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SUBJECT: Application for amends to licenses DPR-58 & DPR-74, proposed
 TSS Amend to allow relocation of radiological effluent.

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Power Company
P.O. Box 16631
Columbus, OH 43216



AEP:NRC:1093
GL 89-01

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
GENERIC LETTER 89-01
PROPOSED TECHNICAL SPECIFICATIONS AMENDMENT TO ALLOW
RELOCATION OF THE RADIOLOGICAL EFFLUENT T/Ss

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

Attn: W. T. Russell

August 3, 1994

Dear Mr. Russell:

This letter is written in response to the guidance provided in generic letter (GL) 89-01 and constitutes an application for amendment to the technical specifications (T/Ss) for Donald C. Cook Nuclear Plant Units 1 and 2. In accordance with the guidance contained in GL 89-01, the proposed T/Ss amendment will allow the radiological effluent T/Ss to be relocated to other controlled documents. Procedural details contained in the current radiological effluents T/Ss have been relocated to either the Offsite Dose Calculation Manual (ODCM) or the Process Control Program (PCP), as applicable. Proposed revisions to the ODCM and PCP have been prepared in accordance with the proposed changes to the administrative controls section of the T/Ss so that they may be implemented immediately upon issuance of the proposed amendment.

We believe the proposed changes to the T/Ss meet the regulatory requirements for radioactive effluents and radiological environmental monitoring, and provide a line-item improvement of the T/Ss consistent with the goals of the Commission's Interim Policy Statement on Technical Specification Improvements specified in GL 89-01. Therefore, we believe that the proposed T/Ss changes can be reviewed and approved by the Donald C. Cook Nuclear Plant Project Manager.

The reason for the proposed changes is to comply with GL 89-01. 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.

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ADD

Attachment 1 contains a summary of the changes and a significant hazards consideration, per 10 CFR 50.92(c), for differences between the proposed ODCM and the current T/Ss. Attachment 2 contains the current T/Ss pages marked to reflect the proposed changes. Attachment 3 contains the proposed, revised T/Ss pages. Attachment 4 contains the proposed revision to the ODCM to incorporate the procedural details from the T/Ss. Attachment 5 contains the proposed revision to the PCP to incorporate the procedural details from the T/Ss.

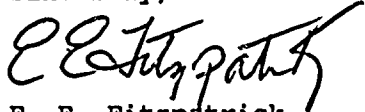
In accordance with 10 CFR 50.91(a), our evaluation of the change indicates no significant hazards because this change does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated because relocating the Radiological Effluent Technical Specifications to the Offsite Dose Calculation Manual or the Process Control Program is strictly an administrative change that does not reduce or modify any existing safety requirement of procedures; (2) create the possibility of a new or different kind of accident from any accident previously evaluated because no new accident scenario is created and no previously evaluated accident scenario is changed by relocating procedural requirements from one controlled document to another; or (3) involve a significant reduction in a margin of safety because no modification of any plant structure, system, component, or operating procedure is associated with this administrative change so all safety margins remain unchanged.

These proposed changes have been reviewed and approved by the Plant Nuclear Safety Review Committee and 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 the Michigan Public Service Commission and 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

Attachments

cc: A. A. Blind
G. Charnoff
J. B. Martin - Region III
NFEM Section Chief
NRC Resident Inspector - Bridgman
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 GENERIC LETTER 89-01 PROPOSED TECHNICAL SPECIFICATIONS AMENDMENT TO ALLOW RELOCATION OF THE RADIOLOGICAL EFFLUENT T/Ss and knows the contents thereof, and that said contents are true to the best of his knowledge and belief.

EE Fitzpatrick

Subscribed and sworn to before me this 3rd
day of August, 1994.

Robin S. Richey
NOTARY PUBLIC

ROBIN S. RICHEY
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 3-31-97

Lab

Sample

10/10/10

Attachment 1 to AEP:NRC:1093

Significant Hazards Consideration

for the Differences between the ODCM and the T/Ss

and

Summary of Changes to the Proposed Technical Specifications

for Donald C. Cook Nuclear Plant Units 1 and 2

Justification for the differences between
the Offsite Dose Calculation Manual
and the Technical Specifications

As per the recommendations of Generic Letter 89-01, the radiological effluent technical specifications (T/S/) were incorporated into the Offsite Dose Calculation Manual (ODCM). Most of the specifications were moved without any change to the technical content. However, this opportunity was used to enhance two T/Ss items which were moved to the ODCM. Since the two T/Ss being moved differ from how they currently exist, a significant hazards consideration is provided below.

