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 ALEXICH, M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION
 COOK, D.C. Document Control Branch (Document Control Desk) *586 T.S.*

SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, proposed deletion of footnotes for surveillance interval extensions.

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AEP:NRC:1072
10 CFR 50.90

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
DELETION OF FOOTNOTES FOR SURVEILLANCE
INTERVAL EXTENSIONS

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

Attn: T. E. Murley

September 15, 1988

Dear Dr. Murley:

The letter constitutes an application for amendment to the Technical Specifications (T/Ss) for the Donald C. Cook Nuclear Plant Units 1 and 2. Pursuant to a request by your staff on July 28, 1988, we are proposing to delete references throughout the T/Ss which indicate that extension of the indicated surveillance interval has been granted by the NRC. The change is administrative in nature, intended only to streamline the T/S document.

The reasons for the proposed change and our analyses concerning significant hazards considerations are contained in Attachment 1 to this letter. The proposed revised T/S pages are contained in Attachment 2.

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 amount of any effluents that may be released offsite, or (2) a significant increase in individual or cumulative occupational radiation exposure.

These changes have been reviewed by the Plant Nuclear Safety Review Committee and will be reviewed by the Nuclear Safety and Design Review Committee at their 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 Mr. R. C. Callen of the Michigan Public Service Commission and Mr. G. Bruchmann of the Michigan Department of Public Health.

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PDR ADCK 05000315
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Pursuant to 10 CFR 170.12 (c), we have enclosed an application fee of \$150.00 for the proposed amendments.

Some of the T/S pages affected by this submittal are pages for which changes are pending due to prior submittals. The proposed changes contained in this submittal are in addition to our previous requests and do not supersede them. Changes pending from two previous submittals, AEP:NRC:0916W (March 26, 1987) and AEP:NRC:0967L (August 9, 1988) are included in the proposed revised T/S pages, as discussed in detail in Attachment 1. Other pages for which changes are pending are listed in the table below.

<u>Letter No.</u>	<u>Date</u>	<u>T/S Page No.</u>
AEP:NRC:0914C	February 28, 1986	Unit 1: 3/4 6-13 Unit 2: 3/4 6-12
AEP:NRC:0896B	January 16, 1987	Unit 1: 3/4 8-12 Unit 2: 3/4 8-2 3/4 8-8 3/4 8-11
AEP:NRC:0959	May 28, 1987	Unit 1: 3/4 7-25 Unit 2: 3/4 7-19a
AEP:NRC:0896H	November 25, 1987	Unit 1: 3/4 8-3 3/4 8-5 Unit 2: 3/4 8-3 3/4 8-5
AEP:NRC:0896J	April 29, 1988	Unit 1: 3/4 8-9 3/4 8-14
AEP:NRC:0692BJ	June 16, 1988	Unit 1: 3/4 3-48 3/4 7-6 3/4 7-15 3/4 7-17 Unit 2: 3/4 7-6 3/4 7-12 3/4 7-13

Dr. T. E. Murley

-3-

AEP:NRC:1072

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

Sincerely,


M. P. Alexigh
Vice President

MPA/ldp

Attachments

cc: D. H. Williams, Jr.
W. G. Smith, Jr. - Bridgman
G. Bruchmann
R. C. Callen
G. Charnoff
NRC Resident Inspector - Bridgman
A. B. Davis - Region III

Attachment 1 to AEP:NRC:1072

Reasons and 10 CFR 50.92 Significant Hazards Evaluation
for Changes to the Technical Specifications for the
Donald C. Cook Nuclear Plant Units 1 and 2

.8809230204

Introduction

This letter requests deletion of numerous footnotes which have been placed in the Technical Specifications (T/Ss) to indicate that extension of the T/S surveillance interval has been granted by the NRC. The extensions were granted at various times so that the units could continue power operation until their refueling outages without the need to shut down prior to the outage for T/S required surveillance testing.

