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SUBJECT: License amend request to licenses DPR-58 & DPR-74, to remove requirements for fire protection systems from licenses & TS per guidance GL-86-10, GL-88-12 & GL-93-07.

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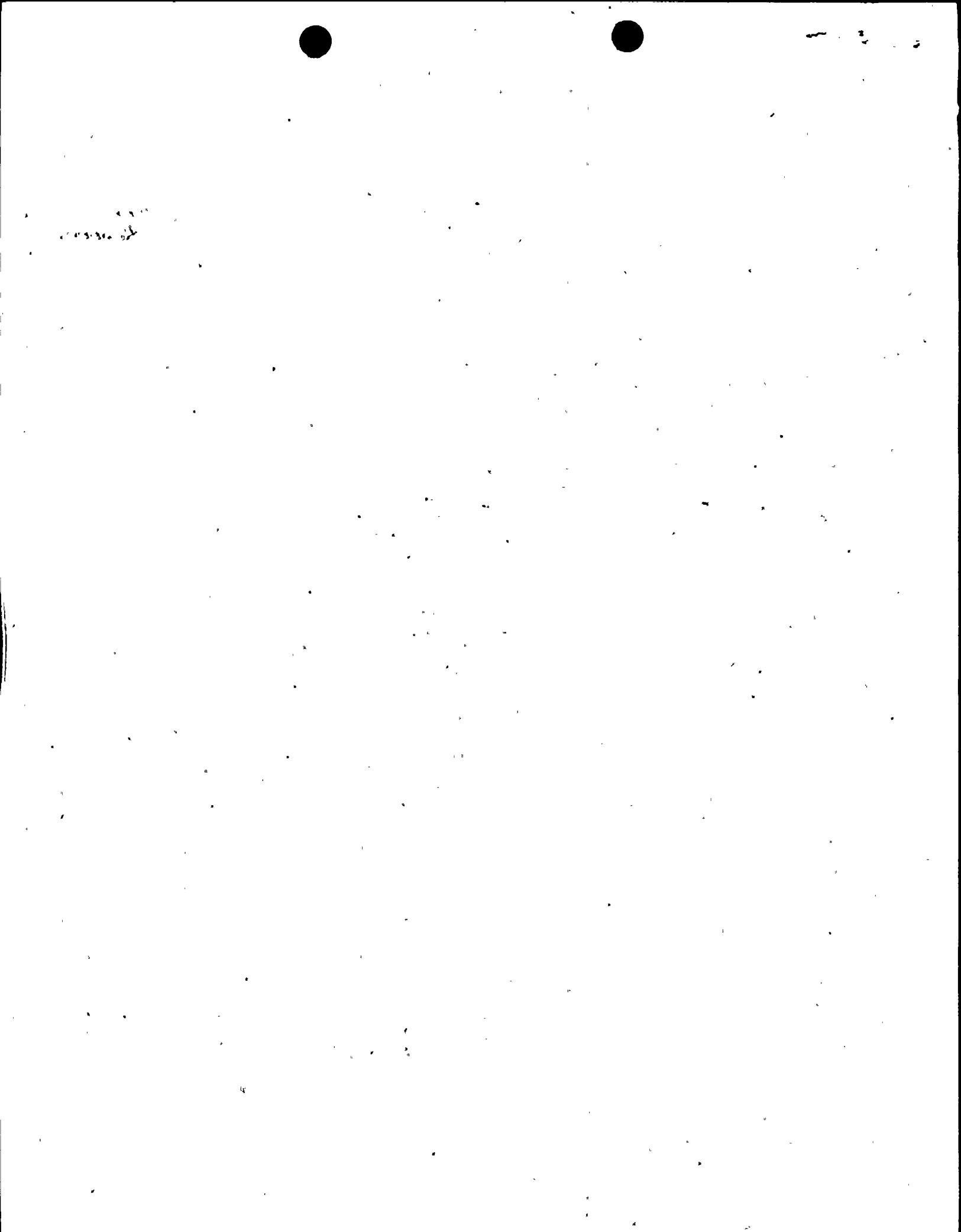
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June 20, 1995

AEP:NRC:0692CX

Docket Nos.: 50-315
50-316

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

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
LICENSE AMENDMENT REQUEST TO REMOVE
FIRE PROTECTION REQUIREMENTS FROM THE
UNIT 1 AND UNIT 2 TECHNICAL SPECIFICATIONS

This letter and its attachments constitute an application for a license amendment to the technical specifications (T/Ss) for Donald C. Cook Nuclear Plant units 1 and 2. This proposed amendment would remove the requirements for fire protection systems from the licenses and the T/Ss in accordance with the provisions and guidance of generic letters (GLs) 86-10, 88-12, and 93-07.

