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SUBJECT: Application for amend to License DPR-74,revising Tech Specs to delete overload test for diesel generators.Fee paid.

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AEP:NRC:0896L

Donald C. Cook Nuclear Plant Unit 2
Docket No. 50-316
License No. DPR-74
EXPEDITED TECHNICAL SPECIFICATION CHANGE TO
DELETE OVERLOAD TEST FOR DIESEL GENERATORS

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

Attn: T. E. Murley:

October 31, 1988

Dear Dr. Murley:

This letter and its attachments constitute an application for amendment to the Technical Specifications (T/Ss) for the Donald C. Cook Nuclear Plant Unit 2. Specifically, we are proposing to eliminate the overload test required by Specification 4.8.1.1.2.c.9. A detailed description of the change, our reasons for requesting the change, and our analyses concerning significant hazards are contained in Attachment 1. Attachment 2 includes the proposed revised T/S pages.

In our letter AEP:NRC:0896B dated January 16, 1987, we submitted changes to our diesel generator T/Ss which were intended to maintain and improve diesel generator reliability as recommended by your staff in Generic Letter (GL) 84-15. One of the changes requested by our letter was the elimination of the overload test required by Specification 4.8.1.1.2.c.9. This overload test is required to be performed by December 8, 1988. We were recently informed by members of your staff that the changes proposed in AEP:NRC:0896B will not be approved by that time. Since we are concerned about the impact that the overload test may have on our diesel generators, we are submitting this expedited T/S change application and requesting approval prior to December 8, 1988.

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

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Safety and Design Review Committee at their next regularly scheduled meeting.

In compliance with the requirement 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 bee 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

ldp

Attachments

cc: D. H. Williams, Jr. - w/o attachment
W. G. Smith, Jr. - Bridgman - w/o attachment
G. Bruchmann
R. C. Callen
G. Charnoff - w/o attachment
NRC Resident Inspector - Bridgman
A. B. Davis - Region III

ATTACHMENT 1 TO AEP:NRC:0896L

REASONS AND 10 CFR 50.92 SIGNIFICANT HAZARDS EVALUATION
FOR CHANGES TO THE TECHNICAL SPECIFICATIONS FOR THE
DONALD C. COOK NUCLEAR PLANT UNIT 2

Description of Change

The change being proposed by this letter would eliminate the overload test required by Specification 4.8.1.1.2.c.9. Our current Unit 2 T/Ss require that each diesel generator be surveillance tested by operating it for at least 24 hours. During the first two hours of this test, each diesel is required to operate at 10% overload (3850kw); for the remaining 22 hours, each diesel must be operated at the design load of 3500kw. We are proposing to allow the entire 24-hour test to be conducted at a load of 3500kw thereby eliminating the requirement to overload the diesels.

Reason for Change

We are required to conduct the overload test on the Unit 2 diesel generators prior to December 8, 1988. We believe that this test would have a detrimental effect on our diesel generators and we are therefore proposing to eliminate the overload requirement.

Justification for Change

Our diesel manufacturer has stated that our diesels are rated at 3500kw; however, they have not provided any information to support an overload rating of any type. We have noted the guidance provided in GL 88-15. Section 2 of this GL deals with diesel generator loading in excess of the design rating. An instance is described in which the diesel generators at the Crystal River Nuclear Plant were tested beyond the manufacturer's design limit. The conclusion drawn was that this could jeopardize the capacity and capability of the diesel generators to reliably perform their intended safety function during a design basis event. Since our diesel manufacturer has only provided information to support the design rating of 3500kw and has never provided anything to support an overload rating, operation of our diesels at 10% overload is beyond the manufacturer's design limit. We believe that operating our diesels at 10% overload for a two-hour period could have a detrimental effect on their performance and could negatively impact their capability to reliably perform their intended safety function.

The 3500kw capacity is adequate to supply sufficient power to operate the engineered safety features and protection systems required to avoid undue risk to public health and safety, and we therefore see no need to test our diesels beyond this capacity.

Significant Hazards Analysis

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, based on the above information, is provided below.

Criterion 1

This proposed change is in accordance with NRC guidance provided in GL 88-15 which raises the concern over diesel generator loading in excess of the design rating. We believe that the overload testing could have a detrimental effect on the performance of our diesels and could negatively impact their capability to reliably perform their intended safety function. Testing our diesels at the design rating of 3500kw should be acceptable since this capacity is adequate to supply sufficient power to operate the engineered safety features and protective systems required to avoid undue risk to public health and safety. Our proposed method of testing will therefore ensure that the diesels are capable of supplying the necessary loads during a design basis event and will eliminate testing which we believe has a negative impact on our diesels and degrades their reliability. We therefore believe that the proposed change will not significantly increase the probability or consequences of a previously analyzed accident and will not significantly decrease a margin of safety.

Criterion 2

The proposed change will not result in a change in plant configuration or operation and will not place the plant in an unanalyzed condition. We therefore conclude that the change will not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

Criterion 3

See Criterion 1 above.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes which 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 these changes fall within the scope of this example for the reasons cited above. Therefore we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.