Past practice with regards to surveillance interval extensions has been to provide a new T/S in Section 4.0 which indicates that extensions have been granted for certain surveillances until the upcoming refueling outage. Footnotes are placed on the individual surveillance requirements indicating that the provisions of the new Section 4.0 T/S are applicable. Unit 1 T/S 4.0.6 is typical of the Section 4.0 T/Ss which involve surveillance interval extensions.

During a meeting held with your staff on July 28, 1988, we were requested to streamline with T/S documents by proposing deletion of the numerous footnotes which have been placed in the T/Ss because of surveillance interval extensions.

The surveillance interval extensions which have been previously granted did not simply extend the surveillance interval on a one-time basis. The extensions also allowed the initiation date for the requirements of T/S 4.0.2 to be established by the date the surveillance was performed during the refueling outage. Although T/S 4.0.2 allows a 25% grace period for the surveillance interval, T/S 4.0.2 limits this grace period to 25% of the interval over three consecutive intervals. The surveillance interval extensions allowed us to neglect past surveillances, and to begin counting the three consecutive intervals discussed in T/S 4.0.2.b with the surveillance performed during the outage. Had this provision not been incorporated into the surveillance interval extension, the 3.25 requirement of T/S 4.0.2.b would have required the next surveillance to be performed sooner than required by even the nominal T/S interval, which would have meant a premature unit shutdown or the need for an additional surveillance interval extension. Because this "rezeroing" provision is incorporated into the Section 4.0 T/Ss which were added for surveillance interval extensions, we have chosen not to eliminate the Section 4.0 T/Ss along with the footnotes. Instead, we have proposed to modify those T/Ss such that they reference amendment(s) which granted the surveillance interval extensions. This approach streamlines the individual T/S surveillance requirements by removing the numerous footnotes which have been added, but also retains reference in the T/S to the fact that "rezeroing" for certain surveillances has been granted by the NRC. Incorporation of the T/S amendment number into the Section 4.0 T/Ss will provide a reference as to which

surveillances were granted extensions (and thus can be "rezeroed"), which will facilitate administrative control of surveillance due date tracking.

10 CFR 50.92 Evaluation

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 analyzed,
- (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.

Our evaluation of the proposed change with respect to these criteria is provided below.

Criterion 1

The change is administrative in nature. No requirements of the present T/Ss are eliminated or reduced. The change is intended only to streamline the T/Ss by eliminating numerous footnotes which tend to clutter the document. As such, the change is not expected to involve a significant increase in the probability or consequences of a previously analyzed accident, nor should it involve a significant reduction in a margin of safety.

Criterion 2

The change will not result in a change in plant configuration or operation. Therefore, this change is not expected to create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

See Criterion 1 above.

Lastly, we note that 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 first of these refers to changes which are purely administrative in nature. For the reasons cited above, we believe this example is applicable and that the change does not involve significant hazards consideration.

Additional Editorial Change

The footnotes for Table 4.3-7 for Unit 1 and Table 4.3-10 for Unit 2 stating that Amendment 112 (Unit 1) is effective before startup after the scheduled August 1989 outage and Amendment 95 (Unit 2) is effective before startup after the scheduled 1989 outage are redundant to the Bases. For this reason, we are proposing to delete them. This is an editorial change to eliminate redundancy within the T/Ss, and we therefore conclude that this change does not constitute a significant hazard as defined in 10 CFR 50.92.

Description of Changes

The table below provides a summary of the footnotes which we are proposing to delete. The table lists the T/S page, T/S number, and the footnote deleted (4.0.6 or 4.0.7). Some of the pages involved have other changes pending from our submittal AEP:NRC:0916W, dated March 26, 1987. During discussions on August 25, 1988, your staff indicated the changes proposed in AEP:NRC:0916W were expected to be granted in the near future. Therefore, we have included these pending changes in our present submittal. The summary table, below, indicates which pages are affected by the AEP:NRC:0916W pending changes.

