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SUBJECT: Application for amends to licenses DPR-54 & DPR-78, changing
 implementation date to reduce boric acid concentration in
 boric acid storage sys. Attachment 1 to ltr contains
 description of proposed change & justification for change.

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June 10, 1998

AEP:NRC:1232F

Docket Nos.: 50-315
50-316

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Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
LICENSE AMENDMENT CHANGE REQUEST:
BORIC ACID STORAGE SYSTEM BORON CONCENTRATION REDUCTION

This letter and its attachments constitute an application for amendment to the Cook Nuclear Plant unit 1 and 2 facility operating licenses. This amendment change request supercedes our previous request regarding this topic, which was provided in our letter AEP:NRC:1232E, dated April 28, 1998. Per discussion with the NRC staff, this request is now being submitted in the form of a license amendment. Additionally, we have modified the implementation date requested in our April 28, 1998, letter, from December 31, 1999, to December 31, 2000. This change is necessary due to increased activities associated with our present extended outage. The proposed change will change the implementation date to reduce the boric acid concentration in the boric acid storage system.

Attachment 1 to this letter contains a description of the proposed change, justification for the change, and analysis concerning significant hazards consideration pursuant to 10 CFR 50.92. Attachment 2 contains the existing license amendment pages marked to reflect proposed changes.


Because of outage related activities, the required system modifications will not be completed by August 31, 1998. Therefore, it will not be possible to implement the T/S amendments by that date. We request that the implementation date be extended to December 31, 2000. Because of the proximity of the present implementation date, we ask that this license amendment receive an expedited review.

This proposed change to the facility operating license for each unit has been reviewed and approved by the plant nuclear safety review committee and will be reviewed by the nuclear safety and design review committee at the next regularly scheduled meeting.

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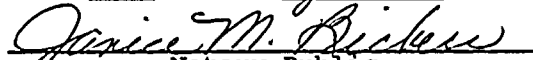
In compliance with the requirements of 10 CFR 50.91(b)(1), copies of this letter and its attachments have been transmitted to the Michigan Public Service Commission and the Michigan Department of Public Health.

Sincerely,


J. R. Sampson
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 10 DAY OF June, 1998


Notary Public

My Commission Expires 2/16/2001

/vlb

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

Attachment

c: J. A. Abramson
MDEQ - DW & RPD
NRC Resident Inspector
C. J. Papereillo

ATTACHMENT 1 TO AEP:NRC:1232F

DESCRIPTION OF PROPOSED LICENSE AMENDMENT CHANGE AND
10 CFR 50.92 SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

DESCRIPTION OF CHANGE IN LICENSE AMENDMENTS (BOTH UNITS)

This license amendment is effective as of the date of issuance, with full implementation when the required plant modifications are completed, but no later than December 31, 2000.

REASON FOR CHANGE

Because of outage related activities, the required system modifications will not be completed by August 31, 1998. Therefore, it will not be possible to implement the technical specification (T/S) amendments by that date.

JUSTIFICATION FOR CHANGE

The approved amendment request allows a reduction in required boric acid concentration, which, in effect, constitutes a relaxation of requirements. During the period of the implementation, the existing approved T/Ss will be maintained.

10 CFR 50.92 SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

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

- involve a significant increase in the probability or consequences of an accident previously evaluated;
- create the possibility of a new or different kind of accident from any accident previously evaluated; or
- involve a significant reduction in a margin of safety.

CRITERION 1

Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. Because the existing, approved T/Ss will be maintained, there is no resultant significant increase in the probability or consequences of an accident previously evaluated.

CRITERION 2

Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. Because the existing, approved T/Ss, will be maintained, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

CRITERION 3

Does the change involve a significant reduction in a margin of safety?

No. The margin of safety requirements are not affected by maintaining the existing, approved T/Ss.

CONCLUSION

It is concluded that operation of Cook Nuclear Plant units 1 and 2 with an implementation date of December 31, 2000, to reduce the boric acid concentration in the boric acid storage system, as described herein, does not involve any significant hazards consideration as defined in 10 CFR 50.92.

ATTACHMENT 2 TO AEP:NRC:1232F

EXISTING LICENSE AMENDMENT PAGES
MARKED TO REFLECT PROPOSED CHANGES