

PRIORITY 1

ACCELERATED RIDS PROCESSING

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9506060449 DOC. DATE: 95/05/26 NOTARIZED: YES DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316
 AUTH. NAME AUTHORITY AFFILIATION
 FITZPATRICK, E. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk) *See Reports*

SUBJECT: Application for amends to licenses DPR-58 & DPR-74, modifying
 tech specs 3/4.3.1 (Reactor Trip Sys Instrumentation) &
 3/4.3.2 (ESFAS Instrumentation) & bases to relocate tables
 of response time limits to UFSAR, per GL 93-08.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6+44
 TITLE: OR Submittal: General Distribution

NOTES:

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD3-1 LA	1 1	PD3-1 PD	1 1
HICKMAN, J	1 1		
INTERNAL: <u>FILE CENTER 01</u>	1 1	NRR/DE/EMCB	1 1
NRR/DRCH/HICB	1 1	NRR/DSSA/SPLB	1 1
NRR/DSSA/SRXB	1 1	NUDOCS-ABSTRACT	1 1
OGC/HDS2	1 0		
EXTERNAL: NOAC	1 1	NRC PDR	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

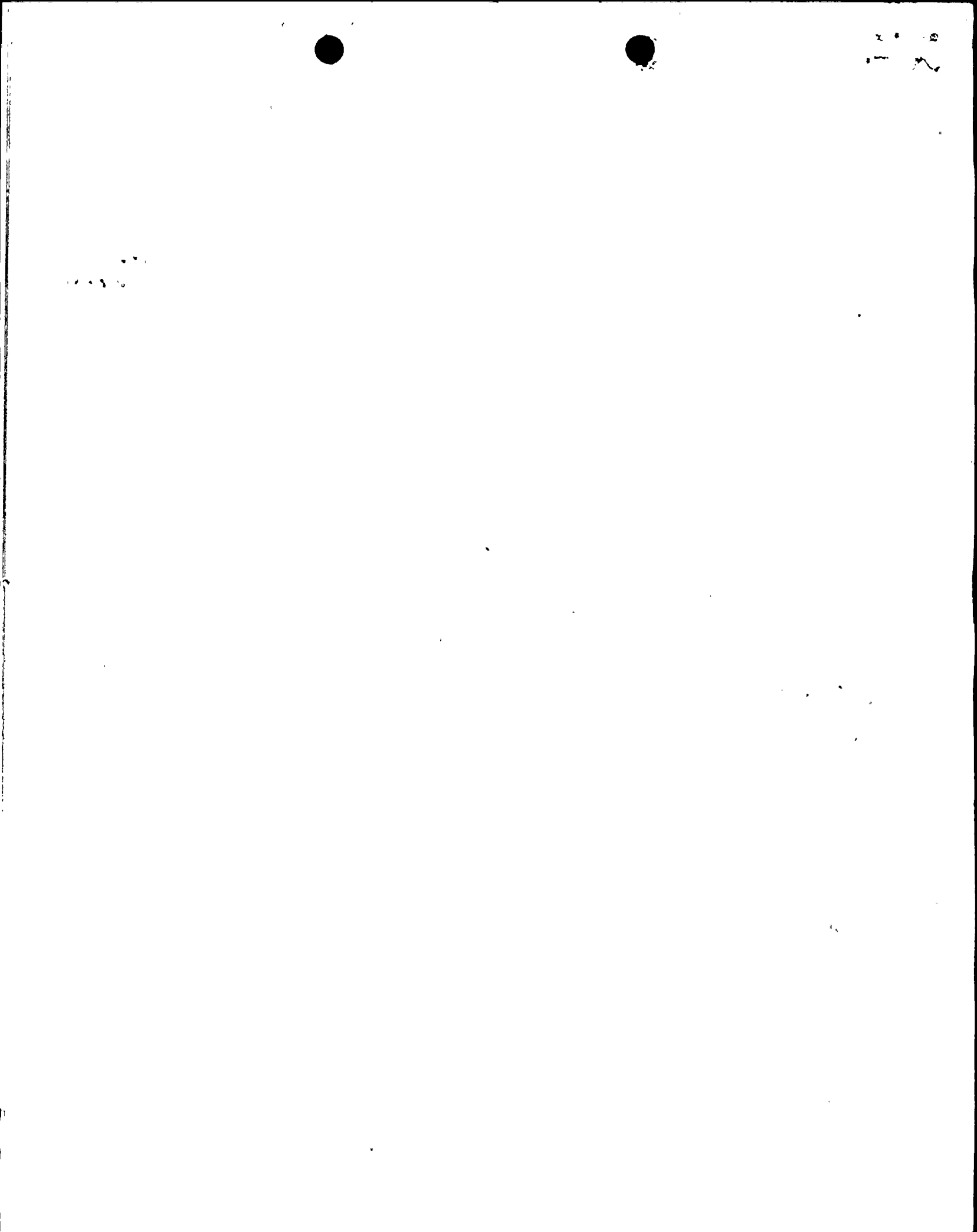
PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL
 DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM
 DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 12 ENCL 11

P
R
I
O
R
I
T
Y

1

D
O
C
U
M
E
N
T





May 26, 1995

AEP:NRC:1210

Docket Nos.: 50-315
50-316

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

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
RELOCATION OF TECHNICAL SPECIFICATION
TABLES OF INSTRUMENT RESPONSE TIME LIMITS
(GENERIC LETTER 93-08)

This letter and its attachments constitute an application for amendment of the technical specifications (T/Ss) for the Donald C. Cook Nuclear Plant units 1 and 2. Specifically, we propose to modify T/Ss 3/4.3.1 (Reactor Trip System Instrumentation) and 3/4.3.2 (Engineered Safety Feature Actuation System Instrumentation) and their accompanying Bases, to relocate the tables of response time limits to the UFSAR. These changes are submitted as a line item improvement in accordance with the guidance of Generic Letter 93-08.