Table 2: Description of Deleted Footnotes

<u>Unit</u>	<u>Page</u>	<u>T/S</u>	<u>Footnote Deleted</u>	<u>Affected by AEP:NRC: 0916W</u>
1	3/4 3-1	4.3.1.1.3	4.0.6	No
	3/4 3-12	Functional Units 7-11	4.0.6	Yes
	3/4 3-13	Functional Units 14, 15	4.0.6	Yes
	3/4 3-15	4.3.2.1.2 4.3.2.1.3	4.0.6 4.0.6	No
	3/4 3-31	Functional Units 1.c-1.f, 2.c	4.0.6	Yes
	3/4 3-32	Functional Unit 3.b.3	4.0.6	No
	3/4 3-33	Functional Units 4.c, 4.d, 5.a, 6.a, 6.b, 6.d	4.0.6	Yes

Table 2: Description of Deleted Footnotes (cont.)

<u>Unit</u>	<u>Page</u>	<u>T/S</u>	<u>Footnote Deleted</u>	<u>Affected by AEP:NRC: 0916W</u>
1	3/4 3-33a	Functional Units 7.a, 8.a, 8.b	4.0.6	Yes
	3/4 3-42	Functional Units 1.a.1, 1.a.2	4.0.6	No
	3/4 3-48	Functional Units 2, 3, and 5	4.0.6	No
	3/4 3-56	Functional Units 1, 5-7, 12-14	4.0.6	No
	3/4 4-14	4.4.6.1.b	4.0.6	No
	3/4 4-35	4.4.11.1.b	4.0.6	Yes (The AEP:NRC:0916W page is 3/4 4-36)
	3/4 4-36	4.4.11.3	4.0.6	Yes
	3/4 5-2	4.5.1.d	4.0.6	No
	3/4 5-5	4.5.2.d 4.5.2.e	4.0.6 4.0.6	No
	3/4 5-8	4.5.3.1	4.0.6	No
	3/4 6-10	4.6.2.1.c	4.0.6	No
	3/4 6-13	4.6.2.2.c.2	4.0.6	No
	3/4 6-15	4.6.3.1.2	4.0.6	No
	3/4 6-27	4.6.5.1.b.2 4.6.5.1.b.3	4.0.6	No
	3/4 6-30	4.6.5.3.1.b	4.0.6	No
	3/4 6-33	4.6.5.4.b 4.6.5.4.c	4.0.6	No
	3/4 6-34	4.6.5.5.2.b	4.0.6	No

Table 2: Description of Deleted Footnotes (cont.)

<u>Unit</u>	<u>Page</u>	<u>T/S</u>	<u>Footnote Deleted</u>	<u>Affected by AEP:NRG: 0916W</u>
1	3/4 6-38	4.6.5.9	4.0.6	No
	3/4 7-6	4.7.1.2.b	4.0.6	No
	3/4 7-15	4.7.3.1.b	4.0.6	No
	3/4 7-17	4.7.4.1.b	4.0.6	No
	3/4 7-22	4.7.5.1.e.2	4.0.6	No
	3/4 7-25	4.7.6.1.d.3	4.0.6	No
	3/4 7-28	4.7.8	4.0.6	No
	3/4 7-45	4.7.9.2.b	4.0.6	No
	3/4 8-3	4.8.1.1.2.b	4.0.6	No
	3/4 8-5	4.8.1.2	4.0.6	Yes
	3/4 8-9	4.8.2.3.2.d	4.0.6	No
	3/4 8-12	4.8.2.4.2	4.0.6	No
	3/4 8-14	4.8.2.5.2.d	4.0.6	No
2	3/4 1-22	4.1.3.3	4.0.7	No
	3/4 3-1	4.3.1.1.1	4.0.6	No
		4.3.1.1.2	4.0.6	
		4.3.1.1.3	4.0.7	
	3/4 3-14	4.3.2.1.1	4.0.6	No
		4.3.2.1.2	4.0.6	
		4.3.2.1.3	4.0.7	
	3/4 3-32	Functional Unit 6.d	4.0.7	No
	3/4 3-47	Functional Unit 16	4.0.7	No
	3/4 4-14	4.4.6.1.b	4.0.6	No

Table 2: Description of Deleted Footnotes (cont.)

