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 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post B51125)

SUBJECT: Application for amends to Licenses DPR-5B & DPR-74, changing
 Tech Specs to reduce large administrative burden on plant
 mgt required to maintain presonnal to serve as fire watches.
 Fee paid.

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May 22, 1986
AEP:NRG:0960D

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
FIRE WATCH TECHNICAL SPECIFICATIONS BASES CHANGE REQUEST

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

Pursuant to conversations with your staff, this letter and its attachments constitute a request for revision to the Bases section of the Technical Specifications for Donald C. Cook Nuclear Plant Units 1 and 2. The reasons for the proposed change and a description of the changes are contained in Attachment 1 to this letter. The proposed revised Technical Specification Bases pages are contained in Attachment 2. The changes described in this letter supersede any other previous documentation in this area we have submitted to you.

Pursuant to 10 CFR 170.12(c), we have enclosed an application fee of \$150.00 for the review associated with this change request.

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.

Very truly yours,



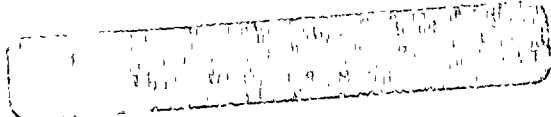
M. P. Alexich
Vice President

RBK
5/22/86

MPA/rjn
Attachments

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
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NRC Resident Inspector - Bridgman

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ATTACHMENT 1 TO AEP:NRC:0960D
REASONS FOR CHANGES TO THE
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2
TECHNICAL SPECIFICATION BASES

Description

Unit No. 1; page B 3/4 7-8

Unit No. 2; pages B 3/4 7-7, 7-8

This change is being requested to reduce the large administrative burden on plant management required to maintain personnel to serve as fire watches. The effort required to administer fire watch personnel diverts management's attention from other duties which could have much greater safety significance. In particular, an inordinate amount of manpower has been involved with "continuous fire watches." It has been our interpretation that a continuous fire watch must be a stationary watch who cannot leave the immediate area. This requires several fire watches in one area if any of the fire zones are out of visual range. We believe this duplication of fire watches is unnecessary for the prompt detection of fires. In order to alleviate this situation, we propose to define a continuous fire watch in the Bases for T/S 3.7.9 as follows: "A continuous fire watch requires that a trained individual be in the specified area at all times and that each fire zone within the specified area be patrolled at least once every fifteen minutes with a margin of five minutes." This change will allow us to reduce the number of fire watches while maintaining continuous fire detection capability.

In addition, we are adding the following statement to the Bases: "All hourly fire watch patrols are performed at intervals of sixty minutes with a margin of fifteen minutes." This change was discussed with your staff in our meeting on January 13, 1986 and recommended for submittal in the NRC letter summarizing the meeting, dated February 11, 1986.

Another statement is added to the Bases for T/S 3.7.10 which reflects our belief that a fire-rated assembly and/or sealing device is operable provided that it is capable of performing its intended safety function. For example, if a fire door is inoperable due to an inadequate closing device, securing the door in the closed position restores the door to operable status. If, however, the fire door were inoperable because it had a hole in it, it would not be operable if secured in the closed position (because it would not perform its intended safety function).

These changes will allow us to reduce the administrative burden associated with the fire protection program while still maintaining the high integrity of the program. Therefore we believe these changes to the Technical Specification Bases will enhance our overall fire protection program.