

ACCESSION NBR: 86052302 DOC. DATE: 86/05/19 NOT RIZED: 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  
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 ALEXICH, M. P. Indiana & Michigan Electric Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Application to amend Licenses DPR-58 & DPR-74, changing Tech  
 Spec per NUREG-0737, Requirement II.F.1.5 re containment  
 level monitor, in response to Generic Ltr 83-37 concerning  
 water level instrumentation. Fee paid.

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# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

May 19, 1986  
AEP:NRC:0856I

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
NUREG-0737, TECHNICAL SPECIFICATION CHANGES (GENERIC LETTER NO. 83-37)  
CONTAINMENT WATER LEVEL INSTRUMENTATION

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Denton:

In response to the request in Generic Letter 83-37, this letter and its attachments transmit proposed Technical Specification (T/S) change requests principally associated with NUREG-0737 requirement II.F.1.5. Requests for minor editorial changes to T/Ss 3.4.6.1 and 4.4.6.1 are also described in the attachments. This letter supersedes the portion titled "Containment Water Level Monitor" of our previous submittal AEP:NRC:0856A, dated July 19, 1984. This T/S change was previously scheduled for transmittal to you on December 1, 1985 (ref. our letter AEP:NRC:0856P, dated September 16, 1985), but as discussed with your staff, it was delayed until now to provide us the opportunity to meet and discuss these issues with your staff. Such a discussion was held on January 13, 1986, and the T/Ss contained in this letter reflect the comments we received from your staff.

Attachment 1 to this letter contains the reasons for the proposed changes and the evaluation required under 10 CFR 50.92. Attachment 2 contains the proposed Technical Specification pages. These changes affect T/S pages for which we have also requested changes in our letter AEP:NRC:0856J, dated October 11, 1985. These proposed changes are in addition to those requested in our previous submittal and do not supersede those changes.

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 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 (PNSRC) and will be reviewed by the Nuclear Safety and Design Review Committee (NSDRC) at their next 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 Mr. R. C. Callen of the Michigan Public Service Commission and Mr. G. Bruchmann of the Michigan Department of Public Health.

Pursuant to 10 CFR 170.12(c), we have enclosed an application fee of \$150.00 for the proposed amendments.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

  
M. P. Alexich

Vice President

RBK  
5/19/86

cm

Attachments

cc: John E. Dolan  
W. G. Smith, Jr. - Bridgman  
R. C. Callen  
G. Charnoff  
G. Bruchmann  
NRC Resident Inspector - Bridgman

bc: J. G. Feinstein/P. E. Infanger/W. E. Harvey  
S. H. Horowitz/T. O. Argenta/R. C. Carruth  
J. J. Markowsky/S. H. Steinhart/J. A. Kobyra  
R. W. Jurgensen  
R. F. Kroeger  
M. L. Horvath - Bridgman  
J. F. Stietzel - Bridgman  
F. S. VanPelt, Jr.  
J. B. Shinnock  
D. Wigginton, NRC - Washington, D.C.  
AEP:NRC:0856I  
DC-N-6500.1

ATTACHMENT NO. 1 TO AEP:NRC:0856I

DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2  
REASONS AND 10 CFR 50.92 ANALYSIS FOR PROPOSED  
TECHNICAL SPECIFICATION CHANGES

Containment Water Level Monitor (II.F.1.5)

The guidance given in Generic Letter no. 83-37 states that:

"A continuous indication of containment water level should be provided in the control room of each reactor during Power Operation, Startup and Hot Standby modes of operation. At least one channel for narrow range and two channels for wide range instruments should be operable at all times when the reactor is operating in any of the above modes. Narrow range instruments should cover the range from bottom to the top of the containment sump. Wide range instruments should cover the range from the bottom of the containment to the elevation equivalent to a 600,000 gallon (or less if justified) capacity.

