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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 making Tech Specs consistent w/NUREG-0452, Rev 4, verifying quadrant power tilt ratio limits once per hour for 12 h or until verified acceptable at 95% or greater rated thermal power. Fee paid.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

December 5, 1986
AEP:NRC:1015

Donald C. Cook Nuclear Plant Unit No. 1
Docket No. 50-315
License No. DPR-58
PROPOSED TECHNICAL SPECIFICATION CHANGE FOR
QUADRANT POWER TILT RATIO

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 propose a change to the Action Statement of T/S 3.2.4. A description of the proposed change, our reasons for requesting the proposed change, and an analysis concerning significant hazards considerations are included in Attachment 1. The proposed revised T/S 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 effluent that may be released offsite, or (2) a significant increase in individual or cumulative occupational radiation exposure.

The proposed change has been reviewed by the Plant Nuclear Safety Review Committee (PNSRC) and will be reviewed by the Nuclear Safety and Design Review Committee (NSDRG) at their next regularly scheduled meeting. Should their review in any way change this submittal, we will notify you promptly.

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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2. The second part is a description of the vegetation.

3. The third part is a description of the soil.

4. The fourth part is a description of the climate.

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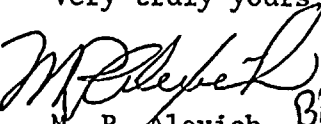
11. The eleventh part is a description of the economy.

12. The twelfth part is a description of the culture.

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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 BRS
Vice President 12/5/86

cm

Attachments

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

ATTACHMENT NO. 1 TO AEP:NRC:1015

DONALD G. COOK NUCLEAR PLANT UNIT NO. 1

REASONS AND 10 CFR 50.92

ANALYSIS FOR PROPOSED TECHNICAL SPECIFICATION CHANGE

DESCRIPTION OF PROPOSED CHANGE

Action statements a.3, b.3, and c.2 for T/S 3.2.4 for Unit 1 require that the Quadrant Power Tilt Ratio (QPTR) be verified within its limits at least once per hour until verified acceptable at 95% or greater rated thermal power. The proposed change would make the Unit 1 Technical Specification (T/S) consistent with the Unit 2 T/S and the Westinghouse Standard Technical Specifications (STS) (NUREG-0452, Rev. 4), both of which require that the QPTR be verified within its limits at least once per hour for twelve hours or until verified acceptable at 95% or greater rated thermal power.

REASONS FOR REQUEST

We have administratively limited Unit 1 to 90% of its rated thermal power. If a problem with the QPTR were to arise which required entry into the action statement of T/S 3.2.4, the administrative power level would have to be exceeded in order to permit a cessation of the hourly QPTR verifications. In addition, the change we are proposing is consistent with the Unit 2 T/Ss and the STS. Therefore, the reasons for the proposed change are as follows:

- 1) to permit the cessation of hourly QPTR verifications without having to exceed the administratively set thermal power level, and
- 2) to make the Unit 1 T/Ss consistent with the Unit 2 T/Ss and the STS.

JUSTIFICATION OF THE PROPOSED CHANGE

Unit 1 was the pilot plant for the STS, and the Unit 1 T/Ss were issued before Rev. 0 of the STS was published. By the time Rev. 0 was issued, it was recognized that verifying that the QPTR is within its limit once per hour for 12 hours is sufficient to ensure that an undesirable QPTR condition no longer exists and that power does not have to be greater than 95% to do this verification. Unit 2 T/Ss were based on a later version of the STS and therefore include the 12-hour verification period. We believe this change is justified because it is consistent with the previously approved Unit 2 T/S and STS.

ANALYSIS OF SIGNIFICANT HAZARDS

Per 10 CFR 50.92, a proposed amendment will involve a no 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.

An analysis of each of these criteria is given below.

CRITERION 1

The 12-hour period is consistent with positions previously found acceptable by the NRC for our Unit 2 T/Ss and the STS. For these reasons, we believe that any increase in the probability or consequences of an accident previously evaluated would not be significant.

CRITERION 2

Since this change is consistent with the Unit 2 T/Ss and the STS and introduces no new operating conditions, we believe that this change will not create the possibility of a new or different kind of accident from any previously evaluated.

CRITERION 3

This change retains the margin of safety currently approved for Unit 2 and recommended in the STS. For this reason and the reasons given in Criterion 1, we believe that any reduction in the margin of safety would not be significant.

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 purely administrative in nature: for example, changes to achieve consistency throughout the technical specifications, correction of an error, or change in nomenclature. The proposed change is like this example in that it is intended to correct an error in the Unit 1 T/Ss which was corrected by the time the Unit 2 T/Ss were issued. In addition, this change is needed to comply with an administrative limit which enhances the safe operation of the plant. It is also intended to achieve consistency between the Unit 1 T/Ss, the Unit 2 T/Ss and the STS. This change is also similar to the sixth example, which refers to changes that may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but where the results are clearly within limits established as acceptable. We believe that this change is clearly within the limits since it was approved for the Unit 2 T/S and the STS. Based on the above we believe this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

ATTACHMENT NO. 2 TO AEP:NRC:1015

DONALD C. COOK NUCLEAR PLANT UNIT NO. 1

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS