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Mr. Milton P. Alexich, Vice President Indiana Michigan Power Company c/o American Electric Power Service Corporation 1 Riverside Plaza Columbus, Ohio 43216

Dear Mr. Alexich:

AMENDMENTS NOS 116AND 102 TO FACILITY OPERATING LICENSES NOS. DPR-58 AND DPR-74: SNUBBER TESTING FREQUENCY (TACS NOS. 65844/65845)

The Commission has issued the enclosed Amendment No. 116 to Facility Operating License No. DPR-58 and Amendment No. 102 to Facility Operating License No. DPR-74 for the Donald C. Cook Nuclear Plant, Units Nos. 1 and 2. The amendments consist of changes to the Technical Specifications in response to your application dated July 22, 1987.

These amendments revise the Technical Specifications to allow an extension of the functional test frequency from 18 to 24 months for snubbers with a corresponding increase in the test sample from 10% to 14% of the snubbers. The revision also corrects some editorial oversights.

A copy of our related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely.

Original signed by

John F. Stang, Project Manager Project Directorate III-1 Division of Reactor Projects - III, IV, V & Special Projects

Enclosures:

1. Amendment No.116 to DPR-58 2. Amendment No.102 to DPR-74

Safety Evaluation

cc w/enclosures: See next page

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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555 June 15, 1988

Dockets Nos. 50-315 and 50-316

Mr. Milton P. Alexich, Vice President Indiana Michigan Power Company c/o American Electric Power Service Corporation 1 Riverside Plaza Columbus, Ohio 43216

Dear Mr. Alexich:

SUBJECT: AMENDMENTS NOS.116AND 102 TO FACILITY OPERATING LICENSES NOS. DPR-58

AND DPR-74: SNUBBER TESTING FREQUENCY (TACS NOS. 65844/65845)

The Commission has issued the enclosed Amendment No.116 to Facility Operating License No. DPR-58 and Amendment No. 102to Facility Operating License No. DPR-74 for the Donald C. Cook Nuclear Plant, Units Nos. 1 and 2. The amendments consist of changes to the Technical Specifications in response to your application dated July 22, 1987.

These amendments revise the Technical Specifications to allow an extension of the functional test frequency from 18 to 24 months for snubbers with a corresponding increase in the test sample from 10% to 14% of the snubbers. The revision also corrects some editorial oversights.

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Sincerely.

John F. Stang, Project Manager Project Directorate III-1 Division of Reactor Projects - III, IV, V & Special Projects

Enclosures:

1. Amendment No.116 to DPR-58

Amendment No.102 to DPR-74

Safety Evaluation

cc w/enclosures: See next page

Mr. Milton Alexich Indiana Michigan Power Company Donald C. Cook Nuclear Plant

cc: Regional Administrator, Region III U.S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, Illinois 60137

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Mayor, City of Bridgeman Post Office Box 366 Bridgeman, Michigan 49106

Special Assistant to the Governor Room 1 - State Capitol Lansing, Michigan 48909

Nuclear Facilities and Environmental Monitoring Section Office Division of Radiological Health Department of Public Health 3500 N. Logan Street Post Office Box 30035 Lansing, Michigan 48909



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-315

DONALD C. COOK NUCLEAR PLANT, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 116 License No. DPR-58

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Indiana Michigan Power Company (the licensee) dated July 22, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-58 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 116, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Daniel R. Muller, Acting Director

Project Directorate III-1

Division of Reactor Projects - III, IV, V

& Special Projects

Attachment: Changes to the Technical Specifications

Date of Issuance: June 15, 1988



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-316

DONALD C. COOK NUCLEAR PLANT, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 102 License No. DPR-74

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Indiana Michigan Power Company (the licensee) dated July 22, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-74 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 102, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Daniel R. Muller, Acting Director for Dam

Project Directorate III-1

Division of Reactor Projects - III, IV, V

& Special Projects

Attachment: Changes to the Technical Specifications

Date of Issuance: June 15, 1988

ATTACHMENT TO LICENSE AMENDMENTS

AMENDMENT NO.116 FACILITY OPERATING LICENSE NO. DPR-58 AMENDMENT NO.102 FACILITY OPERATING LICENSE NO. DPR-74

DOCKETS NOS. 50-315 AND 50-316

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change.

