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MURLEY, T. E. Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, revising RETS to include radioactivity releases generated from incineration of contaminated waste oil in plant auxiliary boiler sys. Supersedes 870828 request. Fee paid.

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AEP:NRC:1034A

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
TECHNICAL SPECIFICATION CHANGES - RADIOACTIVE EFFLUENTS

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

Attn: T. E. Murley

November 2, 1987

Dear Dr. Murley:

This letter and its attachments transmit proposed changes to the "Radiological Effluents" section of the Technical Specifications (T/Ss) for Units 1 and 2 of the Cook Plant. These changes are being proposed in order to include radioactivity releases generated from incineration of contaminated waste oil in the plant auxiliary boiler system as a T/S item. Our letter of August 28, 1987 (AEP:NRC:1034) provided detailed information regarding this method of waste oil disposal; this submittal supersedes the approval request made in that letter.

Attachment 1 to this letter contains a discussion of the proposed changes to our T/Ss as well as the justification required under 10 CFR 50.92. Attachment 2 contains the proposed T/Ss for Unit 1 and Unit 2. For completeness, and to assist in your review, Attachment 3 contains a copy of the August 28, 1987 submittal referenced above.

We believe that the proposed changes will not result in (1) a significant change in the type of effluents or significant increase in the amounts of any effluents that may be released offsite or (2) a significant increase in individual 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.

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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 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.

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

Attachment 1 to AEP:NRC:1034A

Donald C. Cook Nuclear Plant Units 1 and 2
Discussion of Proposed Technical Specification Changes

Discussion of Proposed Changes

Technical Specification Changes

Attachment 2 contains proposed changes to Technical Specification (T/S) Table 4.11-2 ("Radioactive Gaseous Waste Sampling and Analysis Program") and Section 3.11.2.3 ("Dose, Radioiodines, Radioactive Material in Particulate Form, and Radionuclides Other Than Noble Gases"). These changes add sampling and analysis requirements associated with incineration of contaminated waste oil in the auxiliary boiler system, and impose new requirements for the maximum allowable yearly off-site dose resulting from this pathway.

The contaminated waste oil to be addressed by the proposed T/S changes is generated principally from oil used for primary system pump motor bearing lubrication. Some contaminated oil is also generated from various sources in the auxiliary building. The contaminated waste oil is generated during normal maintenance-related activities performed on motors, pumps, and other mechanical devices. The contaminated oil is initially collected in 55-gallon drums and is then transferred to a waste oil storage tank. The contaminated oil has, in the past, been added to the (uncontaminated) fuel oil in the auxiliary boiler fuel oil tanks and subsequently burned when the auxiliary boiler was operating. Radioactivity releases from this pathway have been included in the releases reported in our semi-annual reports, and as such have also been included in our calculated doses to offsite population. Our analyses have shown that radioactivity releases from burning contaminated waste oil in the manner described above were always below the 10 CFR 20, Appendix B limits for radioactivity releases to air in unrestricted areas. Releases were also always in conformance with the requirements of 10 CFR 50, Appendix I for annual doses to individuals in unrestricted areas. Further detail as to our method of contaminated waste oil disposal and the associated analyses we have performed can be found in our letter AEP:NRC:1034 dated August 28, 1987. Our August 28 letter is included as Attachment 3 to this submittal.

In the August 28 submittal we had requested NRC approval for the method of contaminated waste oil disposal discussed above. However, in subsequent discussions with NRC staff it was decided that an amendment to our T/Ss was a preferable approach to resolving this matter. Those discussions form the basis for our present request for a T/S amendment.

Bases Changes

A review has been performed of the Bases sections potentially affected by the requested T/S changes. As a result of this review we believe the Bases as currently stated adequately accommodate the requested changes and that no revision of the Bases is required.

10 CFR 50.92 Evaluation

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

These changes add sampling and analysis requirements for contaminated waste oil to be incinerated in our auxiliary boiler system thereby enhancing the formal control of activities that have previously not been included in our T/Ss. The proposed changes to our T/Ss do not involve a significant increase in the probability or consequences of any previously evaluated accident.

Criterion 2

The proposed changes have no effect on plant operations; they expand the requirements contained in our T/Ss. Therefore, the changes do not create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

The proposed changes do not involve a significant reduction in the margin of safety since they only provide an enhancement in the formal control of activities not previously included in our T/S requirements.

The NRC 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 second of these examples refers to changes that impose additional limitations, restrictions or controls not presently included in the T/Ss. Since the requirements for sampling and analysis of contaminated waste oil prior to incineration in the auxiliary boiler system constitute restrictions that are not currently included in our T/Ss, we believe this example is applicable and that the proposed changes involve no significant hazards consideration as defined in 10 CFR 50.92.