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DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amends to Licenses DPR=58 & DPR=74, changing Tech Spec Sections 3/4.6.5.1 = 3/4.6.5.3 for Unit 1 & Section 3/4,6.5.1 for Unit 2, to make ice condenser Tech Specs identical.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631 COLUMBUS, OHIO 43216

December 28, 1984

AEP:NRC:0900

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2 Docket Nos. 50-315 and 50-316 License Nos. DPR-58 and DPR 74 ICE CONDENSER TECHNICAL SPECIFICATION CHANGE REQUEST

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

Dear Mr. Denton:

This letter and its attachments constitute an application for amendment to the Technical Specifications (T/S) for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2. Specifically, we are proposing changes to T/S Section 3/4.6.5.1 through 3/4.6.5.3 for Unit No. 1 and T/S Section 3/4.6.5.1 for Unit No. 2. These changes are intended to make the Unit Nos. 1 and 2 Ice Condenser T/S identical.

Attachment No. 1 to this letter contains the descriptions of the proposed changes and our analyses pursuant to 10 CFR 50.92 concerning significant hazards consideration. Attachment No. 2 to this letter contains the 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 amounts of any effluents that may be released offsite, and (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), a copy of this letter and its attachments have been transmitted to Mr. George Bruchmann of the Michigan Department of Public Health and Mr. R. C. Callen of the Michigan Public Service Commission.

Pursuant to 10 CFR 170.12, we have enclosed a check in the amount of \$150.00 as payment for the application fee for the proposed T/S changes.

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Mr. Harold R. Denton

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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

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Attachment

cc: John E. Dolan

W. G. Smith, Jr. - Bridgman

R. C. Callen

G. Bruchmann

G. Charnoff

NRC Resident Inspector - Bridgman .

ATTACHMENT NO. 1 TO AEP:NRC:0900
REASONS AND 10 CFR 50.92 ANALYSES FOR THE
PROPOSED TECHNICAL SPECIFICATION CHANGES

Attachment 1 to AEP:NRC:0900 Page 1

The first proposed change is to rewrite T/S 3.6.5.1.a for both Unit Nos. 1 and 2 to read as follows: "The stored ice having a boron concentration of at least 1800 ppm (the boron being in the form of sodium tetraborate), and a pH of 9.0 to 9.5 at 25°C." Literal compliance with the current Technical Specification could result in an improper measurement of the boron concentration due to the ambiguity of the language used. This change removes this ambiguity by directly stating that it is the boron, not the sodium borate concentration that is to be measured. In addition, a temperature at which the pH of the boron solution is to be measured is specified to be 25°C. This change will not significantly affect either the boron concentration or the pH measurement. This specification will make reporting of pH values consistent with the industry practice of reporting values at 25°C. This change is primarily administrative in nature and thus, does not constitute a significant hazards consideration as defined by 10 CFR 50.92.

The second proposed change is to shorten the surveillance interval from 12 to 9 months in Unit No. 1 T/S 4.6.5.1.b. This change makes the Unit 1 T/S identical to the respective Unit 2 T/S. This proposed change constitutes a more restrictive operating requirement, and therefore does not involve a significant hazards consideration as defined by 10 CFR 50.92.

The third proposed change is to rewrite T/S 4.6.5.1.b.1 for both Unit Nos. 1 and 2 to read as follows: "Chemical analyses which verify that at least 9 representative samples of stored ice have a boron concentration of at least 1800 ppm (the boron being in the form of sodium tetraborate), and a pH of 9.0 to 9.5 at 25°C." This proposed change is consistent with the first proposed change and is primarily administrative in nature. Therefore, this proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92.

