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 AUTH. NAME AUTHOR AFFILIATION  
 ALEXICH, M. P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele  
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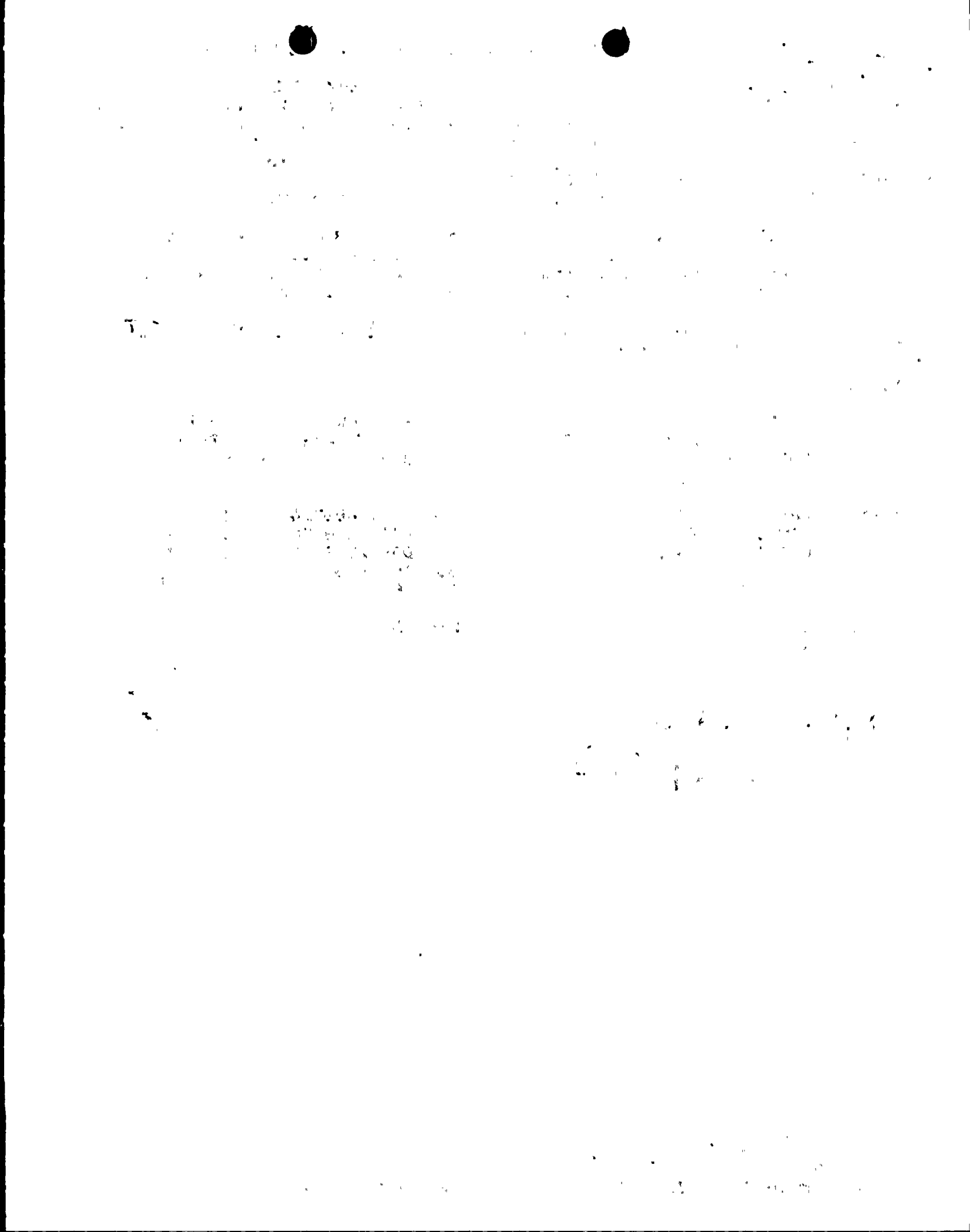
SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, deleting  
 Tech Spec 6.4.2, which sets forth requirements for fire  
 brigade training. Description of proposed changes & analysis  
 re significant hazards considerations encl. Fee paid.

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AEP:NRG:0692BK

Donald C. Cook Nuclear Plant Units 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
DELETION OF FIRE BRIGADE TRAINING REQUIREMENT  
FROM TECHNICAL SPECIFICATIONS

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

Attn: T. E. Murley

February 25, 1988

Dear Dr. Murley:

This letter constitutes an 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 delete Specification 6.4.2, which sets forth the requirements for fire brigade training. A detailed description of the proposed changes and our analyses concerning significant hazards considerations are included in Attachment 1 to this letter. Attachment 2 contains the proposed revised T/S pages.

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 amount of any effluents 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 and will be reviewed by the Nuclear Safety and Design Review Committee 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.

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T. E. Murley

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AEP:NRC:0692BK

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,



M. P. Alexich  
Vice President

cm

Attachments

cc: D. H. Williams, Jr.  
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:0692BK

Reasons and 10 CFR 50.92 Significant Hazards  
Evaluation for Changes to the Technical Specifications  
for Donald C. Cook Units 1 and 2

The purpose of this change is to address problems encountered with our current T/S requirements for fire brigade training. Technical Specification 6.4.2 currently requires us to comply with Section 27 of the 1976 edition of the NFPA Code, which specifies that fire brigade training sessions be conducted on a monthly basis. The current plant fire brigade training program is based upon the guidance provided by the NRC in a document entitled "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls and Quality Assurance," dated August 29, 1977. This document specifies that fire brigade training be conducted on a quarterly basis. The original Westinghouse Standard Technical Specifications (NUREG-0452, Rev. 0) required that fire brigade training meet the requirements of Section 27 of the NFPA Code except for fire brigade training, which was to be conducted quarterly; however, this requirement has been deleted and the current version of the Westinghouse Standard T/Ss (NUREG-0452, Rev. 4) does not include it. Therefore, although we intend to continue to comply with the guidance provided in the NRC document and conduct fire brigade training on a quarterly basis, we do not believe it is necessary to have this as a T/S requirement. We therefore propose deleting Specification 6.4.2 to (1) alleviate the conflict between our T/Ss and our fire brigade training program and (2) to achieve greater consistency between the T/Ss for the Cook Nuclear Plant and the current Westinghouse Standard Technical Specifications (STS).

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

Although we intend to continue to comply with the guidance provided by the NRC in the August 29, 1977 document, we do not believe it is necessary to have it as a T/S requirement. The NRC has allowed deletion of Specification 6.4.2 from the STS.

Since the change we are making is consistent with a change previously approved by the NRC for the STS, we believe that any increase in the probability or consequences of an accident previously evaluated or a decrease in a margin of safety would be insignificant.

Criterion 2

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

Criterion 3

See Criterion 1 above.

Lastly, we note that the Commission has provided guidance concerning the determining of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve a significant hazards consideration. This change is similar to the sixth example, which refers to changes that might result in some increase in the probability of occurrence or consequences of a previously analyzed accident, but the results of which are clearly within limits established as acceptable. We believe this change is clearly within acceptable limits since it was approved for the STS. Based on the above, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.



Attachment 2 to AEP:NRC:0692BK

Proposed Revised Technical Specifications Pages