

August 29, 1994

Docket Nos. 50-315
and 50-316

Mr. E. E. Fitzpatrick, Vice President
Indiana Michigan Power Company
c/o American Electric Power Service Corporation
1 Riverside Plaza
Columbus, Ohio 43215

Dear Mr. Fitzpatrick:

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2 - ISSUANCE OF
AMENDMENT RE: REMOVAL OF CONTAINMENT ISOLATION VALVE LIST FROM
TECHNICAL SPECIFICATIONS (TAC NOS. M84833 AND M84834)

The Commission has issued the enclosed Amendment No. 181 to Facility Operating License No. DPR-58 and Amendment No. 165 to Facility Operating License No. DPR-74 for the Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated September 24, 1992 and supplemented March 2, 1994.

The amendments remove the list of containment isolation valves from the Technical Specifications.

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 B. Hickman, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 181 to DPR-58
2. Amendment No. 165 to DPR-74
3. Safety Evaluation

cc w/enclosures:
See next page

OFFICE	LA:PD31	PM:PD31	OGC	D:PD31
NAME	CJamerson	Hickman:	EKOLLER	LBMarsh
DATE	08/8/94	08/15/94	08/17/94	08/24/94

OFFICIAL RECORD COPY

FILENAME: G:\WPDOCS\DCCOOK\C084833.AMD

9409070281 940829
PDR ADDCK 05000315
PDR

050044

NRC FILE CENTER COPY

DCA



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 29, 1994

Docket Nos. 50-315
and 50-316

Mr. E. E. Fitzpatrick, Vice President
Indiana Michigan Power Company
c/o American Electric Power Service Corporation
1 Riverside Plaza
Columbus, Ohio 43215

Dear Mr. Fitzpatrick:

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2 - ISSUANCE OF
AMENDMENT RE: REMOVAL OF CONTAINMENT ISOLATION VALVE LIST FROM
TECHNICAL SPECIFICATIONS (TAC NOS. M84833 AND M84834)

The Commission has issued the enclosed Amendment No. 181 to Facility Operating License No. DPR-58 and Amendment No. 165 to Facility Operating License No. DPR-74 for the Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated September 24, 1992 and supplemented March 2, 1994.

The amendments remove the list of containment isolation valves from the Technical Specifications.

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,

A handwritten signature in black ink that reads "John B. Hickman".

John B. Hickman, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 181 to DPR-58
2. Amendment No. 165 to DPR-74
3. Safety Evaluation

cc w/enclosures:
See next page

Mr. E. E. Fitzpatrick
Indiana Michigan Power Company

Donald C. Cook Nuclear Plant

cc:

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Mr. S. Brewer
American Electric Power Service
Corporation
1 Riverside Plaza
Columbus, Ohio 43215

Attorney General
Department of Attorney General
525 West Ottawa Street
Lansing, Michigan 48913

Township Supervisor
Lake Township Hall
Post Office Box 818
Bridgman, Michigan 49106

Al Blind, Plant Manager
Donald C. Cook Nuclear Plant
Post Office Box 458
Bridgman, Michigan 49106

U.S. Nuclear Regulatory Commission
Resident Inspector Office
7700 Red Arrow Highway
Stevensville, Michigan 49127

Gerald Charnoff, Esquire
Shaw, Pittman, Potts and Trowbridge
2300 N Street, N. W.
Washington, DC 20037

Mayor, City of Bridgman
Post Office Box 366
Bridgman, 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
3423 N. Logan Street
P. O. Box 30195
Lansing, Michigan 48909

December 1993

DATED: August 29, 1994

AMENDMENT NO. 181 TO FACILITY OPERATING LICENSE NO. DPR-58-D. C. COOK
AMENDMENT NO. 165 TO FACILITY OPERATING LICENSE NO. DPR-74-D. C. COOK

Docket File
NRC & Local PDRs
PDIII-1 Reading
J. Roe
J. Zwolinski
C. Jamerson
L. B. Marsh
J. Hickman (2)
OGC-WF
D. Hagan
G. Hill (2)
C. Grimes, 0-11F23
ACRS (10)
OPA
OC/LFDCB
W. Kropp, R-III
SEDB



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-315

DONALD C. COOK NUCLEAR PLANT, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 181
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 September 24, 1992 as supplemented March 2, 1994, 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-58 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 181, 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 issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Ledyard B. Marsh, Director
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: August 29, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 181
TO FACILITY OPERATING LICENSE NO. DPR-58
DOCKET NO. 50-315

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 vertical lines indicating the area of change.

