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SUBJECT: Application for amends to licenses DPR-58 & DPR-74, revising
 TS Containment Sys Bases 3/4.6.1.4 re internal pressure &
 3/4.6.1.5 re air temp.

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October 8, 1998

AEP:NRC:1317
10 CFR 50.92

Docket Nos.: 50-315
50-316

U.S. Nuclear Regulatory Commission
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Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
TECHNICAL SPECIFICATION AMENDMENT - CONTAINMENT SYSTEMS BASES
3/4.6.1.4 INTERNAL PRESSURE and 3/4.6.1.5 AIR TEMPERATURE

This letter and its attachments constitute an application for amendment to the technical specifications (T/Ss) bases for Cook Nuclear Plant units 1 and 2. This amendment proposes to change Containment Systems T/S bases 3/4.6.1.4, Internal Pressure, and 3/4.6.1.5, Air Temperature.

Background information relevant to the T/S and our analyses concerning significant hazards considerations is contained in attachment 1 to this letter. Attachment 2 contains current T/S pages marked up to show where the bases changes will be made. Attachment 3 contains the new proposed T/S bases pages.

The proposed change has been reviewed by the plant nuclear safety review committee and the nuclear safety and design review committee. We request that the approved T/S amendment be effective thirty days from issuance.

In accordance 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.

Sincerely,

R. P. Powers
Vice President

/jmc

Attachments

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 8th DAY OF October, 1998

Notary Public

VALERIE L. BUNNELL

My Commission Expires Notary Public, Berrien County, MI
My Commission Expires Sept. 5, 2002

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ATTACHMENT 1 TO AEP:NRC:1317

SUPPORTING ANALYSES FOR
TECHNICAL SPECIFICATION AMENDMENT - CONTAINMENT SYSTEMS BASES
3/4.6.1.4 INTERNAL PRESSURE and 3/4.6.1.5 AIR TEMPERATURE

Background

Technical Specifications 3/4.6.1.4, Internal Pressure, and 3/4.6.1.5, Air Temperature, involve a containment pressure and temperature parameter (0.3 psig and 60°F respectively) that must be monitored and controlled during reactor operation. These two parameters are limited by the T/S to ensure the validity of initial condition assumptions used in the calculation for peak containment pressure following a loss of coolant accident (LOCA). This calculation was the basis for a 12 psig design pressure for the Cook Nuclear Plant containments. The bases description of these two operating limits unnecessarily references the current calculated value (11.49 psig) of the peak containment pressure following a LOCA. Because a specific number is provided, changes to the plant or refinements in analysis that result in a change to the maximum calculated peak containment pressure also require changes to these two bases sections. The last such change was made in amendments 214 and 199, for units 1 and 2 respectively, as a result of refined analysis performed for the unit 1 30% steam generator tube plugging amendment.

Inclusion in the bases of the current specific calculated value of 11.49 psig for peak containment pressure is not necessary for an understanding and appreciation of the two operating limits controlled by T/Ss 3.6.1.4 and 3.6.1.5. Further, the 12 psig containment design pressure limit is already included in both bases sections. Therefore, this amendment request is proposing to modify T/S bases 3/4.6.1.4 and 3/4.6.1.5 by deleting reference to the specific numerical value of 11.49 psig currently calculated for the peak containment pressure following a LOCA.

Description of Amendment Request

In T/S bases 3/4.6.1.4 Internal Pressure, delete the second paragraph stating, "The maximum peak pressure resulting from a LOCA event is calculated to be 11.49 psig, which includes 0.3 psig for initial positive containment pressure." Add a new second paragraph stating, "The calculation for maximum peak containment pressure following a LOCA assumes an initial containment pressure of positive 0.3 psig and demonstrates that the 12 psig containment design pressure will not be exceeded."

In the second paragraph of T/S bases 3/4.6.1.5, delete the second sentence, "The lower temperature limit of 60°F will limit the peak pressure to 11.49 psig which is less than the containment design pressure of 12 psig.", and replace it with, "The lower temperature limit of 60°F will limit the calculated peak containment pressure to less than the containment design pressure of 12 psig."

Justification for Amendment

The purpose of technical specifications 3.6.1.4 and 3.6.1.5 is to maintain the validity of containment operating assumptions made in designing the Cook Nuclear Plant containment for a peak pressure of 12 psig. The bases for these specifications are adequately described without including in the discussion a specific numerical value for the current calculated peak containment pressure. The maximum peak containment pressure calculation and the current numerical value of 11.49 psig are properly described in Chapter 14 of the Cook UFSAR. The provisions of 10 CFR 50.59 Changes, tests and experiments, therefore, appropriately control changes or modifications having an impact on the calculation or numerical result. Deleting the current analysis value from the T/Ss will avoid the necessity of changing the T/Ss whenever plant modifications or refined analysis techniques result in changes to the numerical value for the peak calculated containment pressure following a LOCA.

Basis for No Significant Hazards Determination

In accordance with 10 CFR 50.92, this proposed amendment does not involve a significant hazards consideration if it does not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated. The changes to T/S bases 3.6.1.4 and 3.6.1.5 do not involve a physical change to the plant, change in analytical technique or change to any operating limit of the T/Ss. Therefore the probability or consequences of accidents previously evaluated could not be impacted.
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated. The changes to T/S bases 3.6.1.4 and 3.6.1.5 do not involve a physical change to the plant, change in analytical technique or change to any operating limit of the T/Ss. Therefore the possibility of a new or different kind of accident from any accident previously evaluated could not be involved.
- (3) involve a significant reduction in a margin of safety. The changes to T/S bases 3/4.6.1.4 and 3/4.6.1.5 do not involve a physical change to the plant, change in analytical technique or change to any operating limit of the T/Ss. Therefore the change cannot involve a reduction in a margin of safety.