.7.1.2.d makes the following addition to Cook Nuclear Plant units 1 and 2 T/S.

"By verifying at least once per 31 days that each automatic valve in the flow path is in the fully open position whenever the auxiliary feedwater system is placed in automatic control or when above 10% RATED THERMAL POWER..."

Additionally, for further clarification, the phrase "when tested pursuant to Specification 4.0.5 by" is removed from the initial 4.7.1.2 statement, and added to paragraphs a and b, to which it specifically applies. Paragraph 4.7.1.2.a now reads:

"When tested pursuant to Specification 4.0.5 by verifying that each motor driven auxiliary feed pump's developed head at the test flow point is greater than or equal to the required developed head."

Paragraph 4.7.1.2.b now reads:

"When tested pursuant to Specification 4.0.5 by verifying that the turbine driven auxiliary feedwater pump's developed head when the secondary steam supply pressure is greater than 310 psig. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3."

Paragraphs 4.7.1.2.e through g, have the word "By" inserted at the beginning of the statement.

- C. The proposed amendment to T/S 3.9.12 deletes footnote "+" from Cook Nuclear Plant units 1 and 2 T/S:

+ "This does not include the main load block. For purposes of this specification, a deenergized main load block need not be considered a load."

II. JUSTIFICATION FOR CHANGES

- A. The proposed revision corrects a typographical error. The unit 1 T/S contains the correct wording.
- B. Prior to T/S amendments 164 and 149 to the units 1 and 2 T/Ss, T/S 4.7.1.2 required that each auxiliary feedwater pump be demonstrated operable at least once per 31 days. This included testing of the pumps, and verification of the proper alignment of the automatic and non-automatic valves in the auxiliary feedwater flow path. In a letter dated August 7, 1990, we requested an amendment to T/S 4.7.1.2 to delete the phrase "at least once per 31 days by:" and add the phrase "when tested pursuant to specification 4.0.5 by:". This would then allow quarterly testing of the pumps, which would make the T/S more consistent with ASME code requirements. This request was found to be acceptable in a letter from the NRC dated April 22, 1992, which issued amendments 164 and 149.

In addition to the content changes made via these amendments, the page containing this new information was reformatted. When the page was reformatted, the requirement to verify the position of the automatic and non-automatic valves at least once every 31 days was inadvertently deleted. As currently written, T/S 4.7.1.2.c and 4.7.1.2.d do not specify a frequency requirement. Additionally, as reformatted, it was not clear the phrase "when tested pursuant to Specification 4.0.5 by" was applicable to all paragraphs listed, not just a. and b.

In spite of the fact there is no frequency specified in T/S 4.7.1.2.c and d, the automatic and non-automatic valve verifications have continued to be performed on a 31-day frequency.

- C. T/S 3.9.7 prohibits loads in excess of 2500 pounds from being carried over fuel assemblies in the spent fuel pool, and T/S 3.9.12 prohibits crane operation with loads over the spent fuel pool with no fuel storage pool exhaust ventilation system operable. A previous footnote to T/S 3.9.7 was added, via amendments 93/79, to allow for movement of the main load block over the spent fuel pool while a load drop analysis was being performed. It was deleted, via amendments 113/96, when the load drop analysis was accepted by the NRC. A footnote to T/S 3.9.12 was added, via amendments 124/111, to ensure consistency between 3.9.7 and 3.9.12. Because of overlapping amendments, the footnote added to T/S 3.9.12 was not deleted along with the T/S 3.9.7 footnote.

Subsequently, as part of the steam generator repair project in 1988, both the east and west auxiliary building cranes were designed under the provisions of NUREG-0554 to be single-failure-proof. NUREG-0612 section 5.1.2 exempts a single-failure-proof crane from the requirements of a load drop analysis. The main load blocks on the auxiliary building cranes, and the auxiliary hoist load block on the east crane, are now single-failure-proof blocks. As such, the load blocks are not considered to be heavy loads under the definitions of NUREG-0612, and may be carried over the spent fuel pool, unloaded (as stated in the UFSAR). This footnote is, therefore, no longer applicable.

III. 10 CFR 50.92 CRITERIA

Per 10 CFR 50.92, proposed changes do not involve a significant hazards consideration if the changes do not:

1. involve a significant increase in the probability of 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

This amendment request does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed changes to the T/S do not affect the assumptions, parameters, or results of any UFSAR accident analysis. The first proposed change, "A", is a grammatical correction; the second proposed change, "B", reformats the page, and returns a frequency requirement that, while inadvertently deleted from T/S, was still met via procedure; the third proposed change deletes a footnote which is no longer applicable. As described in section II.C. above, a load drop analysis is not required for single-failure-proof load blocks.

Criterion 2

The proposed changes do not involve physical changes to the plant or changes in plant operating configuration. The changes described above are essentially administrative in nature, and thus do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Criterion 3

The proposed changes are essentially administrative in nature. Per NUREG-0612, single-failure-proof cranes are exempt from the requirements of a load drop analysis; therefore, there is no significant reduction in the margin of safety.

ATTACHMENT 2 TO AEP:NRC:0433P

CURRENT TECHNICAL SPECIFICATION PAGES
MARKED-UP WITH PROPOSED CHANGES