REMOVE

1-2
3/4 6-1
3/4 6-14
3/4 6-15
3/4 6-16
3/4 6-17
3/4 6-18
3/4 6-19
3/4 6-20
3/4 6-21
3/4 6-22
B 3/4 6-3

INSERT

1-2
3/4 6-1
3/4 6-14
3/4 6-15
3/4 6-16
-
-
-
-
-
-
B 3/4 6-3

DEFINITIONS

REPORTABLE EVENT

1.7 A REPORTABLE EVENT shall be any of those conditions specified in 10 CFR 50.73.

CONTAINMENT INTEGRITY

1.8 CONTAINMENT INTEGRITY shall exist when:

1.8.1 All penetrations required to be closed during accident conditions are either:

- a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or
- b. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.

1.8.2 All equipment hatches are closed and sealed.

1.8.3 Each air lock is in compliance with the requirements of Specification 3.6.1.3.

1.8.4 The containment leakage rates are within the limits of Specification 3.6.1.2

CHANNEL CALIBRATION

1.9 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated.

CHANNEL CHECK

1.10 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that:
 1. All penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1, and
 2. All equipment hatches are closed and sealed.
- b. By verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3.

*Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked, sealed or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such verification need not be performed more often than once per 92 days.

CONTAINMENT SYSTEMS

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3.1 Each containment isolation valve shall be OPERABLE. Containment purge valves and locked or sealed closed valves may be opened on an intermittent basis under administrative control. The ACTION statement of T/S 3/4.6.3.1 is not applicable to the containment purge supply and exhaust isolation valves. The Limiting Condition for Operation and its associated ACTION statement for these valves is given in Technical Specification 3/4.6.1.7.

APPLICABILITY: MODES 1,2,3 and 4.

ACTION:

With one or more of the containment isolation valve(s) inoperable, either:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange, or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.3.1.1 Each containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of a cycling test and verification of isolation time.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.6.3.1.2 Each containment isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:

- a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position.
- b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position.
- c. Verifying that on a Containment Purge and Exhaust isolation signal, each Purge and Exhaust valve actuates to its isolation position.

4.6.3.1.3 The isolation time of each power operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

Pages 3/4 6-17 through 3/4 6-22
deleted

CONTAINMENT SYSTEMS

BASES

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analyses.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH minimum volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. These assumptions are consistent with the iodine removal efficiency assumed in the accident analyses.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

The opening of containment purge and exhaust valves and locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing a qualified individual, who is in constant communication with control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with 1) zirconium-water reactions, 2) radiolytic decomposition of water and 3) corrosion of metals within containment.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-316

DONALD C. COOK NUCLEAR PLANT, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 165
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 September 24, 1992 as supplemented March 2, 1994, 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. 165, 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 issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Ledyard B. Marsh, Director
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: August 29, 1994

DEFINITIONS

REPORTABLE EVENT

1.7 A REPORTABLE EVENT shall be any of those conditions specified in 10 CFR 50.73.

CONTAINMENT INTEGRITY

1.8 CONTAINMENT INTEGRITY shall exist when:

1.8.1 All penetrations required to be closed during accident conditions are either:

- a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or
- b. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.

1.8.2 All equipment hatches are closed and sealed,

1.8.3 Each air lock is in compliance with the requirements of Specification 3.6.1.3,

1.8.4 The containment leakage rates are within the limits of Specification 3.6.1.2, and

1.8.5 The sealing mechanism associated with each penetration (e.g., welds, bellows or O-rings) is OPERABLE.

CHANNEL CALIBRATION

1.9 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated.

CHANNEL CHECK

1.10 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that:
 1. All penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1, and
 2. All equipment hatches are closed and sealed.
- b. By verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3.

*Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked, sealed or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such verification need not be performed more often than once per 92 days.

CONTAINMENT SYSTEMS

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3.1 Each containment isolation valve shall be OPERABLE. Containment purge valves and locked or sealed closed valves may be opened on an intermittent basis under administrative control. The ACTION statement of Technical Specification 3/4.6.3.1 is not applicable to the containment purge and exhaust isolation valves. The Limiting Condition for Operation and its associated ACTION statement for these valves are given in Technical Specification 3/4.6.1.7.

APPLICABILITY: MODES 1,2,3 and 4.

ACTION:

With one or more of the containment isolation valve(s) inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and either:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

The provisions of Specifications 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.3.1.1 Each containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of a cycling test and verification of isolation time.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.6.3.1.2 Each containment isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:†

- a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position.
- b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position.
- c. Verifying that on a Containment Purge and Exhaust isolation signal, each Purge and Exhaust valve actuates to its isolation position.

4.6.3.1.3 The isolation time of each power operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5

† The provisions of Technical Specification 4.0.8 are applicable.

Page 3/4 6-16 through 3/4 6-32
deleted

CONTAINMENT SYSTEMS

BASES

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analyses.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration ensure a pH value of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. These assumptions are consistent with the iodine removal efficiency assumed in the accident analyses.

The contained water volume limit includes an allowance for water not usable because of tank discharge location or other physical characteristics.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

The opening of containment purge and exhaust valves and locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing a qualified individual, who is in constant communication with control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 181 TO FACILITY OPERATING LICENSE NO. DPR-58
AND AMENDMENT NO. 165 TO FACILITY OPERATING LICENSE NO. DPR-74

INDIANA MICHIGAN POWER COMPANY

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

DOCKET NOS. 50-315 AND 50-316

1.0 INTRODUCTION

By letter dated September 24, 1992 and supplemented March 2, 1994, the Indiana Michigan Power Company (the licensee) requested amendments to the Technical Specifications (TS) appended to Facility Operating License Nos. DPR-58 and DPR-74 for the Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2. The proposed amendments would remove the containment isolation valve lists from the Technical Specifications. In addition, the Technical Specification requirements have been modified such that all references to these lists have been removed. Finally, the Technical Specifications have been modified to state requirements in general terms that include the containment isolation valves that have been removed from the Technical Specifications. Guidance on the proposed Technical Specification change was provided by NRC Generic Letter 91-08, dated May 1, 1991.

2.0 EVALUATION

The licensee has proposed the removal of Table 3.6-1, "Containment Isolation Valves," that is referenced in TS 3/4.6.3. With the removal of this table, the licensee has proposed to include the following statement of the limiting condition for operation (LCO) under TS 3.6.3.1:

Each containment isolation valve shall be OPERABLE.

In addition, the licensee has proposed to revise the definition of Containment Integrity in TS 1.8, the action requirements under TS 3.6.3.1, and the surveillance requirements under TS 4.6.1.1 and 4.6.3.1.1 through 4.6.3.1.3 to remove all references to Table 6.3-1.

The definition of Containment Integrity and TS 4.6.1.1 refer to TS 3.6.3.1 for an exception that would now be included in the text of the LCO rather than by the table removed from the Technical Specifications. With the removal of the reference to Table 6.3-1, the licensee has proposed to state this exception as:

9409070299 940829
PDR ADDCK 05000315
P PDR

..., except for valves that are open under administrative control as permitted by Specification 3.6.3.1.

The table of containment isolation valves identified specific manually-operated locked or sealed closed valves with a footnote stating that these valves may be opened on an intermittent basis under administrative control. These valves are locked or sealed closed consistent with the regulatory requirements for manually-operated valves that are used as containment isolation valves. Because opening these valves would be contrary to the operability requirements of these valves, the following addition to LCO 3.6.3.1 has been proposed:

...locked or sealed closed valves may be opened on an intermittent basis under administrative control.

The surveillance requirements of TS 4.6.3.1.1 through 4.6.3.1.3 have been revised to state "Each containment isolation valve shall ..." or "... each power-operated or automatic containment isolation valve shall ..." rather than stating the requirements in relation to the valves specified in Table 3.6.1.