Attachment 1 provides a detailed description of the proposed changes, the justification for the changes, and our determination of no significant hazards consideration performed pursuant to 10 CFR 50.92. Attachment 2 contains the existing licenses and the T/S pages marked to reflect the proposed changes. Attachment 3 contains the revised licenses, the T/S pages, and a copy of the July 1994 Updated Final Safety Analysis Report pages, which reference the Fire Protection Program in greater detail. Attachment 4 details the lifetime cost savings of about \$290,000 associated with this cost beneficial licensing action.

We believe the proposed changes will not result in (1) a significant change in the types of any effluent 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 and the Nuclear Safety and Design Review Committee.

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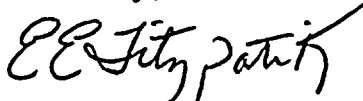
ADDCK

These proposed changes, if approved, will require numerous procedure changes to be effectively implemented. Therefore, we request a 180 day implementation date from the date of issuance.

In compliance with the requirements of 10 CFR 50.91(b)(1), copies of this letter and its attachments have been transmitted to the Michigan Public Service Commission and the Michigan Department of Public Health.

In accordance with GL 88-12, this letter provides the certification, required by 10 CFR 50.71(e)2(i), that no changes were made in the fire protection T/S requirements since the previous submittal.


Sincerely,



E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 20th DAY OF June 1995



Notary Public

My Commission Expires: 6/27/99

plt

Attachments

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



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ATTACHMENT 1 TO AEP:NRC:0692CX

DESCRIPTION OF THE PROPOSED CHANGES, THE JUSTIFICATION
FOR THE CHANGES, AND DETERMINATION OF NO SIGNIFICANT HAZARDS

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1.0 Sections to be Changed

Unit 1 License	page 4
Unit 2 License	page 5
Units 1 and 2 T/S Index;	pages V, IX, and XIII
Units 1 and 2 T/S Administrative Controls	page 6-2 and 6-13
Unit 1 T/S 3/4.3.3;	pages 3-51, 3-52, 3-53, and 3-53a
Unit 1 T/S 3/4.7.9;	pages 7-33, 7-34, 7-35, 7-36, 7-37, 7-38, 7-39, 7-40, 7-41, 7-42, 7-43, 7-44
Unit 1 T/S 3/4.7.10	pages 7-45 and 7-46
Unit 1 Bases	pages 3-6, 7-6, 7-7, 7-8, and 7-9
Unit 2 T/S 3/4.3.3;	pages 3-50, 3-51, 3-52, 3-52a
Unit 2 T/S 3/4.7.9;	pages 7-27, 7-28, 7-29, 7-30, 7-31, 7-32, 7-33, 7-34, 7-35, 7-36, 7-37, 7-38
Unit 2 T/S 3/4 7.10	7-39 and 7-40
Unit 2 Bases	pages 3-3, 7-6, 7-7, 7-8, and 7-9

2.0 Extent of Changes

This license amendment request proposes removing the requirements for fire protection from the T/Ss for Cook Nuclear Plant (CNP) units 1 and 2. This will be done in accordance with the provisions and guidance of GLs 86-10, 88-12, and 93-07.

3.0 Specific Changes Requested

We propose to make the following unit 1 and unit 2 T/S changes:

- (a) delete on Index Page V, "Fire Detection Instrumentation,"
- (b) delete on Index Page IX, T/S 3/4.7.9, "Fire Suppression Systems,"
- (c) delete on Index Page IX, T/S 3.4.7.10, "Fire Rated Assemblies,"

- (d) delete on Index Page XIII, T/S 3/4.7.9, "Fire Suppression Systems,"
- (e) delete on Index Page XIII, T/S 3.4.7.10, "Fire Rated Assemblies,"
- (f) delete from T/S page 6-2 Administrative Controls "e" and reassign e, f, and g to the remaining Administrative Controls, and
- (g) add to T/S page 6-13 Administrative Controls "g, Fire Protection Program Implementation."

We propose to make the following unit 1 T/S changes:

- (h) delete T/S pages 3/4 3-51 through 3-53a and 7-33 through 7-46, and
- (i) delete Bases 3/4.3.3.7, 3/4.7.9, and 3/4.7.10.

We propose to make the following unit 2 T/S changes:

- (j) delete T/S pages 3/4 3-50 through 3-52a and 7-27 through 7-40,
- (k) delete Bases 3/4.3.3.8, 3/4.7.9, and 3/4.7.10, and

We propose to add the following standard license condition to Section 2.C(4) of unit 1 and Section 2.C.(3)(o) of unit 2:

"Indiana Michigan Power Company shall implement and maintain, in effect, all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report for the facility and as approved in the SER dated June 4, 1979, and supplements thereto subject to the following provision:

The licensee may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire."

