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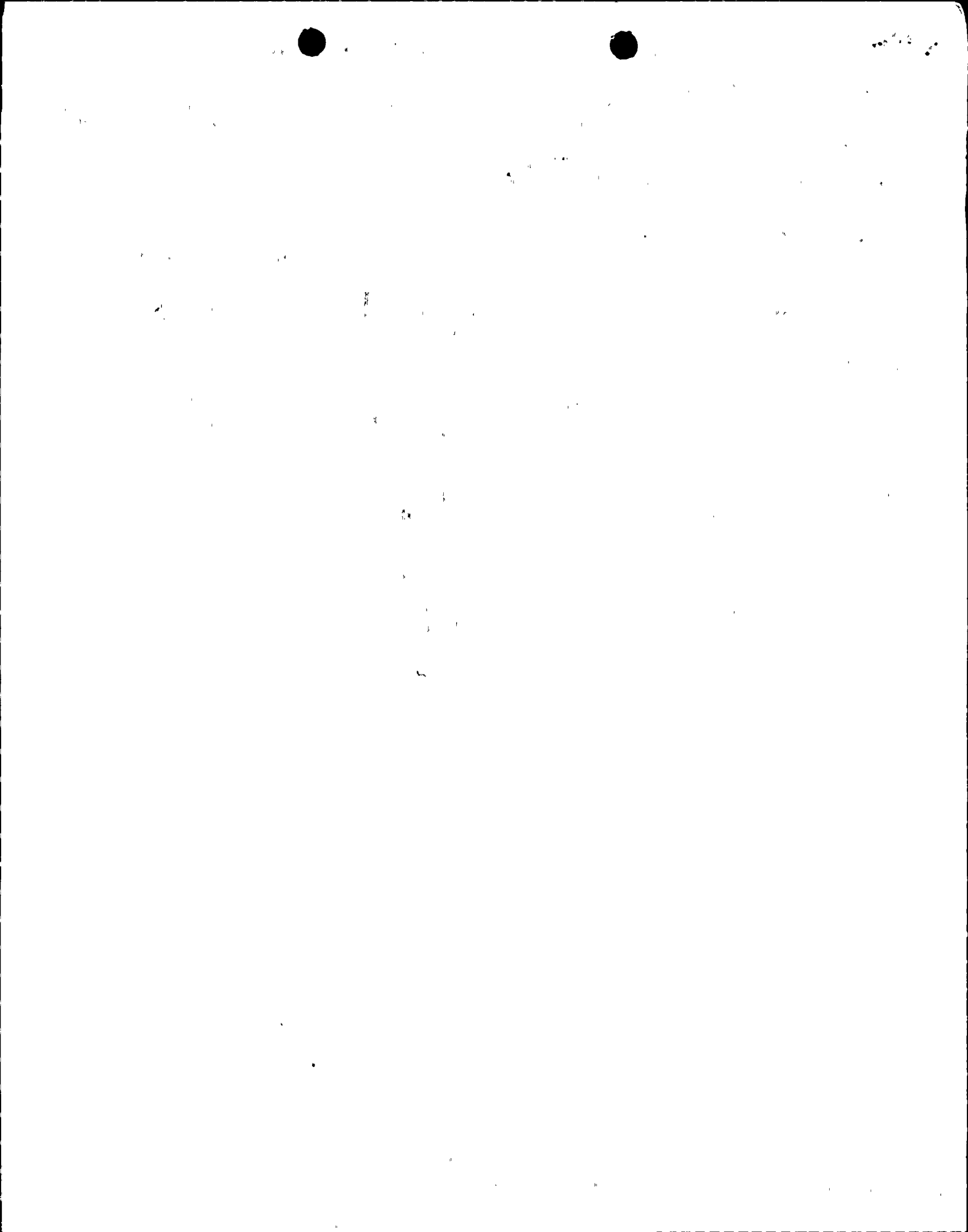
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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME AUTHOR AFFILIATION
 ALEXICH, M. P. Indiana & Michigan Power Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: Amend to application for revising Tech Specs re mod to
 surveillance requirements concerning diesel generator fuel
 oil testing.

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Indiana Michigan
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September 28, 1987
AEP:NRC:0896G

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
REVISION OF T/S CHANGE REQUEST ON
DIESEL GENERATOR FUEL OIL

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

Attn: T. E. Murley

Dear Dr. Murley:

Pursuant to discussions with your staff, we are submitting this letter as a change to our previous application for amendment to the Technical Specifications (T/Ss) for the Donald C. Cook Nuclear Plant Units 1 and 2. Specifically, we are proposing to modify the surveillance requirements of T/S 3/4.8.1 with regard to diesel generator fuel oil testing. In our letter AEP:NRC:0896B, dated January 16, 1987, we submitted proposed changes to our diesel generator T/Ss which were intended to maintain and improve diesel generator reliability. During a subsequent conversation, your staff requested that we submit additional changes to address diesel fuel oil surveillance requirements. In AEP:NRC:0896F, dated June 25, 1987, we submitted proposed T/S changes to address the concerns of your staff regarding diesel fuel oil requirements. Your staff reviewed our submittal and identified the following two concerns.

The first concern involved the fact that we had not proposed any surveillance requirements to address cleaning of the storage tanks. Since emptying the tanks to clean them would require that both units be shut down at the same time, we suggested an alternative method of cleaning in which the fuel oil is agitated in the storage tank while it is being pumped from the bottom of the tank through a filter and back into the opposite end of the tank. This method allows the required amount of fuel oil to be maintained in the storage tank, thereby allowing the diesel generators to remain operable during the cleaning operation. Attachment 3 contains a flow diagram showing the diesel fuel oil tanks and a description of why emptying the tanks to clean them would require a dual unit shutdown.

