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SUBJECT: Supplemental application for amend to License DPR-58, requesting addl Tech Spec changes for Cycle 8 operations.

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July 25, 1983
AEP:NRC:0745G

Donald C. Cook Nuclear Plant Unit No. 1
Docket No. 50-315
License No. DPR-58
ADDITIONAL TECHNICAL SPECIFICATION CHANGES FOR UNIT 1 CYCLE 8

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

This letter and its Attachment contain seven additional requests for Technical Specification (T/S) changes for the Donald C. Cook Nuclear Plant Unit No. 1, pertinent to Cycle 8 operations. These proposed changes amend our previous submittal letter No. AEP: NRC:0745C, dated May 11, 1983.

The first proposed group of changes footnotes the following FUNCTIONAL UNITS of Table 3.3-1: Nos. 2, 3, 4, 7 (four loop operation only), 8 (four loop operation only), 9 through 17, and 18.A (low fluid oil pressure). The footnote to be inserted on page 3/4 3-6 (see the Attachment) under TABLE NOTATION states: "#The provisions of Specification 3.0.4 are not applicable." This change will allow the unit to change modes under prescribed conditions described in the Technical Specifications. Our justification for this change is twofold:

1) Each of the FUNCTIONAL UNITS being footnoted has redundancy.

2) The change will make the Unit No. 1 Specifications the same as the Unit No. 2 Specifications, and also more similar to the Standard Technical Specification for Westinghouse Pressurized Water Reactors; NUREG-0452, Revision 4.

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Based on the above, we have concluded that this change constitutes a request for relief based upon demonstration of acceptable operation from an operating restriction. Furthermore, while we have concluded that the change may result in some decrease in the safety margin, the results of this change are still clearly within the acceptance criteria with respect to those previously defined in the Standard Technical Specifications. Since our conclusions are consistent with those published under the examples cited on page 14870 of Vol. 48, No. 67 of the Federal Register, it is therefore our belief the proposed change will not constitute Significant Hazards Considerations as defined in 10 CFR 50.92.

The second proposed change is to remove the footnote "High Voltage to detector may be de-energized above P-6," from page 3/4 3-2, and to insert the statement "## High Voltage to detector may be de-energized above P-6," to the TABLE NOTATION (page 3/4 3-6). The reason for this change is to make Unit No. 1 Specifications consistent with Unit No. 2 Specifications. Since the change is purely editorial in nature, we have concluded it does not constitute Significant Hazards Considerations as defined by 10 CFR 50.92.

The third proposed change is the request to add the following statement to ACTION STATEMENT 1 for T/S 3/4.3 (INSTRUMENTATION), Table 3.3-1, on page 3/4 3-6: "however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.1.1.1." This amount of time is needed to complete the required monthly surveillance on one train of this system. Due to additional requirements that have been added to surveillance procedures (i.e., testing the safety injection reset timer, testing for possible failure of the slave coil test switches, and adding double signature verification for manual blocks), this additional time is necessary to perform our surveillances. The increase in the time allotted for the performance of these activities should result in improved performance of the surveillance. This change will make the Unit 1 Specification more like the Standard Technical Specifications for Westinghouse Pressurized Water Reactors; NUREG-0452, Revision 4. We have concluded that this change constitutes a request for relief based upon demonstration of acceptable operation from an operating restriction. This demonstration is based upon the assumption that the criteria to be applied to this request for relief has been used to establish the same Specification in the Standard Technical Specifications for Westinghouse Pressurized Water Reactors; NUREG-0452, Revision 4. Since our conclusions are consistent with those published under the examples cited on page 14870 Vol. 48, No. 67 of the Federal Register, it is therefore our belief the proposed change will not constitute Significant Hazards Considerations as defined in 10 CFR 50.92.

The fourth proposed change is to revise ACTION STATEMENT Nos. 2, 6, and 7 for T/S 3/4.3 (INSTRUMENTATION), Table 3.3-1, on page 3/4 3-6 through 3/4 3-8. The reason for this change is to make the Unit No. 1 Specifications consistent with the Standard Technical Specifications for Westinghouse Pressurized Water Reactors; NUREG-0452,

Revision 4. Based on our review, we have concluded this change, as made in the attached revised T/S pages, constitutes a request for relief based upon demonstration of acceptable operation from an operating restriction. This demonstration is based upon the assumption that the criteria to be applied to this request for relief has been used to establish the same Specification in the Standard Technical Specifications for Westinghouse Pressurized Water Reactors; NUREG-0452, Revision 4. Since our conclusions are consistent with that published under the examples cited on page 14870 of Vol. 48, No. 67 of the Federal Register, it is therefore our belief that our proposed change will not constitute Significant Hazards Considerations as defined in 10 CFR 50.92.

The fifth proposed change is to correct ACTION STATEMENT 9 for T/S 3/4.3 (INSTRUMENTATION) to read "per Specification 4.3.1.1.1" instead of "per Specification 4.3.1.1." This change will make the Unit 1 Specification more like the Standard Technical Specifications for Westinghouse Pressurized Water Reactors; NUREG-0452, Revision 4. Based on our review, we have concluded that this change is a purely administrative change to the Technical Specifications. Since our conclusion is consistent with those published under the examples cited on page 14870 of Volume 48, No. 67 of the Federal Register, it is therefore our belief that the proposed change will not constitute Significant Hazards Considerations as defined in 10 CFR 50.92.

The sixth proposed change involves the "rod drop time" in Specification 4.10.1.2. It currently states " $\leq$ 1.8 seconds," and will be changed to " $\leq$ 2.4 seconds." In our May 11, 1983 letter, we proposed the same change for Specification 3.1.3.3. As indicated in that letter, we feel that this change does not involve a Significant Hazards Considerations as defined by 10 CFR 50.92.

The seventh proposed change is the correction of the Nuclear Enthalpy Hot Channel Factor ($F^N_{\Delta H}$) equation in T/S 3.2.3 to read " $\leq$ " instead of " = ." This change was addressed in our May 11, 1983 letter, however, we inadvertently used the wrong symbol. Since the change at this time is purely editorial in nature, we have concluded it does not constitute Significant Hazards Considerations as defined by 10 CFR 50.92.

The Attachment to this letter contains the proposed revised Technical Specification pages.

As required by 10 CFR 50.91 (b)(1), a copy of this entire application for a license amendment is being transmitted to the appropriate official of the State of Michigan.

Our letter No. AEP:NRC:0745A, dated February 7, 1983, transmitted the Class III fee levied by the NRC for the review of the Cycle 8 reloading for Unit No. 1. We consider the Technical Specification change requests contained in this letter to be part of that review and believe, therefore, that no fee is required by this submittal.

These proposed changes have been reviewed by the Plant Nuclear Safety Review Committee (PNSRC) and will be reviewed by the Nuclear Safety and Design Review Committee (NSDRC) at its next meeting.

This document has been prepared following Corporate Procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

M. P. Alexich
Vice President

MPA/os

cc: John E. Dolan
R. S. Hunter
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W. G. Smith, Jr. - Bridgman
R. C. Callen - State Representative
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