<u>Unit</u>	<u>Page</u>	<u>T/S</u>	<u>Footnote Deleted</u>	<u>Affected by AEP:NRC: 0916W</u>
2	3/4 4-33	4.4.11.3	4.0.7	No
	3/4 5-2	4.5.1.d	4.0.7	No
	3/4 5-4	4.5.2	4.0.6	No
	3/4 5-5	4.5.2.d.1 4.5.2.e	4.0.7 4.0.7	No
	3/4 5-8	4.5.3.1	4.0.6 & 4.0.7	No
	3/4 6-10	4.6.2.1.c	4.0.7	No
	3/4 6-12	4.6.2.2.c	4.0.7	No
	3/4 6-14	4.6.3.1.2	4.0.7	No
	3/4 6-47	4.6.5.9	4.0.6	No
	3/4 7-6	4.7.1.2.b	4.0.7	No
	3/4 7-12	4.7.3.1.b	4.0.7	No
	3/4 7-13	4.7.4.1.b	4.0.7	No
	3/4 7-16a	4.7.5.1.e.2	4.0.7	No
	3/4 7-19a	4.7.6.1.d.3	4.0.7	No
	3/4 7-20	4.7.7.1	4.0.6	No
	3/4 7-21	4.7.7.1.c	4.0.7	No
	3/4 7-40	4.7.9.2.b	4.0.6	No
	3/4 8-2	4.8.1.1.1 4.8.1.1.2	4.0.6	No
	3/4 8-3	4.8.1.1.2.c	4.0.7	No
	3/4 8-5	4.8.1.2	4.0.6 & 4.0.7	Yes
	3/4 8-8	4.8.2.3.2	4.0.6	No

Table 2: Description of Deleted Footnotes (cont.)

<u>Unit</u>	<u>Page</u>	<u>T/S</u>	<u>Footnote Deleted</u>	<u>Affected by AEP:NRC: 0916W</u>
2	3/4 8-11	4.8.2.4.2	4.0.6	No
	3/4 9-4	4.9.4.b	4.0.7	No

Surveillance interval extensions are pending from our submittal AEP:NRC:0967L dated August 9, 1988. This submittal proposed extensions to allow Unit 1 Cycle 10 to continue uninterrupted into the Cycle 10-11 refueling outage, currently projected to begin by March 1989. Attachment 3 to this letter provides revised pages from AEP:NRC:0967L with the proposed T/S 4.0.7 footnotes deleted. The T/S 4.0.7 which was proposed in AEP:NRC:0967L has also been modified such that it is of the same format as the other Section 4.0 surveillance interval extension T/Ss. Since the changes have not yet been granted, the amendment number in the new T/S 4.0.7 has been left blank.

The Unit 1 T/S pages and T/S numbers affected by the AEP:NRC:0967L submittal are provided in Table 3 below. Some of the pages involved with the AEP:NRC:0967L submittal already have footnotes referring to earlier surveillance interval extensions, and thus are also included in Attachment 2 to this letter. The pages in Attachment 3, however, have margin bars which also indicate the changes from the AEP:NRC:0967L submittal. Table 2 indicates which pages are also included in Attachment 2.

