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 DENTON, H. R.      Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Application for amend to Licenses DPR-58 & DPR-74, correcting editorial errors. Fee paid.

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# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
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August 19, 1986

AEP:NRG:0931

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
SNUBBER TECHNICAL SPECIFICATION CHANGE REQUEST

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 Nos. 1 and 2. Specifically we are proposing a change to T/S 3/4.7.8, "Snubbers." This change corrects a number of editorial errors that exist in our current T/Ss. 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 amounts of any effluents that may be released off-site, 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 regular meeting.

In compliance with the requirements of 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.

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Very truly yours,



M. P. Alexich  
Vice President

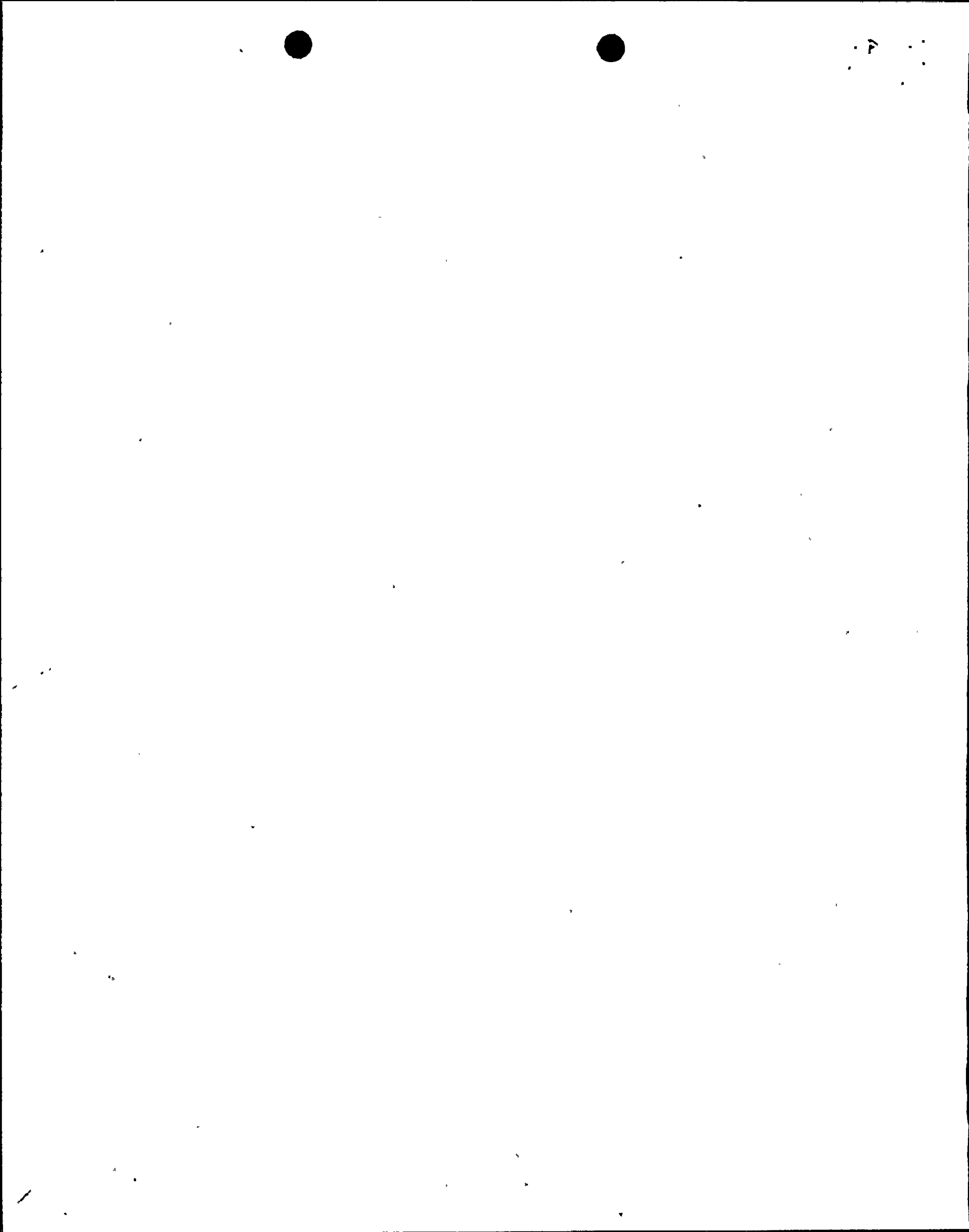
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Attachments

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:0931  
REASONS AND 10 CFR 50.92 ANALYSIS FOR  
CHANGE TO THE  
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2  
TECHNICAL SPECIFICATIONS



The purpose of this T/S change is to correct a number of errors that exist in the snubber T/Ss. The changes requested are as follows:

