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SUBJECT: Application for amends to Licenses DPR-58 & DPR-74.Amends mod Tech Specs 4.0.2.

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AEP:NRC:1021
GL 89-14

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
GENERIC LETTER 89-14 TECHNICAL SPECIFICATION CHANGES

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

Attn: T. E. Murley

February 7, 1990

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 Units 1 and 2. Specifically, we propose to modify Technical Specification 4.0.2 and its associated Bases. Technical Specification 4.0.2 permits surveillance intervals to be extended up to 25 percent of the specified interval. It also limits extending surveillances so that the combined time intervals for any three consecutive surveillances intervals do not exceed 3.25 times the specified surveillance interval. This application for amendment proposes to delete the 3.25 extension limit in accordance with the guidance in Generic Letter 89-14, "Line Item Improvement in Technical Specifications-Removal of the 3.25 Limit on Extending Surveillance Intervals."

Our reasons for the proposed changes, as well as our analyses concerning significant hazards considerations, are contained in Attachment 1 to this letter.

Attachment 2 of this submittal contains proposed revised T/S pages that reflect the proposed changes.

In addition, we request that the amendment be issued by September 1, 1990 and be effective immediately to prevent an unnecessary shutdown of Cook Nuclear Plant Unit 1.

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We believe that the proposed changes will not result in (1) significant change in the types of effluents or a significant increase in the amounts of any effluents that may be released offsite, or (2) a significant increase in individual or cumulative occupational radiation exposure.

These changes have been reviewed by the Plant Nuclear Safety Review Committee and by 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.

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

Sincerely,

M. P. Alexich
Vice President

eh

Attachments

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:NRC:1021

Reasons and 10 CFR 50.92

Analyses for Changes to the Donald C. Cook Nuclear Plant

Units 1 and 2 Technical Specifications

Description of Change

As suggested in Generic Letter 89-14, this application for amendment proposes to revise Technical Specification (T/S) 4.0.2 by removing the requirement that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. Additionally, we are proposing to modify the associated TS Bases.

Background

Technical Specification 4.0.2 permits surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates scheduling activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance. Specification 4.0.2 also limits extending surveillances so that the combined time interval for any three consecutive time intervals shall not exceed 3.25 times the specified surveillance interval. On August 21, 1989, the NRC issued Generic Letter 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals." The Generic Letter concluded that removal of the 3.25 limit from Specification 4.0.2 results in a greater benefit to safety than limiting the use of the 25 percent allowance to extend surveillance intervals.

Impact on Plant Operations

Approval of this request will provide the following benefits:

1. Facilitates scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not conducive to the safe conduct of a surveillance.

2. Reduces the potential for unnecessary forced shutdowns to perform surveillance activities.

3. Eliminates the administrative and logistical burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit.

4. Minimizes the need for surveillance interval extension amendments.

Safety Evaluation

Many surveillances have a specified surveillance interval of 18 months. Generally, an 18-month surveillance interval is intended

to allow the surveillance to be performed when the unit is shutdown during a refueling outage. Therefore, the actual time interval for the performance of these surveillances is dependent on the length of a fuel cycle, but it cannot exceed 18 months plus the 25 percent allowance. The safety benefit of performing these surveillances during a plant shutdown is that systems do not have to be removed from service at a time that they are required to be operable. This minimizes the amount of time which systems are unavailable during power operation due to surveillance requirements, thereby minimizing the impact on safety. In a few instances, the TS specifically require some surveillances to be performed during a plant shutdown. When a limit is reached on extending an 18-month interval, a forced plant shutdown to perform these surveillances is generally the only alternative short of a license amendment that defers the performance of these surveillances until the end of a fuel cycle.

Usually, the length of a fuel cycle would not exceed 18 months by more than the 25 percent allowance, i.e., 4-1/2 months. A more common situation has been to encounter the 3.25 limit on the combined time interval for three consecutive surveillance intervals. The NRC staff has normally approved one-time amendment requests to waive the performance of 18-month surveillances until the end of the fuel cycle when they would exceed the 3.25 limitation on consecutive surveillances yet would not exceed the 25 percent allowance for extending the 18-month surveillance interval. A forced shutdown to perform these surveillances is not justified from a risk standpoint to avoid exceeding the 3.25 limit when extending these surveillances is within the 25 percent allowance. The 18-month surveillances are normally performed during a refueling outage when the plant is in a desirable condition for conducting these surveillances. As stated in the NRC's Safety Evaluation for Commonwealth Edison's LaSalle Station, the risk of performing some of these surveillances during plant operation has been determined to be greater than the impact on safety of exceeding the 3.25 limit.

In addition to its application to refueling outage surveillances, the use of the 25 percent allowance for extending surveillance intervals can provide a safety benefit when it is used during plant operation. When plant conditions are not suitable for the conduct of surveillances due to safety systems out-of-service for maintenance or due to other ongoing activities, safety is enhanced by the use of the allowance that permits a surveillance interval to be extended. In such cases, the safety benefit of extending a surveillance interval up to 25 percent would exceed the risk reduction derived by conforming to the 3.25 limitation.

In summary, based on the above considerations, the removal of the 3.25 limit will have an overall positive impact on safety. Consequently, we believe there is reasonable assurance that the proposed change will not adversely affect the health and safety of the public.

Significant Hazards Considerations

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 evaluated,

(2) create the possibility of a new or different kind of accident from any accident previously evaluated, or

(3) involve a significant reduction in a margin of safety.

Criterion 1

Deletion of the 3.25 extension limitation will not significantly affect equipment reliability and does not affect the probability or consequences of accidents previously evaluated in the FSAR Update. The surveillance interval will still be constrained by the 25 percent interval extension criteria of T/S 4.0.2. The risk involved with the alternative to perform 18-month surveillances during plant operation is greater than the risk involved with exceeding the 3.25 limit. When plant conditions are not conducive for the safe conduct of surveillances due to safety systems being out-of-service for maintenance or due to other ongoing surveillance activities, safety is enhanced by the use of the allowance that permits a surveillance interval to be extended.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The proposed revision to the T/S will not result in any physical alteration to any plant system, nor would there be a change in the method by which any safety-related system performs its function.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Criterion 3

Deletion of the requirement that any three consecutive surveillance intervals shall not exceed 3.25 times the interval will not significantly affect equipment reliability, rather it will reduce the potential to interrupt normal plant operations due to surveillance scheduling. This proposed exemption will allow all surveillance intervals to be constrained by the maximum allowable extension of 25 percent of the specified surveillance interval, which may enhance safety when used during plant operation.

Therefore, the proposed change does not involve 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 (48FR14870) of amendments considered not likely to involve significant hazards considerations. The sixth of these examples refers to changes which may result in some increase in the probability of occurrence or consequences of a previously analyzed accident or may reduce in some way a safety margin, but the results of which are clearly within limits established as acceptable. The effect of the proposed T/S changes will be to provide deletion of the 3.25 extension limitation found in T/S 4.0.2. The changes, however, are supported by Generic Letter 89-14. Therefore, we conclude that the example cited is relevant and that the changes should not involve significant hazards considerations.

Attachment 2 to AEP:NRC:1021

Proposed Revised Technical Specification Changes