REGULATOR INFORMATION DISTRIBUTION S TEM (RIDS)

ACCESSION NBR: 8802050072 DOC. DATE: 88/02/01 NOTARIZED: NO DOCKET #
FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
AUTH. NAME AUTHOR AFFILIATION
ALEXICH, M. P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
RECIP. NAME RECIPIENT AFFILIATION
MURLEY, T. E. Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, changing Tech Spec 3/4.12.1 & Bases for Tech Spec 3/4.11.2 re radiological analysis milk samples & child thyroid dose release pathway. Suppl info encl. Fee paid.

DISTRIBUTION CODE: A009D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 9+6
TITLE: OR/Licensing Submittal: Appendix I

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD3-3 LA	1	0	PD3-3 PD	5	5
	WIGGINGTON, D	1	1			
INTERNAL:	ARM/DAF/LFMB	1	0	NRR/DREP DIR	1	1
	NRR/DREP/RPB	1	1	NRR/PMAS/PMSB	1	1
	OGC/HDS1	1	0	REG FILE 01	1	1
	RES/DE/EIB	1	1			
EXTERNAL:	LPDR	1	1	NRC PDR	1	1
	NSIC	1	1			

w/ check
$150.00
351-6174

TOTAL NUMBER OF COPIES REQUIRED: LTTR 17 ENCL 14

Indiana Michigan
Power Company
P.O. Box 16631
Columbus, OH 43216

AEP
INDIANA
MICHIGAN
POWER

AEP:NRC:1046

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
CHANGES TO THE RADIOLOGICAL ENVIRONMENTAL
TECHNICAL SPECIFICATIONS

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

Attn: T. E. Murley

February 1, 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 revise T/S 3/4.12.1 and the Bases for T/S 3/4.11.2. These changes will clarify how we obtain milk samples for radiological analysis and will make the T/S Bases consistent with the Westinghouse Standard T/Ss with regard to the thyroid dose release pathway for a child. 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 (PNSRC) and will be reviewed by the Nuclear Safety and Design Review Committee (NSDRC) 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.

w/check $150 # 351-0174
A009 1/1

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: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman
A. B. Davis - Region III

bc: P. A. Barrett/C. E. Manges
S. J. Brewer/J. L. Leichner/H. W. Jones
L. Gibson/D. Fitzgerald-Stewart
S. H. Horowitz/T. O. Argenta/R. C. Carruth
J. J. Markowsky/S. H. Steinhart/P. G. Schoepf
R. W. Jurgensen
J. G. Feinstein
R. F. Kroeger
M. L. Horvath - Bridgman
E. A. Morse - Bridgman
J. F. Kurgan
J. B. Shinnock
J. F. Stang, NRC - Washington, D.C.
AEP:NRC:1046
DC-N-6015.1

Attachment 1 to AEP:NRC:1046

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

The changes we are proposing to Section 3/4.12.1 and Bases Section 3/4.11.2 of the Technical Specifications (T/Ss) are described below.

1. Milk and Broad Leaf Vegetation Sampling - T/S 3/4.12.1

The changes we are proposing to T/S 3/4.12.1 are intended to address problems encountered with our milk sampling T/S requirements. Currently, Item 4a of Table 3.12-1 requires that milk samples be collected for radiological analysis from Stevensville, Bridgman, Galien, Dowagiac, and South Bend. Samples are currently taken from Bridgman, Galien, Dowagiac, and four other locations; however, no samples are collected in Stevensville or South Bend. A letter from Mr. W. G. Smith, Jr. to Mr. A. B. Davis dated November 12, 1987 notified the NRC of this situation and provided a detailed description of our current milk sampling program. As described in that letter, we believe our existing milk sampling program meets the intent of the NRC guidance provided in Regulatory Guide 4.8 and the associated Branch Technical Position (BTP). We concluded the letter by committing to submit revised T/Ss by January 31, 1988 to clarify our T/Ss with regard to the locations used. This letter is intended to satisfy that commitment.

The changes we are proposing make our T/Ss more consistent with the NRC guidance and our existing sampling program. Specifically, we are proposing to require sampling at each indicator farm and each background farm, with indicator farm and background farm defined as follows:

Indicator Farm Nearest milk producer in each of the land sectors within 8 miles of the plant site who is willing to participate in the radiological environmental monitoring program.

Background Farm A milk producer in one of the less prevalent wind directions at a distance greater than 15 miles but less than 25 miles who is willing to participate in the radiological environmental monitoring program.

The number of locations sampled may vary due to the number of sectors which contain a producer who is willing to participate. The possibility exists that no willing

participants may be found within 8 miles of the plant site. In order to address this possibility, we are proposing changes to the T/S requirements for broad leaf vegetation sampling. Specifically, if fewer than three willing indicator milk farms are found, broad leaf vegetation samples will be collected monthly when available. The indicator vegetation samples should be from broad leaf vegetation grown nearest to the offsite locations of highest calculated annual average D/Q. The vegetation background sample should be from similar vegetation grown 15-25 miles distant in one of the less prevalent wind directions. This proposed change therefore improves the T/Ss by providing a means of monitoring the radioiodine pathway if no cooperative milk producers are found.

We believe that our proposed T/S requirements meet the intent of the NRC guidance, which is to sample three farms with the highest dose potential and to sample one control station. If three samples cannot be obtained, the guidance suggests vegetation sampling as a replacement. Our proposed T/Ss meet this intent since they require that we sample at least three farms and a control station. If this is not possible, vegetation sampling is required. The fact that we sample the closest farm willing to participate in each sector ensures that we meet the guidance which suggests that sampling be performed at locations with the highest dose potential.

The proposed changes constitute an improvement over our current T/S requirements. We believe that neither our program nor the NRC guidance is intended to limit sampling to specific towns. Our proposed T/Ss provide guidelines that ensure that the best available locations are sampled and allows us to update our monitoring program as necessary to reflect changes that might occur in the areas surrounding the Donald C. Cook Nuclear Plant.

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

The intent of the Radiological Environmental Monitoring Program is to verify that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and the modeling of the environmental exposure pathways. The purpose of the program is therefore to verify that actual radiation levels agree with the expected levels, and as such, changes in the program would not impact the safety analysis for any of the previously evaluated accidents described in our updated FSAR. We therefore conclude that the proposed changes would not significantly increase the probability or consequences of any previously analyzed accident.

Criterion 2

The changes we are proposing will not result in any changes in plant configuration or operation. We therefore believe that these changes will not create the possibility of a new or different accident from any accident previously analyzed or evaluated.

Criterion 3

We believe that the proposed T/S requirements are an improvement over our existing T/Ss in that they allow flexibility to ensure that we are sampling the best available locations. In addition, we believe that our proposed requirements are consistent with the intent of the NRC guidance and will allow us to maintain our ability to meet the requirements of Section IV.B.2 of Appendix I to 10 CFR 50. We therefore believe the proposed changes will not result in a significant reduction in a margin of safety.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth of these examples refers to changes that either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results are clearly within all acceptable criteria. We believe the change falls within the scope of this example for the reasons cited above. Thus, we believe this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

2. Cow-Milk-Infant Pathway - Bases for T/S 3/4.11.2

The proposed change modifies the Bases for T/S 3/4.11.2.1, "Dose Rate." The change we are proposing will make our T/Ss more consistent with the guidance provided in the Bases Section 3/4.11.2.1 of NUREG-0472, Rev. 3 and NUREG-0452, Rev. 5, which states, "These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to a child via the inhalation pathway to less than or equal to 1500 mrems/year. We are therefore proposing that the calculated thyroid dose rate be based on a child via the inhalation pathway.

We believe that the proposed change will make the requirements more stringent than our existing requirements in that it will provide a more conservative thyroid dose rate.

3. Editorial Changes

We also propose a change to Bases Section 3/4.11.2 by deleting the redundant $\leq$ signs.

Attachment 2 to AEP:NRC:1046

Proposed Revised Technical Specification Pages