Finally, the following statement is proposed to be added to the LCO for TS 3.6.3.1:

The provisions of Specification 3.0.4 do not apply.

Section 50.36 of Title 10 of the Code of Federal Regulations established the regulatory requirements related to the content of Technical Specifications. The rule requires that Technical Specifications include items in specific categories, including safety limits, limiting conditions for operation, and surveillance requirements; however, the rule does not specify the particular requirements to be included in a plant's Technical Specifications. The NRC developed criteria, as described in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," (58 FR 39132) to determine which of the design conditions and associated surveillances need to be located in the Technical Specifications. The Final Policy Statement adopted the subjective statement of the Atomic Safety and Licensing Appeal Board, ALAB 531, 9 NRC 263 (1979), (Trojan Nuclear Plant) as the basis for the criteria. The Appeal Board stated,

"... there is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a Technical Specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is the Technical Specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an event giving rise to an immediate threat to the public health and safety."

Briefly, the criteria provided by the Final Policy Statement are (1) detection of abnormal degradation of the reactor coolant pressure boundary, (2) boundary conditions for design basis accidents and transients, (3) primary success paths to prevent or mitigate design basis accidents and transients, and (4) functions determined to be important to risk or operating experience. The Commission's Final Policy Statement acknowledged that its implementation may result in the relocation of existing Technical Specification requirements to licensee controlled documents and programs.

The staff's review of the proposed change determined that the relocation of the list of containment isolation valves, Table 3.6-1, does not eliminate the requirements for the licensee to ensure that the containment isolation valves are capable of performing their safety function. Although the list of containment isolation valves is relocated from the Technical Specifications to a controlled document referenced in the updated final safety analysis report (UFSAR), the licensee must continue to evaluate any changes to the list of valves required for containment isolation in accordance with 10 CFR 50.59. Should the licensee's determination conclude that an unreviewed safety question is involved, due to either (1) an increase in the probability or consequences of accidents or malfunctions of equipment important to safety, (2) the creation of a possibility for an accident or malfunction of a different type than any evaluated previously, or (3) a reduction in the margin of safety, NRC approval and a license amendment would be required prior to implementation of the change. NRC inspection and enforcement programs also enable the staff to monitor facility changes and licensee adherence to UFSAR commitments and to take any remedial action that may be appropriate.

The staff's review concluded that 10 CFR 50.36 does not require the list of containment isolation valves to be retained in Technical Specifications. Requirements related to the operability, applicability, and surveillance requirements, including performance of testing to ensure operability of the containment isolation function is retained due to the importance of containment isolation in mitigating the consequences of an accident. However, the staff determined that the inclusion of the containment isolation valve list is an operational detail related to the licensee's safety analyses which are adequately controlled by the requirements of 10 CFR 50.59. Therefore, the continued processing of license amendments related to revisions of the affected list of containment isolation valves, Table 3.6-1, where the revisions to those requirements do not involve an unreviewed safety question under 10 CFR 50.59, would afford no significant benefit with regard to protecting the public health and safety.

The staff has concluded, therefore, that relocation of the list of containment isolation valves and the associated changes to remove references to the list is acceptable because (1) their inclusion in Technical Specifications is not specifically required by 10 CFR 50.36 or other regulations, (2) the list of containment isolation valves has been relocated to a controlled document referenced in the UFSAR, are adequately controlled by 10 CFR 50.59, and their inclusion in the Technical Specification is not required to avert an immediate threat to the public health and safety, and (3) changes that are deemed to

involve an unreviewed safety question, will require prior NRC approval in accordance with 10 CFR 50.59(c). In regards to the addition of the note exempting the containment isolation valves from the requirements of TS 3.0.4, this change was made, subsequent to this request, by an amendment dated March 16, 1993. Therefore, this request is considered moot.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change the requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has 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 the amendments involve no significant hazards consideration and there has been no public comment on such finding (58 FR 8773). Accordingly, the 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 the amendments.

5.0 CONCLUSION

The staff has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: John B. Hickman, NRR
Thomas G. Dunning, NRR

Date: August 29, 1994