DESCRIPTION OF THE CHANGES

1. Move T/S 3.11.1.1 to ODCM steps 4.2.3.1 and 4.2.3.2.

We propose to modify the liquid effluents T/S by creating a separate action statement (ODCM 4.2.3.2.3) for the turbine room sump releases. The action statement for all other points of release remain the same (ODCM 4.2.3.1.3). The ODCM equivalent T/S limiting condition for operation and applicability constraints also remain the same. The ODCM action statement for turbine room sump releases replaces the action of restoring the concentration within the limits, to performing a dose projection.

2. Move T/S Table 3/12-1 to ODCM Attachment 3.19 and update the table by including the six new ground monitoring wells in the table.

JUSTIFICATION FOR THE PROPOSED T/S CHANGE

The change to the T/S 3.11.1 on liquid effluent concentrations was made to exclusively identify the releases from the turbine room sump. The releases from the turbine room sump will be handled separately from the other liquid effluent releases. Releases from the turbine room sump will be regulated by section 4.2.3.2 of the ODCM. The existing T/S calls for the immediate restoration of the concentration to within the limits of 10 CFR 20, Appendix B, Table II, Column 2, if those limits are exceeded. Essentially, this means that either the release must be terminated or dilution flow must be added. Neither of these operations can be accomplished with the discharge through the turbine room sump. Therefore, the T/S was changed to reflect the action that would be taken if a limit was exceeded. Administrative controls are in place, via controlled procedures, to ensure the radioisotope concentrations remain within the limits of 10 CFR 20 during releases. Our operating history of this release point provides assurance that the administrative controls will be effective in maintaining releases within the limits.

During the preparation of this submittal, six new ground monitoring wells were added to the Radiological Environmental Monitoring Program. The current T/Ss require that seven wells be tested for gamma isotopes and tritium on a quarterly basis. The addition of the six new wells brings the total number of sampling stations to 13 that are being tested for gamma isotopes and tritium. This change is considered to be conservative.

10 CFR 50.92 CRITERIA

As stated in 10 CFR 50.92(c), 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, or (2) the change does not create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) the change does not involve a significant reduction in a margin of safety.

Criterion 1

The changes described above in no way negatively impact the requirements of the T/Ss. Separating the turbine room sump releases from the others is purely a clarification of the method we handle releases. The six ground monitoring wells added to the T/S table updates our current monitoring practice. With the six extra wells to monitor, we exceed the monitoring requirements of the T/Ss. Therefore, it is concluded that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

No changes to the LCOs for either T/S are proposed as part of this amendment request. The proposed change does not involve any physical changes to the plant or any changes to plant operations. The changes merely propose to update our methods of implementing the T/S with our current practices. Thus, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Criterion 3

The changes described above in no way negatively impact the requirements of the T/Ss. Separating the turbine room sump releases from the others is purely a clarification of the method we handle releases. The six ground monitoring wells added to the T/S table updates our current monitoring practice. With the extra wells to monitor, we exceed the monitoring requirements called for in the T/Ss. Therefore, it is concluded that the proposed changes do not involve a reduction in the margin of safety.

Pending T/S Proposals Impacting This Submittal

There are no T/S submittals pending NRC approval that would affect this proposal.

The following pages contain two tables which are provided to assist the reviewer in following the movement and reasoning of the proposed changes. The first table contains the location (ODCM or PCP) of the moved T/Ss. The second table contains the current T/S page replacements with the proposed T/S pages. Also in this table are the reasons and/or guidance followed which governed the changes.

