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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana &
 AUTH. NAME: ALEXICH, M.P. AUTHOR AFFILIATION: Indiana & Michigan Electric Co.
 RECIP. NAME: DENTON, H.R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to License DPR-58, changing Tech Spec Tables 2.2-1, 3.2.-1 & 3.3-3 to accomodate use of Rdf resistance temp devices w/error in calibr allowance. Fee paid.

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INDIANA & MICHIGAN ELECTRIC COMPANY

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July 30, 1985
AEP:NRC:0942A

Donald C. Cook Nuclear Plant Unit No. 1
Docket No. 50-315
License No. DPR-58
APPLICATION FOR AMENDMENT TO TECHNICAL SPECIFICATION
Tables 2.2-1, 3.2-1 and 3.3-3 (RdF RTDs)

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 Technical Specifications (T/S) for the Donald C. Cook Nuclear Plant Unit No. 1. Approval of the proposed amendment is requested to accommodate startup of Unit 1 which is currently scheduled for initial criticality on August 18, 1985. These Technical Specifications will have to be in place at least two days before this date so we can proceed with certain tests prior to the initial criticality of Cycle 9. This letter proposes changes to T/S Table 2.2-1 Functional Unit 7, Functional Unit 8, and Functional Unit 12; Notes associated with Table 2.2-1; Table 3.2-1, Limits for Reactor Coolant System Temperature (T_{avg}); and Table 3.3-3 and associated footnotes.

Westinghouse Electric Corporation notified us on May 2, 1985 that they had found an error in their calibration allowance for RTDs manufactured by RdF. We have been informed that they also notified you of this change in their letter dated May 6, 1985. As you were informed in that letter, the calibration performed by RdF was not compatible with Westinghouse instrument uncertainty assumed in the analysis. Westinghouse is currently evaluating the impact, if any, of the calibration error on the Unit 1 safety analyses.

The proposed changes would accommodate the use of any of 16 RdF Resistance Temperature Devices (RTDs) in Unit 1 with this new error. Two of the RdF RTDs are already installed in Unit 1 as spares. The remaining 14 RTD are being installed during the current refueling outage as replacements for Rosemount manufactured RTDs.

As indicated by the attached proposed T/S pages, the RTDs are used for temperature input to Overtemperature ΔT , Overpower ΔT , Loss of Flow, DNB protection, and T_{avg} low-low Essential Safety Features (ESF) Actuation.

Contingent upon Westinghouse completing the above evaluation, we have identified the attached T/S pages that will be affected by the change in RTDs. The attached T/S pages have been marked with brackets, [], to identify where numbers may change as a result of the Westinghouse evaluation. The new numbers and their justification will be forwarded to the NRC when received from Westinghouse.

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With regard to the changes other than those associated with Table 3.3-3 we believe the Westinghouse evaluation will result in changes to accommodate the new instrument uncertainty, but will not change the results of the analysis itself. The changes associated with Table 3.3-3 are to allow the startup of Unit 1 to continue during the time calibration data from the RdF RTDs is being evaluated. The proposed change will delete, only at the beginning of the cycle, the requirement that the narrow range T_{avg} low-low ESF actuation signal be operational above the P-12 permissive. During this time, the T_{avg} safety signals associated with Table 3.3-3 will be placed in the tripped condition. This will assure that the associated safety functions will be accomplished if necessary. Since we are not changing the results of the analysis, we believe these changes will not involve a significant hazards consideration as defined by 10 CFR 50.92.

We believe that the proposed change 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. Should our review of the results of the Westinghouse evaluations conclude otherwise, we will so notify you.

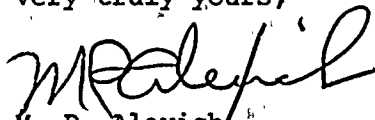
These proposed changes will be reviewed by the Plant Nuclear Safety Review Committee and the Nuclear Safety and Design Review Committee upon receipt of the results of the Westinghouse evaluation.

In compliance with the requirements of 10 CFR 50.91(b)(1), a copy of this letter and its attachment has 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.

In order to expedite this letter Corporate review procedures have not been fully completed. Upon completion of those procedures we will notify you of any changes to this application that are required.

Very truly yours,


M. P. Alexich
Vice President

cm

Attachments

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

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Washington, D.C.

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