"Technical Specifications for containment water level monitors should be included with other accident monitoring instrumentation in the present Technical Specifications. LCOs (including the required Actions) for wide range monitors should be similar to other accident monitoring instrumentation included in the present Technical specifications. LCOs for narrow range monitor should include the requirement that the inoperable channel will be restored to operable status within 30 days or the plant will be brought to Hot Shutdown condition as required for other accident monitoring instrumentation. Typical acceptable LCO and surveillance requirements for accident monitoring instrumentation are included in Enclosure 3."

We are proposing that T/S Tables 3.3-11 and 3.3-10 for Units 1 and 2, respectively, be revised to include the requirement that at least two containment water level channels and one containment sump level channel be operable during Modes 1, 2, and 3. In addition, we are proposing that T/S Tables 4.3-7 and 4.3-10 for Units 1 and 2, respectively, be revised to include the surveillance requirements for these channels.

In order to follow the above guidance, and maintain internal consistency with our current Technical Specifications, the 30-day action statement in T/S 3.3.3.8 for Unit 1 and 3.3.3.6 for Unit 2 is proposed for the containment water level instrumentation.

Due to the number of backup systems (humidity monitors, sump pump run time, containment atmosphere particulate radioactivity monitoring channels, containment atmosphere gaseous radioactivity monitoring channels, the containment water level instrumentation, and Refueling Water Storage Tank water level), the containment sump level Action Statement proposed in T/S Table 3.3-11 for Unit 1 and Table 3.3-10 for Unit 2 does not require plant shutdown if both channels become inoperable. The action statement requires a special report outlining available backup equipment, the cause of the inoperability, and the plans and schedule for restoring the system to operable status. A statement was added to T/S 3.3.3.8 for Unit 1 and 3.3.3.6 for Unit 2 to indicate the exception to the 30 day action statement.

The format of T/S Tables 3.3-11 and 3.3-10 for Units 1 and 2 varies from the Generic Letter example because our present T/Ss include only one column listing "Minimum Channels Operable." In order to keep the format similar to

other accident monitoring instrumentation included in the present T/Ss, the column listing the "Required No. of Channels" is not included.

We are proposing to add a statement to the Bases portion of the T/Ss, sections 3/4.3.3.8 for Unit 1 and 3/4.3.3.6 for Unit 2, to define a channel check for the containment water level and containment sump level instrumentation. This statement, which is included in Attachment 2, is intended to clarify the requirements of channel checks on this instrumentation.

Per 10 CFR 50.92, 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 evaluated,
- (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

These changes will expand, the license requirements for post-accident monitoring instrumentation and assist the operator in recovering from an accident. The changes will not involve a significant increase in the probability or consequences of any previously evaluated accident.

#### Criterion 2

The changes do not effect normal or accident plant operation. In an accident they only provide data to the operator; therefore, the changes will not create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

#### Criterion 3

The change does not involve a significant reduction in the margin of safety, since it will only require that additional data be available to the operator.

The Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The second of these examples refers to changes that impose additional limitations, restrictions, or controls not presently included in the T/Ss. Since the requirement for sump and containment water level monitors constitute a restriction which the current T/Ss do not have, we believe this example is applicable and that the changes involve no significant hazards consideration.

In order to maintain consistency within the Technical Specifications and eliminate repetition, we are proposing that the requirement for a "containment sump level and flow monitoring system" in T/S 3.4.6.1 be changed to a "containment sump flow monitoring system" as shown in Attachment 2.



In addition, one editorial change was made to eliminate a duplication in the T/Ss. Page 3/4 4-15 of the Unit 1 T/Ss has been left blank to avoid confusion because it is presently identical to Section 4.4.6.1 on Page 3/4 4-14.

These changes are administrative in nature and therefore do not reduce the margin of safety, do not increase the probability or consequences of a previously analyzed accident, and do not introduce the possibility of a new accident. Therefore, we believe that these changes do not involve a significant hazards consideration as defined by 10 CFR 50.92

All of the above T/S changes constitute additional restrictions to the present T/Ss. Therefore, we believe that these changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.