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SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, changing surveillance requirements for station batteries.

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AEP:NRC:0896J

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 CHANGE TO ALLOW THE USE OF
SIMULATED LOADS FOR BATTERY TESTING

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

Attn: T. E. Murley

April 29, 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 change the surveillance requirements for the station batteries (including N-train batteries) to allow the use of simulated loads for testing battery capacity. 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.

Last year INPO raised a concern regarding inconsistent load profiles being used for battery testing. In response to that concern we developed load profiles for the batteries which reflect the maximum accident load requirements and committed to incorporating the load profiles into our test procedures prior to the Unit 2 refueling outage. In this technical specifications change proposal we are requesting that we be allowed to implement the new battery load profiles using simulated loads. The use of actual loads to conduct the testing involves the burden of ensuring that all actual loads are available. As we will be testing the batteries during the current Unit 2 refueling outage, we would appreciate your response as soon as possible.

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.

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T. E. Murley

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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 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 ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,



M. P. Alexich
Vice President

eh

Enclosure

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:0896J

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

The proposed changes described in this letter are intended to assist us in responding to an INPO concern regarding inconsistent load profiles being used during testing of the station batteries. The inconsistencies are the result of having battery loads out of service for maintenance during battery testing; therefore, to address the INPO concern, we are developing a battery load profile to reflect the maximum accident load requirements, and revising the test procedure to ensure that the load profile is satisfied by either simulated or actual station loads. Use of simulated loads to produce the load profile will make the testing easier, and we are therefore procuring a station battery tester which will generate the load profile with a high degree of accuracy. Since existing T/Ss do not allow the use of simulated loads for all of the emergency battery loads, we are proposing to change Specifications 4.8.2.3.2.d and 4.8.2.5.2.d to allow the use of either actual or simulated emergency loads during battery capacity testing. We are also deleting the double asterisks and their associated footnote from Table 4.8-1A. This footnote allows the use of either actual or simulated loads for the inverters during battery testing. This footnote is no longer necessary since specification 4.8.2.3.2.d has been changed to allow the use of either actual or simulated loads for all of the battery loads.

Since the station battery tester will be able to simulate the actual loads with a high degree of accuracy, we believe that use of the battery tester constitutes an equivalent method of testing. It is also noted that a change to allow the use of simulated loads for the static inverters was previously approved in Amendment 86 to the Unit 1 T/Ss and Amendment 72 to the Unit 2 T/Ss. In addition, this change makes our T/Ss more consistent with the Westinghouse Standard T/Ss (STS) (NUREG-0452, Rev. 4), which allow the use of simulated loads.

The T/S pages affected by this submittal are pages for which changes are pending due to AEP:NRC:0896B dated January 16, 1987. The proposed changes described in this submittal are in addition to our previous request and are not intended to supersede it.

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

We believe that using the highly accurate simulated loads applied by the station battery tester constitutes a means of testing equivalent to using actual loads. In addition, the change makes our T/Ss more consistent with the STS. We therefore believe that the proposed change will not involve a significant increase in the probability or consequences of an accident previously analyzed.

Criterion 2

The proposed changes introduce no new operating conditions or plant configurations; therefore, we believe this change will not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3

For the reasons cited in Criterion 1 above, we believe that the proposed change will not involve a significant reduction in a margin of safety.

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:0896J

Proposed Revised Technical Specifications Pages