Location of Changed Technical Specifications

<u>Changed T/S</u>	<u>Action / New Location</u>
3/4.3.3.9	Moved to ODCM 4.2.1
Table 3.3-12	Moved to ODCM Attachment 3.2
Table 4.3-8	Moved to ODCM Attachment 3.3
3/4.3.3.10	Moved to ODCM 4.2.2; rewrote part as T/S 3/4.3.3.9
Table 3.3-13	Moved Item 1 to Table 3.3-12, rest to ODCM Att. 3.4
Table 4.3-9	Moved Item 1 to Table 4.3-8, rest to ODCM Att. 3.5
3/4.11.1.1	Moved to ODCM 4.2.3.1 & 4.2.3.2
Table 4.11-1	Moved to ODCM Attachment 3.6
3/4.11.1.2	Moved to ODCM 4.2.3.3
3/4.11.1.3	Moved to ODCM 4.2.3.4
3/4.11.1.4	Renumbered to T/S 3/4.11.1
3/4.11.2.1	Moved to ODCM 4.2.4.1
Table 4.11-2	Moved to ODCM Attachment 3.7
3/4.11.2.2	Moved to ODCM 4.2.4.2
3/4.11.2.3	Moved to ODCM 4.2.4.3
3/4.11.2.4	Moved to ODCM 4.2.4.4
3/4.11.2.5	Renumbered to T/S 3/4.11.2.1
3/4.11.2.6	Renumbered to T/S 3/4.11.2.2
3/4.11.3	Moved to PCP 4.4.14 & 4.4.15
3/4.11.4	Moved to ODCM 4.2.5
3/4.12.1	Moved to ODCM 4.5.2
Table 3.12-1	Moved to ODCM Attachment 3.19
Table 3.12-2	Moved to ODCM Attachment 3.21
Table 4.12-1	Moved to ODCM Attachment 3.20
3/4.12.2	Moved to ODCM 4.5.3
3/4.12.3	Moved to ODCM 4.5.4
6.9.1.6 & 6.9.1.7	Combined into T/S 6.9.1.6 and rewrote
6.9.1.7	Moved specifics to ODCM 4.8.1
6.9.1.8 & 6.9.1.9	Combined into T/S 6.9.1.7 and rewrote
6.9.1.9	Moved specifics to ODCM 4.8.2 and PCP 5.2
6.9.1.10	Renumbered to 6.9.1.8
6.9.1.11.1,2,3,4	Renumbered to 6.9.1.9.1,2,3,4
6.9.2.i,j	Covered by moving T/Ss 3/4.11.1 thru 3/4.11.4
6.9.2.k,l,m	Covered by moving T/Ss 3/4.12.1 & 3/4.12.2
6.13	Previously Deleted T/S - removed it
6.14	Renumbered to 6.13 and rewrote
6.15	Renumbered to 6.14 and rewrote
6.16	Moved to PCP 5.3 and 5.4

Reason for T/S Change and Affected Pages

<u>Insert</u>	<u>Remove</u>	<u>Reason</u>
Unit 1 page I and page II Unit 2 page II	page I and page II page II	Solidification no longer in Section 1.0, DEFINITIONS.
Unit 1 page V Unit 2 page V	page V page V	Radioactive Liquid Effluent Instrumentation removed. Radioactive Gaseous Process and Effluent Monitoring Instrumentation renamed to Explosive Gas Monitoring Instrumentation and moved to page 3/4 3-57 for Unit 1, and moved to page 3/4 3-53 for Unit 2.
Unit 1 page X Unit 2 page X	page X page X	All but two Sections of 3/4.11, Liquid Holdup Tanks and Gaseous Effluents, are being deleted. Section 3/4.12, Radiological Environmental Monitoring, is being deleted. Added Section 3/4.9.15 title to the Index since it was missing.
Unit 1 page XI through page XVII Unit 2 page XI through page XVII	page XI through page XVIII page XI through page XVIII	Renumbered all pages. All but two Bases Sections of 3/4.11, Liquid Holdup Tanks and Gaseous Effluents, are being deleted. Bases Section 3/4.12, Radiological Environmental Monitoring, is being deleted. Renumbered Sections 6.14 & 6.15 to 6.13 & 6.14, respectively, deleted Section 6.16. Added Bases Section 3/4.9.15 title and Administrative Controls Section 6.5.2 title (continued), which were missing from the Index.
Unit 1 page 1-5 and page 1-6 Unit 2 page 1-6 and page 1-7	page 1-5 and page 1-6 page 1-6 and page 1-7	1.28 - revised per GL 89-01 1.29 - existing wording deleted, intentionally left blank. 1.30 - revised per GL 89-01. For Unit 1, text shifted between pages.

