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AUTH. NAME AUTHOR AFFILIATION
FITZPATRICK, E. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
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SUBJECT: Application for amends to licenses DPR-58 & DPR-74, reducing *Change to I*
surveillance requirements for testing during power *Tech Spec*
operation, per Generic Ltr 93-05.

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AEP:NRG:1196

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
LINE ITEM TECHNICAL SPECIFICATIONS IMPROVEMENTS
TO REDUCE SURVEILLANCE REQUIREMENTS FOR TESTING
DURING POWER OPERATION (GENERIC LETTER 93-05)

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

Attn: T. E. Murley

February 22, 1994

Dear Dr. Murley:

This letter and its attachments constitute 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 implement changes that reduce surveillance requirements for testing during power operation, in accordance with Generic Letter 93-05.

Attachment 1 provides a detailed description of the proposed changes, the justification for the changes, and our determination of no significant hazards consideration performed pursuant to 10 CFR 50.92. Attachment 2 contains the existing T/S pages marked to reflect the proposed changes. Attachment 3 contains the proposed T/S pages.

In addition, this is our second Cost Beneficial Licensing Action (CBLA) submittal and represents our highest priority item. The lifetime cost savings associated with this CBLA are approximately \$4,600,000, as detailed in Attachment 4.

We believe the proposed changes will not result in (1) a significant change in the types 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 the Nuclear Safety and Design Review Committee.

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Dr. T. E. Murley

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AEP:NRC:1196

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 to the Michigan Department of Public Health.

This letter is submitted pursuant to 10 CFR 50.30(b) and, as such, an oath statement is attached.

Sincerely,



E. E. Fitzpatrick
Vice President

dr

Attachments

cc: A. A. Blind
G. Charnoff
J. B. Martin - Region III
NFEM Section Chief
NRC Resident Inspector
J. R. Padgett

STATE OF OHIO)
COUNTY OF FRANKLIN)

E. E. Fitzpatrick, being duly sworn, deposes and says that he is the Vice President of licensee Indiana Michigan Power Company, that he has read the foregoing TECHNICAL SPECIFICATION CHANGE REQUEST: LINE ITEM TECHNICAL SPECIFICATIONS IMPROVEMENTS TO REDUCE SURVEILLANCE REQUIREMENTS FOR TESTING DURING POWER OPERATION (GENERIC LETTER 93-05) and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

E. E. Fitzpatrick

Subscribed and sworn to before me this 22nd
day of February, 19 94.

Rita D. Hill
NOTARY PUBLIC

✓ RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-22-94

ATTACHMENT 1 TO AEP:NRC:1196

DESCRIPTION AND JUSTIFICATION OF CHANGES

10 CFR 50.92 ANALYSIS FOR CHANGES
TO THE DONALD C. COOK NUCLEAR PLANT
UNITS 1 AND 2 TECHNICAL SPECIFICATIONS

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A. DESCRIPTION OF CHANGES

The changes proposed by this letter are consistent with those endorsed by the NRC in Generic Letter 93-05, entitled "Line Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation." This generic letter was the result of a comprehensive examination of surveillance requirements in Technical Specifications (T/Ss) that require testing during power operation. This effort was a part of the NRC Technical Specifications Improvement Program. The changes proposed in Generic Letter 93-05 are based on the results of the NRC's study, published as NUREG 1366, "Improvements to Technical Specifications Surveillance Requirements," in December 1992. The changes are described individually as follows:

1. Control Rod Movement Test

Generic Letter Section: 4.2
T/S: 4.1.3.1.2 (Units 1 and 2)
Page: 3/4 1-19 (Units 1 and 2)

The requirement to move full length rods at least eight steps in any one direction is changed from once per 31 days to once per 92 days.

2. Radiation Monitors

Generic Letter Section: 5.14
T/S: Tables 4.3-2 and 4.3-3 (Units 1 and 2)
Page: 3/4 3-32, 3/4 3-38, 3/4 3-38a, 3/4 3-38b (Unit 1) 3/4 3-31, 3/4 3-37, 3/4 3-37a, 3/4 3-37b (Unit 2)

The requirement to perform channel functional testing for radiation monitoring channels is changed from monthly to quarterly.

3. Containment Spray System

Generic Letter Section: 8.1
T/S: 4.6.2.1.d (Units 1 and 2)
Page: 3/4 6-10 (Units 1 and 2)

The requirement to perform an air or smoke test through each spray header to verify the spray nozzles are unobstructed is changed from once per five years to once per ten years. It is noted that the spray nozzles employed at the Cook Nuclear Plant are stainless steel, not carbon steel. Therefore, the

problems experienced at San Onofre Unit 1, discussed in Generic Letter 93-05, are not applicable to the Cook Nuclear Plant.

