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SUBJECT: Application for amends to licenses DPR-58 & DPR-74, placing tighter restrictions on amount of time RWST water level instrumentation can be out of svc before compensatory actions are required.

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October 8, 1998

AEP:NRC:1284

Docket Nos.: 50-315
50-316

U.S. Nuclear Regulatory Commission
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Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
UNIT 1 TECHNICAL SPECIFICATION 3.3.3.8
UNIT 2 TECHNICAL SPECIFICATION 3.3.3.6
CHANGE REQUEST FOR POST-ACCIDENT INSTRUMENTATION

This letter and its attachments constitute an application for amendment to the technical specifications (T/Ss) for Donald C. Cook Nuclear Plant units 1 and 2. This amendment will place tighter restrictions on the amount of time the refueling water storage tank water level instrumentation can be out of service before compensatory actions are required.

Attachment 1 to this letter contains the reasons for the proposed changes and our analyses concerning significant hazards considerations. Attachment 2 contains the current T/S pages, marked up to reflect the proposed changes. Attachment 3 contains the proposed revised T/S pages.

Submittal of this T/S change was a commitment made to the NRC as a result of our architect engineer inspection. The commitment was made in our letter AEP:NRC:1260G2, dated January 30, 1998.

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

The proposed changes have been reviewed by the plant nuclear safety review committee and the nuclear safety and design review committee.

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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.

Sincerely,



R. P. Powers
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 8th DAY OF October 1998


Notary Public

VALERIE L. BUNNELL

My Commission Expires:

Notary Public, Berrien County, MI
My Commission Expires Sept. 5, 2002

/jmc

Attachments

c: J. A. Abramson
J. L. Caldwell, w/attachments
MDEQ - DW & RPD
NRC Resident Inspector, w/attachments
J. R. Sampson, w/attachments



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bc: T. P. Beilman, w/attachments
E. R. Eckstein/D. R. Hafer/K. R. Baker
J. J. Euto
FOLIO, w/attachments
B. J. Hickie
G. Honma
J. B. Kingseed/G. P. Arent/M. J. Gumns
J. F. Stang, Jr., NRC - Washington, DC, w/attachments

ATTACHMENT 1 TO AEP:NRC:1284

REASONS FOR PROPOSED CHANGES AND ANALYSES
CONCERNING SIGNIFICANT HAZARDS CONSIDERATION

Description of Amendment Request

This change will effect technical specification 3.3.3.8 in unit 1 and 3.3.3.6 in unit 2, "Post-Accident Instrumentation", and specifically concerns the refueling water storage tank (RWST) water level instruments. The change will reduce the out-of-service time permitted by the action statement from the current 30-days if one or both instruments are out-of-service. The revised specification will allow one of the two instruments to be out-of-service for 72 hours, provided the pump trip function initiated by the out-of-service instrument is by-passed within one hour, before the unit has to be placed in HOT STANDBY in the next 12 hours. The revision will also limit operation with both the RWST level instruments out-of-service because this condition is outside operation defined in the technical specification. Therefore, technical specification 3.0.3 will be applicable. Technical specification 3.0.3 is not applicable to the current specification.

The trip that will be by-passed by the revised technical specification is the residual heat removal (RHR) pump trip generated by the RWST water level instrument that provides protection to the RHR pump from a loss of suction. A nominal level of 10% as read on the RWST water level instrument will trip the RHR pump associated with the instrument. The emergency operating procedure (EOP) that addresses the switchover from injection to recirculation stops the RHR pumps at a nominal RWST water level of 20% before the trip setpoint is reached. The by-passing of the trip of the RHR pump from the RWST water level instrument when the instrument is out-of-service enhances the availability of the RHR pump to fulfill its safety function of water injection in response to a safety injection signal without appreciably increasing the jeopardy to the pump.

Background and Reason for Change

This change is being requested in response to an observation made during the recent architect engineer (AE) inspection. An inspector questioned why the out of service time constraints for the RWST water level instruments were less conservative than for other emergency core cooling system (ECCS) sub-systems. The RWST water level has no automatic engineered safety function, but is used to initiate switchover from injection to recirculation phase following a loss of coolant accident. The submittal of this T/S change request was a commitment made to the NRC in response to the AE inspection in our letter AEP:NRC:1260G2, dated January 30, 1998.

The requested change brings the allowable out of service time for the RWST level instruments into alignment with the out of service time constraints applied to other ECCS sub-systems.

Basis for No Significant Hazards Determination

In accordance with 10 CFR 50.92, the proposed changes do not involve a significant hazards consideration if the changes do 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

This amendment request does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed changes do not change or add to any of the accidents previously evaluated. The T/S changes do not change the available instrumentation nor change the readability of the instrumentation. The T/S changes make the allowable out of service time more conservative for the RWST water level instrumentation, reducing the allowable time from 30-days to 72-hours for a single channel out-of-service, with T/S 3.0.3 being entered if both channels of instrumentation are lost.

Criterion 2

The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated. The T/S change only reduces the allowable out of service time for the RWST water level instrumentation. It does not involve a physical change and does not create a new type of accident.

Criterion 3

This proposed change does not involve a significant reduction in a margin of safety. The T/S change is limited to the allowable out of service time and does not change the number of instrument channels available, the testing of the instruments or the range of the instruments.