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AUTH.NAME AUTHOR AFFILIATION
FITZPATRICK,E. 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,deleting TS 5.9.1 & Table 5.9-1,Unit 1 & TS 5.7.1 & Table 5.7-1,Unit 2 of TS entitled, "Component Cyclic or Transient Limits," per new STS published by NRC as NUREG-1431,dtd 920928.

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

INDIANA MICHIGAN POWER

AEP:NRC:0980U

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
TECHNICAL SPECIFICATION CHANGE REQUEST:
DELETION OF COMPONENT CYCLIC OR TRANSIENT
LIMIT TABLE

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

Attn: T. E. Murley

November 12, 1993

Dear Dr. Murley:

This letter and its attachments constitute an application for amendment to the Technical Specifications (T/S) for the Donald C. Cook Nuclear Plant Units 1 and 2 in accordance with 10 CFR 50.90. The proposed change deletes T/S 5.9.1 and Table 5.9-1 (Unit 1) and T/S 5.7.1 and Table 5.7-1 (Unit 2) of the T/S, entitled "Component Cyclic or Transient Limits." This change is consistent with the new Standard Technical Specifications for Westinghouse Plants, published by the NRC as NUREG 1431, dated September 28, 1992.

Attachment 1 provides a detailed description of the proposed change, the justification for the change, and our proposed determination of no significant hazards consideration performed pursuant to 10 CFR 50.92. Attachment 2 contains the existing T/S pages marked to reflect the proposed change. Attachment 3 contains the proposed, revised T/S pages.

We believe that the proposed change 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.

The proposed change has 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. J. R. Padgett of the Michigan Public Service Commission and to the Michigan Department of Public Health.



A001
1/1

This letter is submitted pursuant to 10 CFR 50.30(b) and, as such, an oath statement is attached.

Sincerely,

E. E. Fitzpatrick
Vice President

dr

Attachments

cc: A. A. Blind - Bridgman
G. Charnoff
J. B. Martin - Region III
NFEM Section Chief
NRC Resident Inspector - Bridgman
J. R. Padgett

STATE OF OHIO)
COUNTY OF FRANKLIN)

E. E. Fitzpatrick, being duly sworn, deposes and says that he is the Vice President of licensee Indiana Michigan Power Company, that he has read the foregoing Technical Specification Change Request: Deletion of Component Cyclic or Transient Limit Table and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

E E Fitzpatrick

Subscribed and sworn to me before this 12th

day of November, 1993.

Rita D Hill
NOTARY PUBLIC

RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-23-94

ATTACHMENT 1 TO AEP:NRC:0980U

10 CFR 50.92 ANALYSIS FOR CHANGES
TO THE DONALD C. COOK NUCLEAR PLANT
UNITS 1 AND 2 TECHNICAL SPECIFICATIONS

1. DESCRIPTION OF CHANGES

We propose to delete from the technical specifications (T/S) T/S 5.9.1/Table 5.9-1 (Unit 1) and T/S 5.7.1/Table 5.7-1 (Unit 2), entitled "Component Cyclic or Transient Limits." The limits of these T/S would be relocated to the UFSAR, and would be administratively controlled. Additionally, the Index Section is revised accordingly.

2. REASON FOR THE CHANGE

The change achieves consistency with the new Standard T/S for Westinghouse Plants, published by the NRC as NUREG 1431 on September 28, 1992. The table contains cyclic and transient limits for the reactor coolant and secondary systems. For example, the table lists the number of heatup and cooldown cycles the reactor coolant system may undergo, as well as the number of hydrostatic pressure tests the reactor coolant system and secondary system may undergo. Although limits are provided in the table, there are no specific limiting conditions for operation or action statements provided.

NUREG 1431 was the result of a technical specification improvement program undertaken by the NRC and the nuclear industry. One of the results of the program was the streamlining of the T/S by removal of requirements that were better located elsewhere. The changes allowed the new T/S to be more clearly focused on those requirements necessary to support the safety analyses, versus requirements in vogue at the time of plant licensing. Four general criterion were used to determine if a requirement from the former Standard T/S would remain in the new Standard T/S. These criterion involve:

1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

2. A process variable that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

4. Equipment that probabilistic risk assessment or operating experience has shown to be important to public health and safety.

The T/S and table we are proposing to remove contains component cyclic and transient limits. The table is essentially a requirement for recordkeeping regarding the number of cycles or transients that have been experienced by the reactor coolant or secondary systems. In this sense, the requirements are administrative in nature, and clearly did not meet any of the criteria listed above. Thus, the table was not included in the new Standard T/S. Removal of the table from the T/S will streamline the document, and will help to achieve the appropriate focus of the document.

3. JUSTIFICATION FOR THE CHANGE

The change is consistent with the new Standard T/S, as published in NUREG 1431. In this sense, the change has already been reviewed and found acceptable by the NRC. There are no Cook Nuclear Plant specific features that would make the change not applicable.

There is already a plant procedure that verifies that the requirements of the T/S table are implemented. The table currently in the T/S will be relocated to the UFSAR. A note will be added to the procedure to ensure that any changes to the component cyclic or transient limits undergo an unreviewed safety question determination per the requirements of 10 CFR 50.59. Per 10 CFR 50.59, the change can only be made if the change does not:

1. increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report,

2. create the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report, or

3. reduce the margin of safety as defined in the basis for any T/S.

Any changes to the requirements of the present table would have to pass the stringent criteria of 10 CFR 50.59 in order to be implemented.

4. 10 CFR 50.92 CRITERIA

Per 10 CFR 50.92, a proposed amendment does not involve a significant hazards consideration if the change 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

The proposed change is administrative in nature in that it simply relocates a table containing component cyclic and transient limits from the T/S to the UFSAR. Any change to the requirements of the table would have to be reviewed against the criteria of 10 CFR 50.59 to ensure the change does not create an unreviewed safety question. Additionally, it is noted that the change is consistent with the new Standard T/S, recently issued by the NRC as NUREG 1431. Based on these considerations, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The change only involves relocation of a table containing component cyclic and transient limits from the T/S to the UFSAR. No specific physical changes to the plant or changes in plant operation will result directly from this change. Any change in the limits contained in the current table will undergo a review against the requirements of 10 CFR 50.59 to ensure that the change does not create an unreviewed safety question. Thus, the change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Criterion 3

The proposed change is administrative in nature in that it simply relocates a table containing component cyclic and transient limits from the T/S to the UFSAR. Any change to the requirements of the table would have to be reviewed against the criteria of 10 CFR 50.59 to ensure the change does not create an unreviewed safety question. Additionally, it is noted that the change is consistent with the new Standard T/S, recently issued by the NRC as NUREG 1431. Based on these considerations, the proposed change does not involve a significant reduction in a margin of safety.

Lastly, we note that the NRC 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 which may result in some increase to the probability or consequences of a previously evaluated accident, but the results of which are within acceptable limits. As discussed above, the removal of the cyclic and transient limit table from the T/S is consistent with the new Standard T/S, issued by the NRC as NUREG 1431. Since the change has already been found acceptable by the NRC, we conclude that the example cited is applicable and that the change should not involve significant hazards consideration.