Attachment 1 provides a detailed description of the proposed changes, 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 revised T/S pages.

We believe that 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.

The proposed changes have been reviewed by the Plant Nuclear Safety Review Committee and the Nuclear Safety and Design Review Committee.

9506060449 950526
PDR ADDCK 05000315
P PDR

Adol
11

11-1000

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.

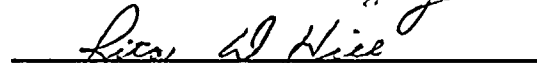
Sincerely,



E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 26th DAY OF May 1995



Notary Public

My Commission Expires: 6-28-99

eh

Attachments

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

100

100

ATTACHMENT 1 TO AEP:NRC:1210

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

9506060449

DESCRIPTION OF CHANGES

1. Units 1 and 2 technical specification (T/S) Tables 3.3-2 (Reactor Trip System Instrumentation Response Times) and 3.3-5 (Engineered Safety Features Response Times) are deleted. As discussed below, the information currently contained in these tables will be relocated to the UFSAR.
2. Units 1 and 2 T/Ss 3.3.1.1 and 3.3.2.1 are modified to remove reference to Tables 3.3-2 and 3.3-5, respectively.
3. Units 1 and 2 Bases page B 2-7 is modified to remove specific time response information from the description of the reactor coolant bus undervoltage and underfrequency reactor trips.
4. Unit 1 Bases page B 3/4 3-1 and unit 2 Bases pages B 3/4 3-1 and B 3/4 3-1a are revised to delete discussion of response times designated as "not applicable" and response times associated with RWST and VCT valves.
5. Units 1 and 2 T/S 4.3.1.1.3 is modified to include a footnote currently located in the response time table (Table 3.3-2). The footnote states:

"Neutron detectors are exempt from response time testing. Response time of the neutron flux signal portion of the channel shall be measured from detector output or input of first electronic component in channel."
6. Footnotes associated with previous surveillance interval extensions were deleted from Unit 2 pages 3/4 3-1 and 3/4 3-14.

REASON AND JUSTIFICATION FOR CHANGES

Generic Letter (GL) 93-08 was issued by the NRC to provide guidance to licensees for requesting a license amendment to relocate tables of instrument response time limits from the T/Ss to the UFSAR. The NRC developed this line item improvement in response to T/S proposals by applicants for operating licenses. As discussed in the GL, licensees were encouraged to propose T/S changes that are consistent with the guidance given in the enclosures to the GL.

The limiting conditions for operation (LCOs) for the reactor trip and engineered safety features actuation system (ESFAS) instruments require that these systems be operable with response times as specified in the T/S tables. The surveillance requirements specify that the licensee test these systems and verify that the response

time of each function is within its limits. Relocating the tables of the reactor trip and ESFAS instrument response time limits from the T/Ss to the UFSAR will not alter these surveillance requirements. The UFSAR will now address the response time limits for the reactor trip and ESFAS instruments, including those channels for which the response time limit is indicated as "not applicable." The UFSAR will also clarify response time limits where footnotes are included in the tables that describe how those limits are applied. This T/S change allows us to administratively control changes to the response time limits for the reactor trip and ESFAS instruments in accordance with the provisions of 10 CFR 50.59 without the need to process a T/S amendment request.

The present time response surveillance requirements (T/Ss 4.3.1.1.3 and 4.3.2.1.3) do not reference the response time tables. Therefore, the surveillance requirements did not need to be modified to implement the changes. However, a footnote in the reactor trip response time table (Table 3.3-2) contains a statement exempting neutron detectors from response time testing. So that this exemption will be maintained, we have modified surveillance requirement 4.3.1.1.3 to include the text currently in the footnote. This is in accordance with the recommendations of GL 93-08.

As recommended by GL 93-08, we have confirmed that plant procedures for response time testing include acceptance criteria that reflect the reactor trip and ESFAS response time limits in the tables being relocated from the T/Ss to the UFSAR. Following NRC approval, the response time limits will be included in the UFSAR in accordance with 10 CFR 50.71(e).

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 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

The proposed changes will not involve a significant increase in the probability of an accident previously evaluated because the changes will not result in a change to any of the process variables that might initiate an accident. There are no physical changes to the plant associated with this T/S change. The consequences of an accident previously evaluated will not be increased because the changes simply allow relocation of response time limits to the UFSAR. Time response testing will continue to be required by the T/Ss. Any changes to the response time values will be made in accordance with the requirements of 10 CFR 50.59. It is noted that these T/S changes have previously been determined acceptable by the NRC in GL 93-08.

CRITERION 2

The proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated because the changes will involve no physical changes to the plant nor any changes in plant operations. Time response testing will continue to be required by the T/Ss. Any changes to the time response values will be made in accordance with the requirements of 10 CFR 50.59. It is noted that these changes have previously been determined acceptable by the NRC in GL 93-08.

CRITERION 3

The proposed amendment will not involve a significant reduction in a margin of safety because time response testing will continue to be required by the T/Ss. Any changes to the response time values will be made in accordance with the requirements of 10 CFR 50.59. It is noted that these changes have previously been determined acceptable by the NRC in GL 93-08.