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 RECIP. NAME: DENTON, H.P. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to Licenses DPR-58 & DPR-74, changing
 Tech Spec Tables 3.3-3, 3.7.1.2 & 4.7.1.2.a & bases
 3/4.7.1.2 to address water density corrections when
 measuring auxiliary feedwater pump discharge pressure.

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April 23, 1985

AEP:NRC:0856H

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
APPLICATION FOR AMENDMENT TO TECHNICAL SPECIFICATIONS
AUXILIARY FEEDWATER PUMPS

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 constitute an application for amendment to the subject Technical Specifications (T/S) for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2. Specifically, we propose to change T/S Table 3.3-3, T/S 3.7.1.2, T/S 4.7.1.2.a, and the Bases 3/4.7.1.2. Proposed revised T/S pages are contained in the Attachment to this letter. This letter constitutes our response to the concerns of Generic Letter 83-37, Section 3, "Long Term Auxiliary Feedwater System Evaluation." In addition, the specified action in Mr. Steven A. Varga letter dated April 11, 1985 is addressed in this proposal. Specifically, we are proposing that the Technical Specification and the Bases be changed to address water density corrections when measuring auxiliary feedwater pump discharge pressure.

The change to Table 3.3-3 for both Units 1 and 2 would delete the requirement that the Motor Driven Auxiliary Feedwater Pumps (MDAFP) be automatically started in MODE 3 due to a loss of main feedwater pump signal. Currently, during normal plant startup, the main feedwater pumps are not running when entering MODE 3. Thus, the "loss of main feedwater pumps" instrumentation trip logic now automatically starts the MDAFP even though delivery of auxiliary feedwater to the steam generators is not required. When water is required, it is usually added slowly at the direction of the operator. This change will make the automatic initiating signals required in MODE 3 consistent with those identified in the Westinghouse Standard Technical Specifications (STS), NUREG-0452, Revision 4 (i.e., steam generator water level--low-low, 4 kv bus loss of voltage, and safety injection). The removal of the loss of main feedwater initiating signal may result in some increase to the probability or consequence of a previously analyzed accident, or may reduce in some way a safety margin, but the results of this change are clearly within all acceptable criteria with respect to the system specified in the STS. For this reason, we believe that this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

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A section is added to the Bases for T/S 3/4.7.1.2 that describes the dual function of the AFW System and its interrelation with the automatic initialing signals. This change is consistent with the changes to Table 3.3-3 and T/S 3.7.1.2. In addition, the word "of" was inserted in the phrase "will be limited to a small fraction of 10 CFR Part 100" to the Unit 1 Bases 3/4.7.1.4. This editorial change makes the Unit 1 Bases identical to the respective Unit 2 Bases.

The Action statement of T/S 3.7.1.2 for Units 1 and 2 are proposed to be made identical to that specified in the Westinghouse STS. This change will address the ACTION to be taken if more than one auxiliary feedwater pump is inoperable. This change was recommended in Generic Letter 83-37. This change constitutes an additional restriction not presently included in the T/S. Therefore, we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

The term "independent" is proposed to be added to Unit 2 T/S 3.7.1.2. This change would make this Unit 2 T/S identical to the Unit 1 T/S and the Westinghouse STS. This change would be purely administrative and therefore does not involve a significant hazards consideration as defined by 10 CFR 50.92.

Changes are proposed to T/S 4.7.1.2.a.1 and T/S 4.7.1.2.a.2 to make the Units 1 and 2 T/S identical and to clarify that the acceptance discharge pressures are based on a fluid temperature of 60°F. Commensurately, we are proposing that the Bases Section B 3/4.7.1.2 be changed to include the following clarification for discharge pressure. "The acceptance discharge pressures for the auxiliary feedwater pumps are based on a fluid temperature of 60°F. Water density corrections are permitted to allow comparison of test results which vary depending on ambient conditions." The addition of this phrase clarifies that a correction for water density is permitted when testing the auxiliary feedwater pumps. Allowance for this density correction permits accurate comparison of test results which vary depending on ambient conditions. These changes may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but the results of the changes are clearly within all acceptable criteria with respect to the safety analysis. Therefore, we believe these changes do not involve a significant hazards consideration as defined by 10 CFR 50.92.

T/S 4.7.1.2.a.3 in both Units 1 and 2 is changed to agree with the Westinghouse STS. This change will remove several surveillances including some that were redundant to those covered in T/S 4.7.1.2.a.4. This change may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the STS. Therefore, we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

T/S 4.7.1.2.a.4 for both Units 1 and 2 is to be replaced by the following:

Verifying that when above 10% RATED THERMAL POWER each automatic valve in the flow path is in the fully open position and that each auxiliary feedwater pump is in automatic control (capable of automatic actuation).

This change allows the valves to be partially or fully closed when the plant is operating below 10% RATED THERMAL POWER. This reflects our belief that the fully open position is not always the correct position for the valves. At various times, particularly during startup and also during accident conditions, it is appropriate to run the auxiliary feedwater pumps and regulate the flow by adjusting the valves. It should be noted that whatever position the valves are in, an initiating signal to the auxiliary feedwater pumps will move the valves to the fully open position. This change may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but the results of the change are clearly within all acceptable criteria with respect to the safety analysis. Therefore, we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

We believe that the proposed changes will not result in (1) a significant change in the types of effluents or a significant increase in the amounts of any effluent that may be released offsite, and (2) a significant increase in individual or cumulative occupational radiation exposure.

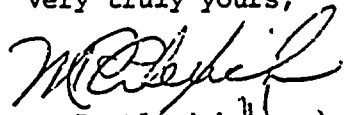
These proposed changes have been reviewed by the Plant Nuclear Safety Review Committee (PNSRC) and will be reviewed by the Nuclear Safety and Design Review Committee (NSDR) at their next regularly scheduled meeting.

Pursuant to 10 CFR 50.91(b)(1), copies of this letter and its attachment have been transmitted to Mr. R. C. Callen of the Michigan Public Service Commission and Mr. G. Bruchmann of the Michigan Department of Public Health.

Pursuant to 10 CFR 170.12(c), we have enclosed an application fee of \$150.00 for the proposed amendments.

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 4/23/95

cm

Attachments

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman