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SUBJECT: Forwards rev pages to 890206 application for amends to
 Licenses DPR-58 & DPR-74, reducing fire watch burden.

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AEP:NRC:0692BS

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
REVISION TO FIRE PROTECTION TECHNICAL SPECIFICATION;
SUBMITTAL INTENDED TO REDUCE FIRE WATCH BURDEN

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

Attn: T. E. Murley

November 10, 1989

Dear Dr. Murley:

The purpose of this letter is to provide revision pages to our submittal AEP:NRC:0692B0 dated February 6, 1989. The revisions contained herein reflect those comments provided to us by Mr. D. Kubicki and Mr. J. Glitter of your staff in an August 30, 1989, teleconference. These comments further reflect the staff's position on the Technical Specifications (T/Ss) and revise or supplement only certain pages of our previous submittal AEP:NRC:0692B0.

A description of the changes to the T/S pages provided via submittal AEP:NRC:0692B0 is contained in Attachment 1 to this letter, as well as our analyses concerning significant hazards. Attachment 2 contains the proposed revised T/S pages.

We believe that the proposed amendment 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.

The proposed amendment has been reviewed by both the Plant Nuclear Safety Review Committee and the Nuclear Safety and Design Review Committee.

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.

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Dr. T. E. Murley

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AEP:NRC:0692BR

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

Sincerely,

A handwritten signature in dark ink, appearing to read 'M. P. Alexich', written in a cursive style.

M. P. Alexich
Vice President

ldp

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
R. C. Callen
G. Charnoff
A. B. Davis
NRC Resident Inspector - Bridgman
NFEM Section Chief

ATTACHMENT 1 TO AEP:NRG:0692B0
REASONS AND 10 CFR 50.59 SIGNIFICANT HAZARDS
EVALUATION FOR THE PROPOSED TECHNICAL SPECIFICATION CHANGES
FOR DONALD C. COOK NUCLEAR PLANT UNITS 1 AND 2

I. Introduction

Please refer to letter AEP:NRC:0692B0 dated February 6, 1989, for justifications and information regarding the overall changes to the fire protection T/S. As stated in the cover letter, the following information serves to revise only certain T/S pages submitted under cover of AEP:NRC:0692B0 based on staff comments.

This letter proposes changes to the following T/Ss:

Unit 1: 3/4.3.3.7, 3/4.7.9.1, 3/4.7.9.2, 3/4.7.10

Unit 2: 3/4.3.3.8, 3/4.7.9.1, 3/4.7.9.2, 3/4.7.10

The T/S pages in Attachment 2 reflect a composite of those changes requested via this submittal and submittal AEP:NRC:0692B0 dated February 6, 1989.

II. Description of Proposed Changes

A. Fire Detection Instrumentation

A modification to those T/S amendment pages submitted via AEP:NRC:0692B0 for T/Ss 3/4.3.3.7 (Unit 1) and 3/4.3.3.8 (Unit 2) is proposed based on staff comments. That is, the action statements for these specifications will be similar to that proposed in Revision 5 to the Westinghouse Standard T/Ss. The format of the Standard T/S has been modified for clarification purposes. We believe that the requirements provided in the Standard T/S remain the same in the proposed T/S wording. In order to meet the format requirements of the Standard T/Ss, Tables 3.3-10A-D (Unit 1) and 3.3-11A-D (Unit 2) were each consolidated into one table.

Surveillance requirement 4.3.3.7 was changed over that submitted in AEP:NRC:0692B0 to reference the new detection table created.

A further description of the other changes to these T/Ss over the current T/S 3/4.3.3.7 (Unit 1) and 3/4.3.3.8 (Unit 2) is contained in Section II.A of Attachment 1 to AEP:NRC:0692B0.

B. Fire Suppression Water System

The following modifications are proposed to T/S 3/4.7.9.1 (both units) submitted via AEP:NRC:0692B0:

1. Action (c) for this specification, "The provisions of Specification 3.0.3 and 3.0.4 are not applicable" is combined with Action (a) for this specification.

2. The statement "by observing three points (minimum, rated, and peak) on the pump's performance curve" has been added to surveillance requirement 4.7.9.1.1.e.2.
3. The phrase "simulated automatic actuation of the system throughout its operating sequence" has been reinserted into surveillance requirement 4.7.9.1.1.e.

The footnote to T/S 3.7.9.1 was changed for clarification purposes to better describe the shared fire water system configuration.

A further description of other changes to T/S 3/4.7.9.1 (both units) over the current version is contained in Section II.B of Attachment 1 to AEP:NRC:0692B0.

C. Spray and/or Sprinkler Systems

The action statement for T/S 3/4.7.9.2 discussed under "Action Statement B" (Section II.C.1.b of Attachment 1 to AEP:NRC:0692B0) has been modified to require that hourly fire watches be posted in the areas where suppression systems are inoperable per T/S 4.7.9.2 and electric or pneumatic detection is verified operable in the area.

The bases pages corresponding to fire suppression systems were changed to better align with the T/Ss proposed in this area. Two pages, B 3/4 7-9 for Unit 1 and B 3/4 7-8 for Unit 2, submitted under AEP:NRC:0692B0 were found to contain minor typographical errors.

A description of the other changes to T/S 3.7.9.2 (both units) over the current version is contained in Section II.C of Attachment 1 to AEP:NRC:0692B0.

D. Fire Rated Assemblies

Option (1) of the action statement for T/S 3.7.10 (discussed in Section II.G.1 of Attachment 1 to AEP:NRC:0692B0) has also been modified to require that an hourly fire watch patrol be established, in addition to verifying that the fire detectors and/or fire suppression system on at least one side of the inoperable assembly are operable.

It should be indicated, for clarification purposes, that option (4) (secure in the closed position with no further required compensatory measure) would only be imposed for fire dampers after the appropriate HVAC and radiological reviews have been performed. A footnote has been added to the T/S page (both units) to ensure such a review is conducted prior to employing this option for fire dampers.

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"Safety-related" was also removed from the T/S 3.7.10 Limiting Condition for Operation (LCO) and was replaced with "safe shutdown." The purpose of this was that present fire area boundaries maintained under the T/S barrier surveillance program are those primarily defined by the Safe Shutdown Capability Assessment Report (i.e., 10 CFR 50, Appendix R compliance report). Safety related fire areas defined in our original 1977 Cook Nuclear Plant Fire Hazards Analysis (FHA) have, for the most part, been superseded by our "Appendix R" barriers.

A description of the other changes to T/S 3/4.7.10 (both units) over the current version is contained in Section II.G of Attachment 1 to AEP:NRC:0692B0.

III. Justifications and Significant Hazards Analyses

It is requested that the reader refer to Section III of Attachment 1 to submittal AEP:NRC:0692B0 dated February 6, 1989, for a presentation of the justifications and significant hazards analyses for most fire protection T/S changes proposed. Based on the nature of the changes proposed herein over those requested via the aforementioned submittal, we believe that no further justifications and significant hazards analyses are required. This is due to the fact that:

- 1) the changes proposed herein are based solely on NRC staff comments on submittal AEP:NRC:0692B0, and
- 2) in all cases, the changes herein represent a more conservative position/approach than that proposed within submittal AEP:NRC:0692B0.