Table 3: Changes for AEP:NRC:0967L

<u>Page</u>	<u>T/S</u>	<u>Included in Attachment 2</u>
3/4 0-3	4.0.7	Yes
3/4 3-1	4.3.1.1.1	Yes
3/4 3-12	Functional Units 7 and 8	Yes
3/4 3-15	4.3.2.1.1 4.3.2.1.2	Yes
3/4 3-31	Functional Unit 1.f	Yes



Table 3: Changes for AEP:NRC:0967L (cont)

<u>Page</u>	<u>T/S</u>	<u>Included in Attachment 2</u>
3/4 3-33	Functional Unit 4.d	Yes
3/4 3-54	4.3.3.8	No
3/4 3-56	Functional Units 2, 3 and 11	Yes
3/4 6-27	4.6.5.1.b.2 4.6.5.1.b.3	Yes
3/4 6-30	4.6.5.3.1.b	Yes
3/4 6-33	4.6.5.4.c	Yes

The proposed changes of this submittal would require removing the pages identified below and inserting the revised pages included in Attachment 2. This list assumes that the changes of AEP:NRC:0916W are approved prior to the changes of this letter.

UNIT 1

<u>Remove</u>	<u>Insert</u>
3/4 0-3	3/4 0-3
3/4 3-1	3/4 3-1
3/4 3-12	3/4 3-12
3/4 3-13	3/4 3-13
3/4 3-15	3/4 3-15
3/4 3-31	3/4 3-31
3/4 3-32	3/4 3-32
3/4 3-33	3/4 3-33
3/4 3-33a	3/4 3-33a
3/4 3-42	3/4 3-42
3/4 3-48	3/4 3-48

UNIT 1 (cont)

<u>Remove</u>	<u>Insert</u>
3/4 3-56	3/4 3-56
3/4 4-14	3/4 4-14
3/4 4-36	3/4 4-36
3/4 5-2	3/4 5-2
3/4 5-5	3/4 5-5
3/4 5-8	3/4 5-8
3/4 6-10	3/4 6-10
3/4 6-13	3/4 6-13
3/4 6-15	3/4 6-15
3/4 6-27	3/4 6-27
3/4 6-30	3/4 6-30
3/4 6-33	3/4 6-33
3/4 6-34	3/4 6-34
3/4 6-38	3/4 6-38
3/4 7-6	3/4 7-6
3/4 7-15	3/4 7-15
3/4 7-17	3/4 7-17
3/4 7-22	3/4 7-22
3/4 7-25	3/4 7-25
3/4 7-28	3/4 7-28
3/4 7-45	3/4 7-45
3/4 8-3	3/4 8-3
3/4 8-5	3/4 8-5
3/4 8-9	3/4 8-9

UNIT 1 (cont)Remove

3/4 8-12

3/4 8-14

Insert

3/4 8-12

3/4 8-14

UNIT 2Remove

3/4 1-22

3/4 3-1

3/4 3-14

3/4 3-32

3/4 3-47

3/4 4-14

3/4 4-23

3/4 5-2

3/4 5-4

3/4 5-5

3/4 5-8

3/4 6-10

3/4 6-12

3/4 6-14

3/4 6-47

3/4 7-6

3/4 7-12

3/4 7-13

3/4 7-16a

Insert

3/4 1-22

3/4 3-1

3/4 3-14

3/4 3-32

3/4 3-47

3/4 4-14

3/4 4-23

3/4 5-2

3/4 5-4

3/4 5-5

3/4 5-8

3/4 6-10

3/4 6-12

3/4 6-14

3/4 6-47

3/4 7-6

3/4 7-12

3/4 7-13

3/4 7-16a

UNIT 2 (cont)Remove

3/4 7-19a

3/4 7-20

3/4 7-21

3/4 7-40

3/4 8-2

3/4 8-3

3/4 8-5

3/4 8-8

3/4 8-11

3/4 9-4

Insert

3/4 7-19a

3/4 7-20

3/4 7-21

3/4 7-40

3/4 8-2

3/4 8-3

3/4 8-5

3/4 8-8

3/4 8-11

3/4 9-4

Attachment 2 to AEP:NRC:1072

Proposed Revised Technical Specification Pages