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SUBJECT: Application for amends to Licenses DPR-58 & DPR-74,
 consisting of miscellaneous administrative changes to Tech
 Specs.

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AEP:NRG:1137

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
MISCELLANEOUS ADMINISTRATIVE
TECHNICAL SPECIFICATION CHANGE REQUESTS

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

Attn: T. E. Murley

February 15, 1991

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 make miscellaneous administrative changes to the T/Ss of both units. A description of the proposed changes, our reasons for the changes, and our analysis concerning significant hazards considerations are included in Attachment 1. The proposed revised T/Ss pages are contained in Attachment 2. Attachment 3 consists of the existing T/Ss pages marked to reflect how they will be impacted by this proposed amendment.

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 and by 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 Mr. J. R. Padgett of the Michigan Public Service Commission and the Michigan Department of Public Health.

Acc 1/1 Add: NRR/DREP/PRPS 4tr Encl 1

Dr. T. E. Murley

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AEP:NRC:1137

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

eh

Attachments

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
NFEM Section Chief
NRC Resident Inspector - Bridgman
A. B. Davis - NRC Region III

ATTACHMENT 1 TO AEP:NRC:1137
REASONS AND 10 CFR 50.92 ANALYSES FOR
CHANGES TO THE
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2
TECHNICAL SPECIFICATIONS



The proposed changes in this Technical Specifications (T/Ss) change request are purely administrative. A description of each proposed change is given below.

1. Add "121" to Section 2.C.2.p of Unit 2 License

This section of the Unit 2 license was deleted by License Amendment 121. However, the new page states only the following:

(p) Deleted by Amendment

Consequently, we request to revise this phrase to read as follows:

(p) Deleted by Amendment 121

2. Correct two spelling mistakes on Unit 2 page 1-7

In T/S 1.29 the word "resine" should be "resin." In T/S 1.32 the word "particulate" should be "particulates."

3. Add "average" to T/S 2.1.1, Units 1 and 2

To make the T/S clearer and more accurate we are proposing to add the word "average" to the Limiting Condition for Operation (LCO). Currently the T/S reads:

The combination of THERMAL POWER, pressurizer pressure, and the highest operating loop coolant temperature (Tavg) shall not exceed the limits shown in Figure 2.1-1 for 4 loop operation.

We are proposing to change it to read as follows:

The combination of THERMAL POWER, pressurizer pressure, and the highest operating loop coolant average temperature (Tavg) shall not exceed the limits shown in Figure 2.1-1 for 4 loop operation.

4. Delete the phrase "RATED THERMAL POWER = 3413 MWT," from Unit 1 page 2-2

As part of the analysis Westinghouse performed to support increased steam generator tube plugging, they provided Figure 2.1-1, which was later issued as part of Amendment 152. To be conservative, Westinghouse assumed a rated thermal power of 3413 MWT, as is stated on T/S page 2-2, Figure 2.1-1. However, since Unit 1 is actually rated for 3250 MWT, this statement appearing in the T/Ss is very confusing. The similar table in the Unit 2 T/Ss does not contain this statement. Consequently, we are proposing to delete this statement from the Unit 1 T/Ss.



5. Reflect proper terminology in Table 2.2-1, Units 1 and 2

We are proposing to change the wording for functional unit 17.A in Table 2.2-1 from "Low Trip System Pressure" to "Low Fluid Oil Pressure." This change is proposed to make the T/S clearer by reflecting proper terminology. In addition, we are changing the orientation of this table from horizontal to vertical.

6. Correct typographical error in Unit 2 T/S 3.2.1 LCO,

The Unit 2 T/S 3.2.1 LCO currently refers to the "target ban." This should be changed to "target band."

7. Correct inconsistency in Unit 1 T/S Table 3.3-5, Item (7)d

T/S 4.6.5.6(a) requires the containment air recirculation fans to automatically start in 9 ± 1 minutes after receiving a high-high containment pressure signal. Table 3.3.5 gives a maximum response time of less than or equal to 660 sec. This should be changed to less than or equal to 600 sec. Unit 2 is already correct. In addition, we are writing out "less than or equal to" throughout this page of the table.

8. Correct discrepancy in Unit 2 T/S Table 3.3-1

In the Unit 2 T/Ss, for item 22 of Table 3.3-1, Actions 1 and 14 are listed such that they refer to Modes 1, 2, 3, 4, and 5. We are revising item 22 such that Action 1 refers to Modes 1 and 2 and Action 14 refers to Modes 3, 4, and 5. This is consistent with Unit 1.

In addition, we are changing the orientation from horizontal to vertical for all three pages of this table.

9. Correct editorial error on Unit 1 page 3/4 3-33

Functional unit 4.d currently reads:

- d. Steam Flow in
Two Steam Lines--
High Coincident with
Tavg--Low-Low
Pressure--Low



This should be broken into two functional units, as is the case for Unit 2. We propose the following:

d. Steam Flow in
Two Steam Lines--
High Coincident with
Tavg--Low-Low

e. Steam Line Pressure--
Low

10. Delete reference to previously deleted T/S in Table 3.3-6, Units 1 and 2

Currently Action 22A-3 and Action 22B-4 in Table 3.3-6 state:

Technical Specification Sections 3.0.3, 3.0.4 and
6.9.1.13 Not Applicable.