4. Hydrogen Recombiners

Generic Letter Section: 8.5
T/S: 4.6.4.2.a (Units 1 and 2)
Page: 3/4 6-24 (Unit 1)
3/4 6-34 (Unit 2)

The requirement to perform a recombiner system functional test is changed from once per six months to once per eighteen months.

5. Emergency Diesel Generator Surveillance Requirements

Generic Letter Section: 10.1
T/S: 3.8.1.1 Actions a, b, c, and d; 4.8.1.1.2.e.7 (Units 1 and 2)
Page: 3/4 8-1, 3/4 8-2, 3/4 8-6 (Units 1 and 2)

- 1) The action statements are modified to eliminate requirements to perform diesel generator testing due to inoperability of offsite circuits.
- 2) The action statements are rewritten to explicitly state that testing of the redundant diesel generator is not required if the other diesel generator became inoperable due to an inoperable support system or a component that can be independently tested. Also, testing of the redundant diesel generator is not required if the absence of any potential common mode failure is demonstrated. For action statement b, the time to demonstrate operability of the remaining diesel is conservatively changed from 24 hours to 8 hours.
- 3) Following the 24 hour diesel run required by surveillance requirement 4.8.1.1.2.e.7, the requirement to perform surveillance requirement 4.8.1.1.2.e.4 (simulated loss of offsite power start and load test) is replaced with surveillance requirement 4.8.1.1.2.a.4 (diesel generator start test). Surveillance requirement 4.8.1.1.2.a.4 specifically states that the diesel start is to be performed at ambient (i.e., cold) conditions. Therefore, we have added a note to the proposed revised surveillance requirement 4.8.1.1.2.e.7 stating that the diesel generator start performed within five minutes of

the 24-hour run is conducted at "existing" conditions. Also, a footnote is added indicating that if surveillance requirement 4.8.1.1.2.a.4 is not performed satisfactorily following the 24 hour run, the diesel generator may be operated at 3500 kw (continuous rating) for two hours or until operating temperature has stabilized prior to retest (i.e., the 24 hour run does not have to be repeated).

6. Special Test Exceptions - Shutdown Margin

Generic Letter Section: 12
T/S: 4.10.1.2 (Units 1 and 2)
Page: 3/4 10-1 (Units 1 and 2)

The requirement to perform a rod drop test for full length rods that are not fully inserted is changed from within 24 hours to within 7 days prior to reducing shutdown margin below the limits of T/S 3.1.1.1.

7. Radioactive Effluents - Waste Gas Storage Tanks

Generic Letter Section: 13
T/S: 4.11.2.6 (Units 1 and 2)
Page: 3/4 11-14 (Units 1 and 2)

The requirement to verify the quantity of radioactive material contained in each gas storage tank is changed from once per 4 days to once per 7 days whenever radioactive materials are added to the tank and to once per 24 hours during primary coolant system degassing operations.

B. JUSTIFICATION FOR CHANGES

The changes proposed in this letter are consistent with guidance provided in Generic Letter 93-05. This generic letter was the result of a comprehensive examination of surveillance requirements in T/Ss that require testing during power operation. This effort was part of the NRC's T/S Improvement Program. In performing this study, which was published as NUREG 1366, the NRC staff found that, while the majority of the testing at power is important, safety can be improved, equipment degradation decreased, and an unnecessary burden on personnel resources eliminated by reducing the amount of testing that the T/Ss require during power operation. Generic Letter 93-05 provided guidance to assist licensees in preparing a license amendment request to implement the staff recommendations as line-item improvements.

Generic Letter 93-05 stated that licensees should not propose changes to extend any surveillance interval if the recommendations of NUREG-1366 are not compatible with plant operating experience. We have reviewed our proposed changes against our operating experience and have found them to be compatible.

C. 10 CFR 50.92 CRITERIA

Per 10 CFR 50.92, a proposed change does not involve a significant hazards consideration if the change 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 evaluated, or
3. involve a significant reduction in a margin of safety.

Criterion 1

Although the surveillance requirements are lessened by these proposed changes, the changes are consistent with those found acceptable by the NRC in Generic Letter 93-05. The proposed changes have been determined to be compatible with our plant operating experience. Based on these considerations, it is concluded that the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The proposed changes do not involve physical changes to the plant or changes in plant operating configuration. The changes only involve the frequency of testing required to be performed. The changes are consistent with those found to be acceptable by the NRC in Generic Letter 93-05. Thus, it is concluded that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Criterion 3

Although the surveillance requirements are lessened by these proposed changes, the changes are consistent with those found acceptable by the NRC in Generic Letter 93-05. The proposed changes have been determined to be compatible with our plant operating experience. Based on these considerations, it is concluded that the changes do not involve a significant reduction in a margin of safety.