REMOVE		INSERT
	UNIT 1	
3/4 7-28 3/4 7-29 B 3/4 7-5 B 3/4 7-6		3/4 7-28 3/4 7-29 B 3/4 7-5 B 3/4 7-6
	UNIT 2	
3/4 7-20 3/4 7-21 B 3/4 7-5 B 3/4 7-6		3/4 7-20 3/4 7-21 B 3/4 7-5 B 3/4 7-6

PLANT SYSTEMS

3/4.7.8 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.8 All snubbers listed in Table 3.7-4 shall be OPERABLE

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.8.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.8 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.**

a. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after four months but within 10 months of commencing POWER OPERATION and shall include all snubbers listed in Table 3.7-4. If less than two (2) snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months \pm 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

No. Inoperable Snubbers per Inspection Period	Subsequent Visual Inspection Period*#		
0	18 months ± 25%		
1	12 months \pm 25%		
2 .	6 months $\pm 25\%$		
3,4	$124 \text{ days} \pm 25\%$		
5,6,7	62 days ± 25%		
8 or more	31 days + 25%		

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

*The inspection interval shall not be lengthened more than one step at a time.

#The provisions of Specification 4.0.2 are not applicable.

** The provisions of Specification 4.0.6 are applicable.

SURVEILLANCE REQUIREMENTS (Continued)

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.8.d. However, when the fluid port

of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c. <u>Functional Tests</u>

At least crce per 24 months during shutdown, a representative sample (14%) of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.8.d an additional 10% of that type of Snubber shall be functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

- 1. The first snubber away from each reactor vessel nozzle
- Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.)
- 3. Snubbers within 10 feet of the discharge from a safety relief valve

Snubbers identified in Table 3.7-4 as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample.*

^{*}Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

PLANT	SYSTEMS
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BASES

3/4.7.5 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

The OPERABILITY of the control room emergency ventilation system ensures that 1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system and 2) the control room will remain habitable for operations personnel during and following all credible accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 10 of Appendix "A", 10 CFR 50.

3/4.7.6 ESF VENTILATION SYSTEM

The OPERABILITY of the ESF ventilation system ensures that radioactive materials leaking from the ECCS equipment within the pump room following a LOCA are filtered prior to reaching the environment. The operation of this system and the resultant effect on offsite dosage calculations was assumed in the accident analyses.

3/4.7.7 SEALED SOURCE CONTAMINATION

The limitations on sealed source removable contamination ensure that the total body or individual organ irradiation does not exceed allowable limits in the event of ingestion or inhalation of the probable leakage from the source material. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. Quantities of interest to this specification which are exempt from the leakage testing are consistent with the criteria of 10 CFR Parts 30.11-20 and 70.19. Leakage from sources excluded from the requirements of this specification is not likely to represent more than one maximum permissible body burden for total body irradiation if the source material is inhaled or ingested.

3/4.7.8 HYDRAULIC SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results required a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 24 month intervals. Observed failures of these sample snubbers shall require functional testing of additional units.

The service life of a snubber is evaluated via manufacturer's input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc...). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

The number of snubbers to be functionally tested during each surveillance is based on calculations performed to allow extension of the surveillance interval from 18 months to 24 months, and therefore, the number of snubbers functionally tested deviates from the number required by the Westinghouse Standard Technical Specifications (NUREG-0452, Revision 4).

PLANT SYSTEMS

3/4.7.7 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.7.1 All snubbers listed in Table 3.7-9 shall be OPERABLE.

APPLICABLITY:

MODES 1, 2, 3 and 4 (MODES 5 and 6 for snubbers located on

systems required OPERABLE in those MODES).

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.7.1.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.7.1 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.**

a. Visual Inspection

The first inservice visual inspection of snubbers shall be performed after four months but within 10 months of commencing POWER OPERATION and shall include all snubbers listed in Table 3.7-9. If less than two (2) snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months + 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

No. Inoperable Snubbers per Inspection Period	Subsequent Visual *** Inspection Period
0 1 2	18 months ± 25% 12 months ± 25% 6 months ± 25%
3,4 5,6,7 8 or more	124 days ± 25% 62 days ± 25% 31 days + 25%

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

^{*}The inspection interval shall not be lengthened more than one step at a time.