Unit 1

1. Page 3/4 7-28. The phrase "the second inservice visual inspection" was added to T/S 4.7.8. This phrase is needed to make the sentence meaningful and grammatically correct. These words are also consistent with the Unit 2 T/Ss and the Westinghouse Standard Technical Specifications (STS) (NUREG-0452, Revision 4). Also on this page, the "±25" under the Subsequent Visual Inspection Period was changed to "plus margin of 25%." This change reflects our belief that the purpose of the margin interval is to allow additional time for flexibility in performing surveillances similar to T/S 4.0.2 and not to prevent the surveillances from being performed earlier than 25% before the stated interval. We recognize that surveillances performed sooner than 25% before the stated interval cannot be used to lengthen the surveillance interval (as stated in the bases).
2. Page 3/4 7-29. A closing parenthesis was moved from the end of the paragraph to after the number "(10%)," four lines above. This typographical error distorted the meaning of the sentence. Also on this page the parenthetical phrase "(nearest the valve operator)" was added. This phrase clarifies which fluid port is used to determine the operability of the snubbers. This change does not impact the requirements of the currently approved T/S surveillance requirement.
3. Page 3/4 7-30. The word "efficiency" was replaced with the word "deficiency," which is clearly intended. Also on this page, the word "and" was deleted. This wording is consistent with the Unit 2 T/S and the STS.
4. Page 3/4 7-36 Table 3.7-4. Snubber 46 was inadvertently classified "accessible." Snubber 46 is located inside containment between steam generator Nos. 1 and 4, which is a high-radiation area and should be classified "inaccessible" due to ALARA concerns.
5. Page 3/4 7-38. Snubber 67 was erroneously referenced as being in the East RHR pump room. This snubber is located in the West RHR pump room. The T/S location reference has been changed to reflect this.
6. Page B 3/4 7-6. Two changes were made to the snubber Bases. The word "or" replaced the "of" and the word "manufacturer's" replaced the word "manufactured." We believe these were typographical errors made in Amendment 53 or before. The requested wording is consistent with the STS.



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Unit 2

1. Page 3/4 7-20. The word "not" was added to footnote \*. The wording is consistent with the Unit 1 T/S and the STS. Also the reference to specification "4.7.7.1c" was corrected to "4.7.7.1.c." Also on this page, the "+25" under the Subsequent Visual Inspection Period was changed to "plus a margin of 25%." This change reflects our belief that the purpose of the margin interval is to allow additional time for flexibility in performing surveillances similar to T/S 4.0.2 and not to prevent the surveillances from being performed earlier than 25% before the stated interval. This change was also requested for Unit 1.
2. Page 3/4 7-21. A closing parenthesis was moved from the end of the paragraph to after the number "(10%)," four lines above. Also on this page the parenthetical phrase "(nearest the valve operator)" was added. This phrase clarifies which fluid port is used to determine the operability of the snubbers. This change does not impact the requirements of the currently approved T/S surveillance requirement. These changes are also requested for Unit 1.
3. Pages 3/4 7-27 and 7-29 Table 3.7-9. Snubbers 41, 42, 43, 44, 45 and 63 were reclassified as "accessible." These snubbers are located in the Annulus, which is accessible during power operation.
4. Page 3/4 7-28 Table 3.7-9. Snubbers 54, 55 and 56 have been reclassified as "inaccessible." These snubbers are located inside containment in the reactor coolant pump area. This area is a high-radiation area, and therefore these snubbers are inaccessible due to ALARA concerns.
5. Page 3/4 7-29 Table 3.7-9. Snubber 62 was reclassified as "inaccessible." The location of this snubber was erroneously stated as in the Annulus. This snubber is actually located inside the crane wall in the reactor coolant pump area. This area is a high-radiation area and therefore this snubber is inaccessible due to ALARA concerns.
6. Page 3/4 7-32 Table 3.7-9. Snubbers 85 and 86 were incorrectly referenced as being located inside the leak detector box, pipe chase. These snubbers are in fact located in the West containment spray pump room. In addition, the letter "S" was added to correct the Hanger Mark No. for Snubber 86.
7. Pages B 3/4 7-5 and 7-6. Two changes were made to the snubber Bases. The word "or" replaced the word "of," and the word "manufacturer's" replaced the word "manufactured." These changes are also requested for Unit 1.

Changes 1, 2, 3, and 6 for Unit 1 and changes 1, 2, and 7 for Unit 2 are purely editorial in nature. These changes correct typographical errors, misspellings, and other proofreading oversights. Changes 4 for Unit 1 and 3, 4, and 5 for Unit 2 change the classification (accessible or inaccessible) of various snubbers. These snubbers are being reclassified because of errors in the references to their location or the accessibility of their locations. This change affects only whether the snubber is tested

during power operation or shutdown; it does not affect the frequency of the surveillance. Changes 5 for Unit 1 and 6 for Unit 2 merely correct the location description given in the T/S. These changes will not impact the equipment itself or degrade its surveillance and maintenance programs.

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.
- (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14780) of amendments considered not likely to involve significant hazards considerations. The first example is that of a purely administrative change to the T/Ss: for example, a change to achieve consistency throughout the T/Ss, correction of an error, or a change in nomenclature. We believe that the changes requested in this letter are of the type specified in the example. Since these changes are administrative in nature, they do not reduce a margin of safety, do not increase the probability or consequences of a previously analyzed accident, and do not introduce the possibility of a new accident. Therefore, we believe these changes do not involve a significant hazards consideration as defined by 10 CFR 50.92.