The fourth proposed change is to T/S 4.6.5.1.b.2, for Unit 1 on page 3/4 6-27. Specifically, we are proposing that the ice condenser be subdivided into three groups of baskets as follows: "Group 1 - bays 1 through 8, Group 2 bays 9 through 16, and Group 3 - bays 17 through 24," instead of "Group 1 bays 1 through 7, Group 2 - bays 8 through 14, and Group 3 - bays 15 through 24." This change will make the Unit Nos. 1 and 2 T/S identical, and will make the T/S closer to the STS for Westinghouse Pressurized Water Reactors (NUREG-0452, Revision 4). The rationale for the initial groupings in Unit No. 1 T/S was closely tied to the initial ice weighings. The ice weighings which immediately followed the initial ice loadings indicated distinct differences in the ice weights as a function of the different ice loading techniques. Therefore, the 24 bays were originally divided into three groups on the basis of their original weights. There have since been several replenishments of ice in individual baskets. Subsequent reweighings have indicated that the initial distinct differences in the ice weights between groups such as those seen after the initial weighings have been eliminated. For these reasons, regrouping the baskets as proposed will not significantly affect public health and safety. We believe acceptable operation, in the proposed manner, has been demonstrated by compliance with the identical and currently approved Unit 2 T/S. Therefore, this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

Attachment 1 to AEP:NRC:0900 Page 2

The fifth proposed change is to Unit No. 1 T/S 3.6.5.2, and is editorial in nature to make the two Units T/S read identically. Specifically, we are requesting that ACTION Statement a.3.(c) be changed to read "3 OPERABLE refrigerant units" instead of "3 OPERABLE 25 ton refrigeration chillers." This proposed change will also make the Unit NO. 1 T/S the same as the STS for Westinghouse Pressurized Water Reactors (NUREG-0452, Revision 4). This change is administrative in nature, and therefore does not involve a significant hazards consideration as defined by 10 CFR 50.92.

The sixth proposed change is to the surveillance requirements for the ice condenser inlet doors, Unit No. 1 T/S 4.6.5.3.1. We propose that the operability of the doors be demonstrated at least once per 9 months by torque testing 50% of the doors instead of at least once per 6 months with 25% of the doors being torque tested. This change would allow us to demonstrate the operability of all doors in the shorter period of one refueling cycle (i.e., approximately 18 months). In addition, this change will make the interval for the torque testing of the doors consistent with the proposed ice basket weighing surveillance requirements (i.e., at least once per 9 months). We believe the proposed change is conservative since the total number of doors would be tested over a shorter time period. These changes would make the Unit No. 1 T/S identical to the respective Unit No. 2 T/S. Therefore this change does not involve a significant hazards consideration as defined by 10 CFR 50.92.

The seventh proposed change concerns editorial changes to the Unit 1 Technical Specifications pages 3/4 6-30 through 3/4 6-32. These changes would delete obsolete statements, clarify another statement, and make the Unit 1 T/S identical to the respective Unit 2 T/S. We propose that the following words be removed from T/S's 4.6.5.3.1(b) and 4.6.5.3.2(b): "at least once per 3 months during the first year after the ice bed is fully loaded" and "thereafter." We propose T/S 4.6.5.3.2(a) be clarified to read "that opening of each door is not impaired by ice, frost or debris" instead of "free of frost accumulation." Finally, we propose that T/S 4.6.5.3.3 be revised to require the surveillance of the Top Deck Doors "once per 92 days" instead of "once per 3 months." These changes are administrative in nature, and therefore, do not involve a significant hazards consideration as defined by 10 CFR 50.92.

The eighth proposed change is to rewrite the first sentence of Technical Specification 4.6.5.1.b.3 for both Units 1 and 2 to read as follows:

Verifying, by a visual inspection of at least two flow passages per ice condenser bay, that the accumulation of frost or ice on flow passages between ice baskets, past lattice frames, through the intermediate and top deck floor grating, or past the lower inlet plenum support structures and turning vanes is restricted to a nominal thickness, of 3/8 inches. If one flow passage per bay is found to have an accumulation of frost or ice greater than this thickness, a representative sample of 20 additional flow passages from the same bay shall be visually inspected.

This change modifies the limiting ice thickness from 0.38 inches to a nominal 3/8 inches. This change is being done because the inherent nature of a visual inspection is not intended to provide accuracy to two decimal places as the current Technical Specification indicates. This change is considered primarily administrative in nature and thus, does not constitute a significant hazards consideration as defined by 10 CFR 50.92.

ATTACHMENT NO. 2 TO AEP:NRC:0900
PROPOSED TECHNICAL SPECIFICATION CHANGES