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SUBJECT: Application for amend to License DPR-74, changing ice condenser Tech Specs that would allow util to weigh ice baskets in Row 8 in place of certain Row 9 baskets. Fee paid.
SEE PROPOSED CHANGES TO TECH SPECS.

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March 30, 1987
AEP:NRC:0900E

Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316
License No. DPR-74
ICE CONDENSER ICE BASKET WEIGHING
EMERGENCY TECHNICAL SPECIFICATIONS CHANGE REQUEST

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Attn: H. R. Denton

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. 2. Specifically, we are requesting a one-time change to the ice condenser T/Ss that would allow us to weigh ice baskets in Row 8 in place of certain Row 9 baskets that we have been unable to weigh. This change is requested to allow us to restart Unit 2 if we are unable to weigh the required baskets by the time we are ready to enter Mode 4. The reasons for the proposed change and our analyses concerning significant hazards considerations are contained in Attachment 1 to this letter. The proposed revised Technical Specification page is contained in Attachment 2. A summary of our statistical evaluation is included in Attachment 3.

D. C. Cook Nuclear Plant Unit No. 2 is currently in an unscheduled outage to repair steam generator tubes. The ice condenser surveillances were done during this forced outage to prevent having to shut down when the ice condenser surveillance for ice basket weighing would come due on April 19, 1987. When we decided to perform the ice weighing surveillance we had not anticipated any problems with weighing the required baskets or the need to refill ice baskets. Currently we are planning to enter Mode 4 on or about April 8, 1987 and resume power operation on or about April 12, 1987.

This change is needed on an emergency basis because we have not been able to weigh all of the required ice baskets from Row 9. We have so far been able to free and weigh all the required ice baskets in Row 9 except for three in Groups 1 and 2 (Bays 1 through 16). All the required baskets in Group 3 (Bays 17 through 24) have been weighed. Row 9 ice baskets are located closest to the crane wall and are frequently difficult to weigh because they become frozen in place. We have made every reasonable effort

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to free the Row 9 baskets, including defrosting the ice condenser, heating the outside of the baskets with hot glycol, attempting to mechanically free the baskets, and heating the lattice structure. While we have been able to weigh twenty-five Row 9 baskets using these methods, we have not been able to weigh three of the required Row 9 baskets. Therefore, we cannot demonstrate the operability of the ice condenser established by the T/S surveillance requirements and cannot return to power operation on a timely basis without the requested relief.

Although we have had difficulty in weighing baskets in Row 9 previously, we have always been able to weigh the required number of baskets. In this case, we have been attempting to free the required baskets since March 10, 1987, which is the longest period of time our baskets have presented this difficulty.

In deciding to make this request, we considered the alternative of emptying the Row 9 Group 1 and 2 baskets and refilling them. This process would delay our return to power by about twenty-five days. Each day of power operation that is delayed will result in approximately an additional $195,000 increased fuel cost. We believe that having to delay return to power for approximately twenty-five days in order to refill the Row 9 baskets would create an unnecessary burden on our ratepayers.

We will continue to try to weigh the three remaining Row 9 baskets, selected as part of the representative sample for this surveillance, until as close as possible to final containment clean-up prior to entry into Mode 4 on or about April 8, 1987. We request this T/S change on a contingency basis, in the event that we are unable to weigh these baskets. We propose that the weighing of one Row 8 basket in the same bay will be an acceptable substitute for the weighing of each of the three stuck Row 9 baskets. We will also weigh ice baskets in Rows 2, 4, 6, and 8 in Groups 1 and 2 approximately four months after we return to power. We request that you review this T/S change by April 6, 1987 so that we may proceed with the startup of Unit 2 on schedule. For the reasons discussed in Attachment 1, we believe that our inability to weigh three baskets in Row 9 and substituting three baskets in Row 8 does not constitute a significant hazard as defined in 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 release 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.

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

cm

Attachments

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

ATTACHMENT 1 TO AEP:NRC:0900E

REASONS AND 10 CFR 50.92 ANALYSES FOR

CHANGES TO THE

DONALD C. COOK NUCLEAR PLANT UNIT NO. 2

TECHNICAL SPECIFICATIONS

The purpose of this T/S change is to allow a one-time exemption from T/S 4.6.5.1.b.2. This T/S requires us to weigh, at nine-month intervals, one basket in Rows 1, 2, 4, 6, 8, and 9 for each bay. Despite all efforts made, we have been unable to weigh one Row 9 basket for Group 1 and two Row 9 baskets for Group 2.