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The second concern involved the fact that we were allowing 31 days to receive the results of the offsite laboratory tests performed on new fuel oil, as opposed to 14 days as suggested by Regulatory Guide 1.137.

To address this second concern, we have decided to adopt the 14-day requirement. We are therefore proposing that the offsite lab tests be completed within 14 days.

In addition, we are proposing to replace the water and sediment test with the clear and bright test and to make several editorial changes.

A detailed description of the proposed changes and our analysis of significant hazards considerations are included in Attachment 1. The proposed revised T/S pages are included in Attachment 2 and are intended to supersede the corresponding T/S pages submitted with AEP:NRC:0896B and AEP:NRC:0896F. Specifically, pages 3/4 8-3, 3/4 8-4, 3/4 8-5, 3/4 8-5a, B 3/4 8-1, and B 3/4 8-2 are intended to replace pages 3/4 8-3, 3/4 8-4, 3/4 8-5, B 3/4 8-1 and B 3/4 8-2 in the earlier submittals.

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.

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.

This submittal supplements our earlier diesel generator T/S submittal; therefore, we have not enclosed an application fee.

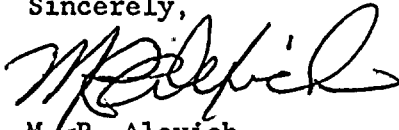
Dr. T. E. Murley

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AEP:NRC:0896G

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.

Sincerely,

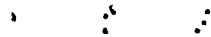


M. P. Alexich
Vice President

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



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ATTACHMENT 1 TO AEP:NRC:0896G
REASONS AND 10 CFR 50.92 ANALYSIS FOR
CHANGE TO THE
DONALD C. COOK NUCLEAR PLANT UNITS 1 AND 2
TECHNICAL SPECIFICATIONS

1. Revisions to Address NRC Concerns on Fuel Oil Surveillance Requirements

As described in the cover letter, the proposed changes of this letter are intended to address the concerns raised by your staff as a result of their review of our earlier submittal on diesel generator fuel oil. The changes we have made to address the concerns are as follows:

1. We have replaced the water and sediment test with the clear and bright test.
2. We have included a requirement to either remove accumulated sediment and clean the storage tanks or use an agitation-filtering method of cleaning at least once every 10 years.
3. We have revised the requirement that the offsite tests for new fuel be completed within 31 days to require completion of the tests within 14 days.

Analysis of Significant Hazards

Per 10 CFR 50.92, a proposed amendment will involve no significant hazards considerations if the 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

The surveillance requirements imposed by the requested change are more stringent than the requirements in our current T/Ss. Since these testing requirements are intended to confirm the quality of our diesel oil, we believe that this change will not involve a significant increase in the probability or consequences of an accident previously analyzed.

Criterion 2

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

Criterion 3

We believe that the requested change will not result in a significant reduction in a margin of safety for the reasons given in Criterion 1 above.

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 second of these examples refers to a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications: for example, more stringent surveillance requirements. Since the surveillance requirements imposed by the requested change are more stringent than the requirements in our current T/Ss, we believe that the proposed change falls within the scope of this example. Therefore, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

2. Editorial Change

In AEP:NRC:0896F, we inserted an additional surveillance section; therefore, what was originally Section 4.8.1.1.2.d became Section 4.8.1.1.2.e. This was not accounted for in Section 4.8.1.1.e.7. We are therefore proposing that the phrase in Section 4.8.1.1.e.7 be corrected to reflect the change from Section d to Section e.

Analysis of Significant Hazards for Editorial Change

Per 10 CFR 50.92, a proposed amendment will involve no significant hazards considerations if the 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

These proposed change is purely administrative in nature and is intended to correct an error in our earlier T/S change request submittal. Therefore, we believe this change does not involve a significant increase in the probability or consequences of a previously analyzed accident.

Criterion 2

Since the proposed change is administrative and introduces no new operating conditions or plant configurations, we believe that this change will not create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

For the reasons cited in Criterion 1 above, we believe that the proposed change will not result in 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 of amendments 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 change in nomenclature. We believe that the change requested above is of the type specified in this example, since it is intended to correct an error in an earlier T/S change request submittal. Therefore, we believe this change will involve no significant hazards considerations as defined in 10 CFR 50.92.

3. Additional Change

The footnote on page 3/4 8-3 proposed in AEP:NRC:0896B differs between Units 1 and 2. We intended to propose the Unit 1 footnote for both Units 1 and 2; however, due to an error, a portion of the footnote was omitted on the proposed Unit 2 page. We are now proposing that the footnote in the Unit 2 T/Ss be changed to agree with the Unit 1 footnote. Our justification for the Unit 2 change is the same as that proposed for Unit 1 in AEP:NRC:0896B (i.e., we believe compensatory starts were intended to be included in the reduction of fast starts), and therefore this change is merely an editorial change for clarity.

Analysis of Significant Hazards for Additional Change

Per 10 CFR 50.92, a proposed amendment will involve no significant hazards considerations if the 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

As stated above, we believe this change is an editorial change; therefore, we believe this change will not involve a significant increase in the probability or consequences of a previously analyzed accident.

Criterion 2

Since the proposed change is administrative and introduces no new operating conditions or plant configurations, we believe that this change will not create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

For the reasons cited in Criterion 1 above, we believe that the proposed change will not result in 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 of amendments 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 change in nomenclature. We believe that the change requested above is of the type specified in this example, since it is an editorial change intended to achieve consistency between the Unit 1 and 2 T/Ss. Therefore, we believe that this change will involve no significant hazards considerations as defined in 10 CFR 50.92.