Reason for T/S Change and Affected Pages

<u>Insert</u>	<u>Remove</u>	<u>Reason</u>
Unit 1 pages 3/4 3-36, 3/4 3-36a, 3/4 3-38, and 3/4 3-38a Unit 2 pages 3/4 3-35, 3/4 3-35a, 3/4 3-37, and 3/4 3-37a	pages 3/4 3-36, 3/4 3-36a, 3/4 3-36b, 3/4 3-38, 3/4 3-38a, and 3/4 3-38b pages 3/4 3-35, 3/4 3-35a, 3/4 3-35b, 3/4 3-37, 3/4 3-37a, and 3/4 3-37b	The tables on these pages contained references to the portion of T/S 3.3.3.10 that has been moved to the ODCM. The references have been updated. Changed page orientation from landscape to portrait, which subsequently condensed the three page tables into two page tables.
Unit 1 page 3/4 3-57 Unit 2 page 3/4 3-53	page 3/4 3-57 page 3/4 3-53	Existing 3/4 3.3.3.9, Radioactive Liquid Effluent Instrumentation, has been deleted per GL 89-01. The radioactive effluent monitoring portion of the existing 3/4 3.3.3.10, Radioactive Gaseous Process and Effluent Monitoring Instrumentation, was deleted, and the remaining portion of T/S 3.3.3.10 was renumbered to 3/4 3.3.3.9, renamed to Explosive Gas Monitoring Instrumentation, revised per GL 89-01, and moved from page 3/4 3-62 to 3/4 3-57 for Unit 1 and from page 3/4 3-58 to 3/4 3-53 for Unit 2.
Unit 1 page 3/4 3-58 through page 3/4 3-59 Unit 2 page 3/4 3-54 through page 3/4 3-55	page 3/4 3-58 through page 3/4 3-68 page 3/4 3-54 through page 3/4 3-64	As part of the existing 3/4 3.3.3.9, the existing Table 3.3-12, Radioactive Liquid Effluent Monitoring Instrumentation, and Table 4.3-8, Radioactive Liquid Effluent Monitoring Instrumentation Surveillance Requirements are being deleted. New Tables 3.3-12, Explosive Gas Monitoring Instrumentation, and 4.3-8, Explosive Gas Monitoring Instrumentation Surveillance Requirements, appear on these pages. These new Tables consist of Item 1 from Table 3.3-13 and Item 1 from Table 4.3-9. The remainder of these Tables are being deleted.

Reason for T/S Change and Affected Pages

<u>Insert</u>	<u>Remove</u>	<u>Reason</u>
Unit 2, page 3/4 3-56 and page 3/4 3-57	page 3/4 3-65 and page 3/4 3-66	Unit 2 Section 3/4.3.4, Turbine Overspeed Protection, was moved from pages 3/4 3-65 and 3/4 3-66 to pages 3/4 3-56 and 3/4 3-57, respectively.
Unit 1 page 3/4 11-1 through page 3/4 11-3 Unit 2 page 3/4 11-1 through page 3/4 11-3	page 3/4 11-1 through page 3/4 11-17 page 3/4 11-1 through page 3/4 11-17	<p>These pages encompass Section 3/4.11 (Radioactive Effluents) of the existing T/S, which we are proposing to extensively modify in accordance with GL 89-01, as follows. The following Sections are being deleted:</p> <p>3/4 11.1.1, Liquid Effluents, page 3/4 11-1; Table 4.11-1, page 3/4 11-2; Table 4.11-1 (Cont.), page 3/4 11-3; 3/4 11.1.2 Dose, page 3/4 11-4; 3/4 11.1.3, Liquid Waste Treatment, page 3/4 11-5; 3/4 11.2.1, Dose Rate, page 3/4 11-7; Table 4.11-2, page 3/4 11-8; Table 4.11-2 (Cont.), page 3/4 11-9; 3/4 11.2.2, Dose, Noble Gases, page 3/4 11-10; 3/4 11.2.3, Doses, Radionuclides, Radioactive Material in Particulate Form, and Radionuclides Other than Noble Gases, page 3/4 11-11; 3/4 11.2.4, Gaseous Radwaste Treatment, page 3/4 11-12; 3/4 11.3, Solid Radioactive Waste, page 3/4 11-15 and page 3/4 11-16, 3/4 11.4, Total Dose, page 3/4 11-17.</p>