We propose to add a footnote to Unit 2 T/S page 3/4 6-36 that states: "On a one-time basis during the March/April 1987 outage, the weights of three Row 8 baskets may be substituted for three adjacent Row 9 baskets." This change would allow us to start up Unit 2 on its current schedule without delay.

Table 1 shows the latest measured ice basket weights for Unit 2 Row 9 for Groups 1 and 2. It is of note that the baskets we cannot free appear to contain the same amount of ice as those that we have weighed. As can be seen on Table 1, all of the Row 9 baskets that we could weigh contained over the 1220 lb/basket minimum required by T/Ss. Table 2 shows that the average ice weight for these baskets in Row 9 is 1382 lbs., well over the 1220 lb/basket minimum required by T/S. The table also shows the average weights for the baskets in Row 8. Individual group weights are also provided in that table. We have evaluated the basket weights taken in Rows 8 and 9 (see Attachment 3). As discussed in Attachment 3, the average weights in Row 8 (1378 lbs.) are very similar to those in Row 9 (1382 lbs.). Therefore, as a compensatory measure for those baskets in Row 9 that we cannot weigh, we will weigh the appropriate baskets in Row 8. We believe that the weights of the Row 8 baskets will give us an indication of the acceptability of the weights of the Row 9 baskets.

As an additional measure, as discussed with the NRC staff, we will reweigh ice baskets in Rows 2, 4, 6, and 8 approximately four months after return to power. The weighing will be performed for one basket each from Rows 2, 4, 6, and 8 in each bay. Should any basket in a bay have an ice weight less than 1220 lbs., an additional sixteen baskets will also be selected from Rows 2, 4, 6, and 8 in the same bay. We believe this extra ice-weighing will confirm that issuance of this T/S change does not constitute a significant hazard as defined in 10 CFR 50.92.

10 CFR 50.92 Criteria

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 analyzed,

(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.

Our evaluation of the proposed change with respect to these criteria is provided below.

Criterion 1

Based on the discussion above, we believe that the ice condenser is capable of performing its safety function. This conclusion is based on current data and our statistical evaluations, which are discussed in Attachment 3. We believe the compensatory actions, weighing the Row 8 baskets and the additional ice weighing of Rows 2, 4, 6, and 8, adequately demonstrate that the ice condenser will continue to be operable until the next refueling outage, which is scheduled to begin in the early part of 1988. Therefore, we believe that this change will not involve a significant increase in the probability or consequences of an accident previously analyzed, nor will it involve a significant reduction in a margin of safety.

Criterion 2

The surveillance exemption will not result in a change in plant configuration or operation. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

Criterion 3

We believe that the exemption from this surveillance requirement will not result in a significant reduction in a margin of safety, for the reasons given in Criterion 1.

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 a significant hazards consideration. The sixth of these examples refers to changes that may result in some increase to the probability of occurrence or consequences of a previously analyzed accident, but the results of which are within limits established as acceptable. We believe this change falls within the scope of this example, for the reasons previously cited. Therefore, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

Table 1

Row 9 Ice Weights for Groups 1 and 2 (lbs/basket) (March 1987)

Bay	Azimuthal Row	Ice Weight
1	2	1399
1	3	1398
5	7	1393
5	8	1466
6	3	1470
7	2	1266
8	8	1307
9	4	1398
9	6	1238
10	2	1594
10	3	1298
13	4	1572
13	6	1469

Table 2

Ice Weights (March 1987)

Row	Group	Sample Size	Average Weight lbs/Basket	Lower Limit at a 95% Confidence Level lbs/Basket
8	1	13	1421	1396
8	2	8	1373	1348
8	3	16	1339	1319
8	All	37	1378	1365
9	1	7	1386	1333
9	2	6	1428	1315
9	3	12	1331	1295
9	All	25	1382	1342

ATTACHMENT 2 TO AEP:NRC:0900E

PROPOSED CHANGES TO THE

DONALD C. COOK NUCLEAR PLANT UNIT NO. 2

TECHNICAL SPECIFICATIONS