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 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Application for amend to License DPR-58, revising Tech Specs to reflect ASME Code Section XI edition change to inservice insp/inservice testing program.

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INDIANA & MICHIGAN ELECTRIC COMPANY

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July 3, 1986
AEP:NRC:0433L

Donald C. Cook Nuclear Plant Unit No. 1
Docket Nos. 50-315
License Nos. DPR-58
TECHNICAL SPECIFICATIONS CHANGE TO INCORPORATE
REVISED INSERVICE INSPECTION/TESTING PROGRAM

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 attachments constitute an application for amendment to the Technical Specifications (T/Ss) for the Donald C. Cook Nuclear Plant Unit No. 1. Specifically, we are proposing to revise T/Ss 4.4.3, 4.4.9.3, 4.6.2.2, 4.7.1.1 and 4.7.1.5 to reflect the ASME code Section XI edition change to our Inservice Inspection/Inservice Testing (ISI/IST) program. The reasons for the proposed change and our analysis concerning significant hazards considerations are contained in Attachment 1 to this letter. The proposed revised Technical Specification pages are contained in Attachment 2.

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 amount of any effluent that may be released offsite, or (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 (NSDRC) at their next regularly scheduled meeting.

In compliance with the requirements of 10 CFR 50.91(b)(1), copies of this letter and its attachments 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.

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Mr. Harold R. Denton

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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^{98/5}
Vice President 7/2/26

MPA/rn

Attachments

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

ATTACHMENT 1 TO AEP:NRC:0433L
REASONS AND 10 CFR 50.92 ANALYSIS FOR
CHANGE TO THE
DONALD C. COOK NUCLEAR PLANT UNIT NO. 1
TECHNICAL SPECIFICATIONS

Affected Pages

Unit 1 page nos. 3/4 4-5, 3/4 4-32, 3/4 6-12, 3/4 7-1 and 3/4 7-10

The following changes are requested to make our Unit 1 T/S surveillances consistent with our ISI/IST program. As required by 10 CFR 50.55a, D. C. Cook is updating its surveillance program to the standards set out in the ASME Boiler and Pressure Vessel Code Section XI (ASME Code), 1983 edition (including addendum summer 1983). Three Unit 1 T/Ss, 4.4.3, 4.4.9.3 and 4.7.1.1, reference the 1974 edition of the ASME code. We request that these references be deleted and replaced by a reference to Section 4.0.5 of the Technical Specification.

Unit 1 T/S 4.7.1.5 currently reflects the surveillance requirements of the ISI/IST Program; however, we request that this reference also be changed to the Unit 2 T/S format for consistency.

In addition, we request that Unit 1 T/S 4.6.2.2 be changed to the Unit 2 format. This change is consistent with those requested in our letters AEP:NRC:0433 (dated May 10, 1983) and AEP:NRC:0433K (dated June 20, 1986), in that the specific surveillance requirements for power operated and automatic valve testing are deleted and the Technical Specifications wording is made similar to the Unit 2 T/S. These surveillances are included in our ISI/IST program in accordance with the 1983 edition of the ASME code.

Per 10 CFR 50.92, a proposed amendment will not involve a significant hazards consideration if the proposed amendment does not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated,
- (2) create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated, or
- (3) involve a significant reduction in a margin of safety.

Criterion 1

The purpose of the changes requested in this letter is to update the Unit 1 T/S surveillances to the 1983 edition of the ASME code, and to make them consistent with the currently approved Unit 2 T/Ss. The requirements of both the ASME code and the Unit 2 T/Ss have previously been found acceptable. No relevant D. C. Cook Unit 1 specific parameters differ significantly from Unit 2. Therefore we believe these changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The changes to the Unit 1 T/Ss to incorporate the 1983 edition of the ASME code and to make the surveillances identical to the Unit 2 T/Ss will not create a condition that has not been previously analyzed. Therefore we do not believe that this change will create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

These changes to the Unit 1 T/Ss will maintain the level of safety previously approved for Unit 2. Therefore we believe this change will not involve a significant reduction in a margin of safety.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The first of these examples refers to changes that are administrative in nature: for example, changes to achieve consistency throughout the T/Ss, correction of an error, or a change in nomenclature. The proposed T/S changes are to achieve consistency between the Unit 1 and Unit 2 T/Ss and the latest revision of the ASME code. Therefore we believe that the Federal Register example cited is applicable and that these changes do not involve a significant hazards consideration as defined by 10 CFR 50.92.

ATTACHMENT 2 TO AEP:NRC:0433L
REVISED PAGES FOR THE
DONALD C. COOK NUCLEAR PLANT UNIT NO. 1
TECHNICAL SPECIFICATIONS