Reason for T/S Change and Affected Pages

<u>Insert</u>	<u>Remove</u>	<u>Reason</u>
continued	continued	<p>Consequently, only the following existing T/Ss will not be deleted from Section 3/4.11:</p> <p>3/4 11.1.4, Liquid Holdup Tanks, page 3/4 11-6; 3/4 11.2.5, Explosive Gas Mixture, page 3/4 11-13; 3/4 11.2.6, Gas Storage Tanks, page 3/4 11-14</p> <p>The T/Ss will be renumbered and will appear on the following pages:</p> <p>3/4 11.1, Liquid Holdup Tanks, page 3/4 11-1; 3/4 11.2, Gaseous Effluents, page 3/4 11-2; 3/4 11.2.1, Explosive Gas Mixture, page 3/4 11-2; 3/4 11.2.2, Gas Storage Tanks, page 3/4 11-3</p> <p>Pages 3/4 11-4 through 3/4 11-17 will be deleted.</p>
Unit 1 -none-	page 3/4 12-1 through page 3/4 12-10	Section 3/4.12, Radiological Environmental Monitoring, is being deleted per GL 89-01.
Unit 2 -none-	page 3/4 12-1 through page 3/4 12-10	
Unit 1 page 6-12 through page 6-22	page 6-12 through page 6-23	To incorporate the changes listed in GL 89-01, a new Section, 6.8.4, was added. This Section has two subsections, 6.8.4(a) and 6.8.4(b).
Unit 2 page 6-12 through page 6-22	page 6-12 through page 6-23	Their numbers from the Standard Technical Specifications are 6.8.4(g) and 6.8.4(h).

Reason for T/S Change and Affected Pages

<u>Insert</u>	<u>Remove</u>	<u>Reason</u>
continued	continued	<p>Per GL 89-01, 6.9.1.6 has been rewritten. The number for this Section in the Standard Technical Specifications is 6.9.1.3.</p> <p>The existing Section 6.9.1.7 has been deleted.</p> <p>Per GL 89-01, 6.9.1.8 has been rewritten and renumbered to 6.9.1.7. The number for this Section in the Standard Technical Specifications is 6.9.1.4.</p> <p>The existing Section 6.9.1.9 has been deleted.</p> <p>Section 6.9.1.10 renumbered to 6.9.1.8 Section 6.9.1.11.1 renumbered to 6.9.1.9.1 Section 6.9.1.11.2 renumbered to 6.9.1.9.2 Section 6.9.1.11.3 renumbered to 6.9.1.9.3 Section 6.9.1.11.4 renumbered to 6.9.1.9.4</p> <p>Section 6.9.2, Special Reports, was modified to remove reporting requirements in the T/S Sections that are proposed to be moved to the ODCM.</p> <p>Section 6.10.2(n) was added as outlined in GL 89-01. The number for this Section in the Standard Technical Specifications is 6.10.3(o).</p> <p>Section 6.13 was deleted.</p> <p>Section 6.14, Process Control Program, was rewritten per GL 89-01 and renumbered to 6.13.</p> <p>Section 6.15, Offsite Dose Calculation Manual, was rewritten per GL 89-01 and renumbered to 6.14.</p>

Reason for T/S Change and Affected Pages

<u>Insert</u>	<u>Remove</u>	<u>Reason</u>
Unit 1 page B 3/4 3-4 and page B 3/4 3-7 Unit 2 page B 3/4 3-1c and page 3/4 3-3	page B 3/4 3-4 and page B 3/4 3-7 page B 3/4 3-1c, B 3/4 3-3 and page B 3/4 3-4	Corresponding Bases pages are being revised to accommodate the deletions and reorganizations described above. Unit 2 Bases Section 3/4.3.3.7 was deleted since T/S 3/4.3.3.7 was deleted in a previous submittal.
Unit 1 page B 3/4 11-1 Unit 2 page B 3/4 11-1	page B 3/4 11-1 through page B 3/4 11-5 page B 3/4 11-1 through page B 3/4 11-5	Corresponding bases pages are being revised to accommodate the deletions and reorganizations described above.
Unit 1 -none- Unit 2 -none-	page B 3/4 12-1 page B 3/4 12-1	Bases Section 3/4.12, Radiological Environmental Monitoring, is being deleted per GL 89-01.

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Attachment 4 to AEP:NRC:1093

Proposed Changes to the Offsite Dose Calculation Manual

in Response to Generic Letter 89-01