However T/S 6.9.1.13 has been deleted by a previous amendment. Consequently, we are requesting to change Action 22A-3 and Action 22B-4 to state:

Technical Specification Sections 3.0.3 and 3.0.4 Not
Applicable.

11. Correct elevation in Unit 1 Table 3.3-10 and Unit 2 Table 3.3-11

Item a under the heading "Auxiliary Building" in Unit 1 Table 3.3-10 incorrectly lists elevation 587. The correct listing for item a is elevation 573. Item d under the heading "Auxiliary Building" in Unit 2 Table 3.3-11 lists elevation 587, when elevation 573 should be listed first (it is the lowest elevation). Therefore, item d has become item a and items a through f are relettered accordingly.

12. Correct terminology in Unit 1 T/S Table 3.3-11 and Unit 2 T/S Table 3.3-10

Item 11 in these tables refers to a footnote that says, "***PRODACC250 subcooling margin readout can be used as a substitute for the subcooling monitor instrumentation." Reference to the "PRODACC 250" is interpreted to be the plant process computer (PPC). The PRODACC 250 computer was replaced by the new PPC. Consequently, we are proposing to revise the subject phrase to read as follows: "PPC subcooling margin readout can be used as a substitute for the subcooling monitor instrument."



In addition, we are deleting the following note from the bottom of the Unit 1 page, since it is no longer applies:

Amendment No. 112 (Effective before startup following the refueling outage currently scheduled in August 1989).

Likewise, this note should be deleted from the Unit 2 page:

Amendment No. 95 (Effective before startup following refueling outage currently scheduled in early 1988).

13. Correct cross reference in T/S 3/4.4.11.3, Units 1 and 2

Amendment 125 to Unit 1 and 112 to Unit 2 added new surveillance requirements and rearranged the order of the surveillances listed in T/S 4.8.11.2. This has resulted in improper cross references being given in T/S 3/4.4.11. For Unit 1, reference to 4.8.1.1.2b is incorrect and should be revised to 4.8.1.1.2e. For Unit 2, reference to 4.8.1.1.2c is incorrect and should be revised to 4.8.1.1.2e.

14. Make T/S 4.5.2 consistent between units and provide clarification (revise Unit 2)

At present, Unit 2 T/S 4.5.2(a) says:

At least once per 12 hours by verifying that the following valves are in the indicated positions with power to the valve operator removed:

This wording implies that the valve motor breaker is to be open. In reality the breaker is closed but control power is removed. The same specification in Unit 1 is worded correctly. Consequently, we are proposing to make Unit 2 read like Unit 1, as follows:

At least once per 12 hours by verifying that the following valves are in the indicated positions with the control power locked out.

15. Delete Unit 1 page 3/4 5-6a

This page should have been deleted by Amendment No. 126. The information on Unit 1 T/S page 3/4 5-6a has been superseded by that on page 3/4 5-6. Consequently, we are requesting that page 3/4 5-6a be deleted.

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16. Make T/S 3/4 6.1.3 consistent between units, Units 1 and 2

To clarify T/S 4.6.1.3.b for both units, we wish to change the partial sentence "After each opening, except when the air lock is being used for multiple entries, when it shall be done at least once per 3 days, by performing . . ." to "Within 72 hours following each closing, perform"

We also propose the following editorial changes:

- o T/S 3.6.1.3(b), both units, write out "less than or equal to"
- o T/S 3.6.1.3(b), Unit 2, change "12.0" to "12"
- o T/S 4.6.1.3(c), Unit 1, replace the word "gap" with "volume"
- o T/S 4.6.1.3(c), Unit 2, delete the commas and insert parentheses around "12 psig."

17. Delete repeated lines on Unit 1 page 3/4 6-15

We are proposing to delete the following lines from the top of page 3/4 6-15 since they appear on the bottom of page 3/4 6-14:

. . . valve or its associated actuator, control or power circuit by performance of the cycling test, above, and verification of isolation time.

18. Change the described function of items in Table 3.6-1 to reflect proper terminology, Units 1 and 2

For valves listed as items D.3 through D.6 in Table 3.6-1 the term "inlet" is used to describe the function of the valve. The terms "inlet" and "outlet" are relative, depending on your frame of reference. At Cook Nuclear Plant we typically use the term "inlet" to refer to the reactor coolant pump inlet. The proper terminology for these valves should be "outlet," since they are at the outlet of the boron injection tank.



Consequently, we are requesting to change the table from:

3. ICM - 250 Boron Injection Inlet
4. ICM - 251 Boron Injection Inlet
5. ICM - 260 Safety Injection Inlet
6. ICM - 265 Safety Injection Inlet

to:

3. ICM - 250 Boron Injection Outlet
4. ICM - 251 Boron Injection Outlet
5. ICM - 260 Safety Injection Outlet
6. ICM - 265 Safety Injection Outlet

In addition, Items D.7 and D.8 contain an incomplete description of the valve's function. In both cases the description currently reads "RHR Suction From Sump." It should read "RHR/CTS Suction From Sump."

19. Provide clarification to 3.7.1.2, Units 1 and 2

Currently T/S 3.7.1.2(a) 1 and 2 read as follows:

1. Two feedwater pumps, each capable of being powered from separate emergency busses,
2. One feedwater pump capable of being powered from an OPERABLE steam supply system.

We wish to revise T/S 3.7.1.2(a) as follows to provide clarification:

1. Two motor-driven auxiliary feedwater pumps, each capable of being powered from separate emergency busses, and
2. One steam turbine-driven auxiliary feedwater pump capable of being powered from an OPERABLE steam supply system.

20. Correct typographical error in T/S 3/4.8.3, Unit 2

Currently the footnote says "Unit 2". This should be changed to say "Unit 1".

21. Delete non applicable T/S surveillance requirement from T/S 4.9.7.1, Units 1 and 2

Currently T/S 4.9.7.1 reads as follows:

Crane interlocks and physical stops which prevent crane travel with loads in excess of 2,500 pounds over fuel



assemblies shall be demonstrated OPERABLE within 7 days prior to crane use and at least once per 7 days thereafter during crane operation.

The requirement to verify both interlocks and physical stops on the auxiliary building crane within seven days prior to crane use whenever fuel is stored in the pit was taken directly from NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," and is not totally applicable to Cook Nuclear Plant. The auxiliary building crane is not equipped with physical stops. As such, this T/S has been interpreted such that verification of the electrical interlocks alone constitutes compliance. Thus, we are proposing to delete this requirement, so that T/S 4.9.7.1 will state:

Crane interlocks which prevent crane travel with loads in excess of 2,500 pounds over fuel assemblies shall be demonstrated OPERABLE within 7 days prior to crane use and at least once per 7 days thereafter during crane operation.

In addition, in the footnote we are changing "D.C. COOK - UNIT" to "Cook Nuclear Plant - Unit".

22. Delete asterisk from T/S 3.9.9, Unit 2

The first line of the action statement of Unit 2 T/S 3.9.9 reads:

With the Containment Purge and Exhaust isolation system* inoperable, . . .

The asterisk after the word "system" was not deleted as part of Amendment No. 63 when the footnote was removed. Consequently, we are proposing to delete the asterisk in this submittal.

23. Capitalize defined term in T/S 5.1.3, Units 1 and 2

Technical Specification 5.1.3 currently reads as follows:

The site boundary for gaseous and liquid effluents shall be shown in Figure 5.1-3

However, the term "site boundary" is defined in T/S 1.3.6. Per T/S 1.1, defined terms should appear in capitalized type and we are therefore proposing to revise T/S 5.1.3 as follows:

The SITE BOUNDARY for gaseous and liquid effluents shall be shown in Figure 5.1-3.



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24. Correct typographical error in Unit 1 T/S 6.5.1.6(a)

We propose to correct the spelling of "proceudres" to "procedures."

25. Correct terminology in T/S 6.4

T/S 6.4 should be revised to reference Subpart "A" of 10 CFR Part 55, not Appendix "A" of 10 CFR Part 55.

Impact on Pending Submittals

Several of the technical specifications that we are proposing to change in this submittal are the subject of submittals pending NRC review and approval. These technical specifications and the submittals that impact them are as follows:

Unit 1

Table 3.3-5	AEP:NRC:1030	03/14/89
Table 4.3-2		
T/S 3/4.7.1.2	AEP:NRC:0433N	08/07/90
T/S 6.5.1.6	AEP:NRC:0659M	08/25/89
T/S 6.4.1		

Unit 2

T/S 3/4.7.1.2	AEP:NRC:0433N	08/07/90
T/S 6.4.1	AEP:NRC:0659M	08/25/89

Analysis of Significant Hazards

Per 10 CFR 50.92, a proposed amendment will involve no significant hazards considerations 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.

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Criterion 1

The proposed changes are purely administrative and are intended to correct errors or problems in the T/Ss. Therefore, we believe these changes do not involve a significant increase in the probability or consequences of a previously analyzed accident.

Criterion 2

Since the proposed changes are purely administrative and introduce no new operating conditions, we believe that these changes will not create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

For the reasons cited in Criterion 1 above, we believe that the proposed changes will not result in a significant reduction in the margin of safety.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples of amendments not likely to involve significant hazards considerations. The first example is that of a purely administrative change to the T/Ss; for example, a change to achieve consistency throughout the T/Ss, correction of an error, or change in nomenclature. We believe that the changes requested in this letter are of the type specified in this example, since they are intended to correct errors and problems in the T/Ss. Therefore, we believe this change involves no significant hazards considerations as defined in 10 CFR 50.92



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