^{**}The provisions of Specification 4.0.6 are applicable.

^{*}The provisions of Specification 4.0.2 are not applicable.

SURVEILLANCE REQUIREMENTS (Continued)

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.7.1.d as applicable. However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c. Functional Tests +

At least once per 24 months during shutdown, a representative sample (14%) of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.7.1.d an additional 10% of that type of snubber shall be functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

- 1. The first snubber away from each reactor vessel nozzle
- Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.)
- 3. Snubbers within 10 feet of the discharge from a safety relief valve

Snubbers identified in Table 3.7-9 as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample.*

^{*}Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

⁺ The provisions of Specification 4.0.7 are applicable.

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3/4.7.6 ESF VENTILATION SYSTEM

The OPERABILITY of the ESF ventilation system ensures that radioactive materials leaking from the ECCS equipment within the pump room following a LOCA are filtered prior to reaching the environment. The operation of this system and the resultant effect on offsite dosage calculations was assumed in the accident analyses.

3/4.7.7 HYDRAULIC SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results required a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 24 month intervals. Observed failures of these sample snubbers shall require functional testing of additional units.

PLANT SYSTEMS

BASES

The service life of a snubber is evaluated via manufacturer's input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc...). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

The number of snubbers to be functionally tested during each surveillance is based on calculations performed to allow extension of the surveillance interval from 18 months to 24 months, and therefore, the number of snubbers functionally tested deviates from the number required by the Westinghouse Standard Technical Specifications (NUREG-0452, Revision 4).

3/4.7.8 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

3/4.7.9 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, CO₂, Halon and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO.116 TO FACILITY OPERATING LICENSE NO. DPR-58

AND AMENDMENT NO. 102 TO FACILITY OPERATING LICENSE NO. DPR-74

INDIANA MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT, UNITS NOS. 1 AND 2

DOCKETS NOS. 50-315 AND 50-316

1.0 INTRODUCTION

By letter dated July 22, 1987, the Indiana Michigan Power Company (the licensee) requested amendments to the Technical Specifications (TSs) appended to Facility Operating Licenses Nos. DPR-58 and DPR-74 for the Donald C. Cook Nuclear Plant, Units Nos. 1 and 2. The proposed amendments would permit the licensee to perform the functional testing on safety-related snubbers at 24-month intervals instead of the required 18-month period with an initial sample size of 14% instead of the normally required 10%. The proposed amendment would also correct an editorial oversight on visual inspections to include percent signs on the frequency span.

2.0 EVALUATION

To verify the operability of safety-related snubbers, the current Cook 1 and 2 TSs require the functional testing on these snubbers every 18 months with an initial sample size of 10% of the total snubber population. For every inoperable snubber discovered in all testings, a subsequent sample(s) shall be chosen and tested. The 18-month period was selected to accommodate the most commonly adopted fuel cycle period at the time the TSs were written. The size of the 10% initial sample was then determined to ensure that, at a minimum, the number of snubbers in the population will be tested every 15 years.

Operating practices dictate many plants to use fuel cycles other than the 18-month period. Since the 18-month test frequency was arbitrarily selected for the convenience of plant operations, it can and should be varied to accommodate all fuel cycles other than the 18-month period. The consideration that the total number of snubbers in the plant should be tested every 15 years should remain for this test plan. The requested revision using an initial sample size of 14% fulfills this requirement.

The requested TS revision to extend the time period between snubber functional testings to approximately 24 months with an initial sample of 14% of the total snubber population would continue to provide adequate verification of the operability of safety-related snubbers. We therefore conclude that this proposed revision to the TSs is acceptable.

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The proposed correction of an editorial oversight involves the addition of percent signs which, during the issuance of previous amendments, were inadvertently deleted from the \pm values of the visual inspection intervals of 4.7.8.a. Without the percent signs, it is not clear whether the \pm values are \pm 25 months, \pm 25 days, or \pm 25%. Therefore, to avoid misinterpretation, the visual inspection intervals should be modified to again include the percent signs.

3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and a change in a surveillance requirement. We have determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Date: June 15, 1988

Principal Contributor: H. Shaw