4.0 Discussion

The Fire Protection Program includes the fire protection and post-fire safe shutdown systems necessary to satisfy NRC guidelines and requirements; administrative and technical controls; the fire brigade and fire protection related technical staff; and other related CNP features which have been described or referenced by the licensee in the UFSAR, fire hazards analysis, responses to staff requests for additional information, comparisons of CNP designs to applicable NRC fire protection guidelines and requirements, and descriptions of the methodology for assuring safe plant

shutdown following a fire. The Fire Protection Program described in the UFSAR is not a safety-related system. The four parts of the Fire Protection Program that are being removed from the T/S are: "Fire Detection Instrumentation," "Fire Suppression Systems," "Fire Rated Assemblies," and administrative controls that deal with fire brigade staffing requirements.

GL 93-07 provides guidance for changes to T/Ss to remove the audit of the emergency and security plans and implementing procedures from the list of responsibilities of the Plant Nuclear Safety Review Committee and the Nuclear Safety and Design Review Committee provided the licensee relocates these requirements to the respective emergency and security plans. Applying this guidance to the removal of the fire protection T/S results in changes to the Fire Protection Program implementing procedures and does not require T/S administrative controls. Instead the Fire Protection Program will require these reviews. This is consistent with the current philosophy to remove extraneous material from the T/Ss. Also, the changes to the Fire Protection Program will receive a 10 CFR 50.59 review.

The "Bases" for the "Fire Suppression Systems" are to ensure the availability of adequate fire suppression capability to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, CO₂, Halon, and fire hose stations.

The "Bases" for the "Fire Rated Assemblies" are to ensure that fire damage will be limited. These design features minimize the possibility of a single fire involving more than one fire area prior to detection and extinguishment.

Justification

This proposed amendment is to remove the requirements for fire protection from the T/Ss for CNP units 1 and 2.

Specifically, this proposed amendment (1) institutes the standard license condition for a Fire Protection Program, (2) removes requirements for fire protection systems from T/Ss, (3) removes fire brigade staffing requirements from T/Ss, and (4) adds administrative controls to T/Ss that are consistent with those for other programs implemented by license condition, that is, the Fire Protection Program shall be established, implemented, and maintained by written procedures. The review of the Fire Protection Program implementing procedures by the PNSRC and the submittal of

recommendation changes to the NSDRG will not be requirements of the T/Ss but will be requirements of the Fire Protection Program. This is consistent with the guidance of GL 93-07. The reason for using the guidance of GL 93-07 is that it reflects the current philosophy to remove extraneous material from the T/Ss and GL 88-12 references the Emergency Plan and Security Plan as models to determine the appropriate administrative controls for the Fire Protection Program. Also, changes to the Fire Protection Program will receive a 10 CFR 50.59 review.

This submittal also includes the UFSAR pages which include a reference to the Fire Protection Program and to the documents that address the Fire Protection Program in greater detail. The Fire Protection Program is considered to be incorporated into the UFSAR by this reference.

This proposed amendment is in accordance with the provisions and guidance of GLs 86-10, 88-12, and 93-07.

5.0 No Significant Hazards Determination

We have evaluated the proposed T/S changes and have determined that the changes should involve no significant hazards consideration based on the criteria established in 10 CFR 50.92(c). Operation of CNP in accordance with the proposed amendment will not satisfy any of the following criteria.

- (a) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes are administrative in nature, in that it moves the T/Ss portion of the Fire Protection Program from the T/Ss to the UFSAR and the implementing procedures. This is accomplished by referencing in the UFSAR and the documents which address the Fire Protection Program in greater detail. Thus, the proposed changes will not revise the requirements for fire protection equipment operability, testing, or inspection, but only moves the T/Ss portion of the Fire Protection Program to implementing procedures.

As fire protection requirements are only being relocated following the guidance of GLs 86-10, 88-12, and 93-07, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (b) Create the possibility of a new or different kind of accident from any previously analyzed.

The proposed changes do not involve any physical alteration of plant configurations, changes to setpoints, or operating parameters. There are administrative changes that retain the existing fire protection requirements and relocate these requirements from the T/S to the UFSAR; therefore, these changes do not create the possibility of a new or different kind of accident.

- (c) Involve a significant reduction in a margin of safety.

The proposed changes follow guidance contained in GLs 86-10, 88-12, and 93-07 for incorporating the Fire Protection Program into the UFSAR. A license condition will be implemented that will require that no changes can be made to the Fire Protection Program that will adversely affect the ability to achieve or maintain safe shutdown in the event of a fire without prior NRC approval. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

6.0 Pending T/S Proposals Impacting This Submittal.

Other T/Ss submitted to the NRC but not issued at this time may impact this submittal.

ATTACHMENT 2 TO AEP:NRC:0692CX

EXISTING LICENSING AND TECHNICAL SPECIFICATIONS

PAGES MARKED TO REFLECT THE PROPOSED CHANGES