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 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316

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SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, allowing
 posting of individuals to substitute for locked doors.

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AEP:NRG:1039

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
T/S CHANGE REQUEST ON LOCKING OF
HIGH RADIATION AREAS

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

Attn: T. E. Murley

March 14, 1989

Dear Dr. Murley:

This letter constitutes an application for amendment to the Technical Specifications (T/Ss) for the Donald C. Cook Nuclear Plant Units 1 and 2. Specifically, we are proposing to allow the posting of designated individuals to substitute for the locked doors for high radiation areas required by T/S 6.12.2. A detailed description of the proposed change and our analysis concerning significant hazards considerations are contained in Attachment 1. The proposed revised T/S pages are contained in Attachment 2.

We believe that the proposed change will not result in (1) a significant change in the types of effluents or a significant increase in the amount 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 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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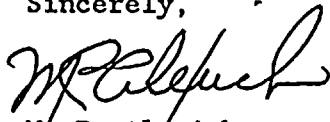
Dr. T. E. Murley

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AEP:NRC:1039

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

Sincerely,



M. P. Alexich
Vice President

CEM/eh

Attachments

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

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ATTACHMENT 1 TO AEP:NRG:1039
REASONS AND 10 CFR 50.92 ANALYSIS FOR
CHANGES TO THE
DONALD C. COOK NUCLEAR PLANT UNIT NO. 1 AND UNIT NO. 2
TECHNICAL SPECIFICATIONS

DESCRIPTION OF CHANGE

Technical Specification (T/S) 6.12.2 requires that locked doors be provided to prevent unauthorized entry into high radiation areas in which the intensity of radiation is greater than 1000 mrem/hr. We are proposing to allow the posting of a designated individual to serve as a substitute for a locked door in those instances in which providing a locked door is not possible or not practical due to area size or configuration.

We have noted the concerns raised in NRC Information Notice 88-79, "Misuse of Flashing Lights For High Radiation Area Controls." The majority of the examples of misuse cited in this information notice involved using the flashing lights (1) when constructing a lockable enclosure was a reasonable alternative or (2) when locking an existing enclosure was possible. As noted above, we intend to use the proposed alternative of posting a designated individual only when it is not possible or not practical to provide locked doors.

As explained in the T/Ss, the intent of the locked doors is to prevent unauthorized entry into the subject area. We believe that posting a designated individual provides a level of protection for preventing unauthorized entry that is equivalent to or better than the protection provided by the flashing lights allowed by the current Westinghouse standard T/Ss and the T/Ss of some other nuclear plants.

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

Changing the access control requirements for high radiation areas does not impact any of the previously analyzed accidents. Therefore, we believe that this change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The proposed change does not involve a change in plant configuration or operation and will not place the plant in an unanalyzed condition; therefore, we believe the change will not create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

We believe that posting a designated individual is equivalent to or better than the alternative (flashing lights) allowed by the Westinghouse standard T/Ss and the T/Ss of some other nuclear plants. Based on this and since we believe that the designated individuals will provide adequate protection against unauthorized entry, we believe the change will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14780) of amendments considered not likely to involve significant hazards considerations. We believe the proposed change is less likely than the sixth example in the above guidance to involve a significant hazards consideration. Specifically, we believe the proposed change will not result in an increase in the probability or consequences of a previously analyzed accident or reduce a margin of safety, since we believe that posting a designated individual will provide adequate protection against unauthorized entry for those instances for which providing a locked enclosure is not possible or not practical. Therefore, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.