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Records Management Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-58 & DPR-74,revising TS Surveillance Requirement 4.6.2.2.d for spray additive sys to relocate details associated with acceptance criteria & test parameters to associated TS Bases.

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C1099-07
10 CFR 50.90

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50-316

U.S. Nuclear Regulatory Commission
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Donald C. Cook Nuclear Plant Units 1 and 2
TECHNICAL SPECIFICATION CHANGE REQUEST
SPRAY ADDITIVE SYSTEM SURVEILLANCE REQUIREMENT

Pursuant to 10 CFR 50.90, Indiana Michigan Power Company (I&M), the Licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, proposes to amend Appendix A, Technical Specifications (T/S), of Facility Operating Licenses DPR-58 and DPR-74. I&M proposes to revise T/S Surveillance Requirement 4.6.2.2.d for the spray additive system to relocate the details associated with the acceptance criteria and test parameters to the associated T/S Bases. Additionally, certain administrative text format changes are also being proposed. I&M requests approval of this request by December 10, 1999, to support activities associated with the restart of Unit 2.

I&M is adopting the approach established in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants, Specifications," Revision 1, for the associated requirement. Relocating the information to the T/S Bases permits the values to be controlled under the provisions of 10 CFR 50.59. I&M has identified that such a change may be needed to permit implementation of a plant modification that improves the testing capability for the containment spray pumps.

The existing plant design does not permit testing the containment spray pumps at the design flow rate and results in operation of the pumps at significantly reduced flow, resulting in increased pump vibration levels. Completion of the modification will provide improved testing capability by permitting testing at the design flow rate. However, this modification is also expected to preclude establishing the currently specified containment spray pump discharge pressure test point and may affect the currently specified test acceptance criteria. This amendment will permit timely modifications of the relocated parameters under the provisions of 10 CFR

A001

50.59. If this amendment request is approved, I&M requests a 30 - day implementation period from the date of issuance.

Attachment 1 provides a description and safety analysis to support the proposed changes. Attachments 2A and 2B provide marked-up T/S pages for Unit 1 and Unit 2, respectively. Attachments 3A and 3B provide the proposed T/S pages with the changes incorporated for Unit 1 and Unit 2, respectively. Attachment 4 describes the evaluation performed in accordance with 10 CFR 50.92(c), which concludes that no significant hazard is involved. Attachment 5 provides the environmental assessment.

One previous submittal, AEP:NRC:433Q dated December 3, 1998, affects Unit 2 T/S page 3/4 6-12 that is submitted in this request. The previous submittal deletes an obsolete footnote associated with certain 18-month surveillance requirements that were delayed until a refueling outage scheduled to begin in August, 1994. The T/S pages in attachments 2B and 3B do not reflect the change proposed in the previous submittal. I&M will coordinate changes to the pages with the NRC Project Manager to ensure proper T/S page control when the associated license amendment requests are approved. No commitments are identified in this submittal.

Copies of this letter and its attachments are being transmitted to the Michigan Public Service Commission and Michigan Department of Public Health, in accordance with the requirements of 10 CFR 50.91.

Should you have any questions, please contact Mr. Robert C. Godley, Director of Regulatory Affairs, at (616) 466-2698.

Sincerely,

Michael W. Rencheck
Vice President Nuclear Engineering

\dms

Attachments

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 12th DAY OF October, 1999

Patricia A. Eddie
Notary Public

My Commission Expires

PATRICIA A. EDDIE
NOTARY PUBLIC - BERRIEN CO. MICH
MY COMMISSION EXPIRES
NOVEMBER 5, 2000

c: J. E. Dyer, w/attachments
MDEQ - DW & RPD, w/attachments
NRC Resident Inspector, w/attachments
R. Whale, w/attachments

ATTACHMENT 1 TO C1099-07

DESCRIPTION AND SAFETY ANALYSIS FOR THE PROPOSED CHANGES

A. Summary of the Proposed Changes

Indiana Michigan Power Company (I&M), the Licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, proposes to amend Appendix A, Technical Specifications (T/S), of Facility Operating Licenses DPR-58 and DPR-74. I&M proposes to revise T/S Surveillance Requirement (SR) 4.6.2.2.d for the spray additive system to relocate the details associated with the acceptance criteria and test parameters to the associated T/S Bases. Additionally, certain administrative text format changes are also being proposed.

The proposed changes are described in detail in Section E of this attachment. T/S pages that are marked to show the proposed changes are provided in Attachments 2A and 2B for Unit 1 and Unit 2, respectively. Note that these pages may reflect formatting that differs slightly from the current pages. These format changes are intended to improve appearance and are not intended to introduce other changes. The proposed T/S pages, with the changes incorporated, are provided in Attachments 3A and 3B for Unit 1 and Unit 2, respectively.

B. Description of the Current Requirements

T/S SR 4.6.2.2.d requires that at least once every 5 years, the water flow from the spray additive tank test line to each containment spray system (CTS) be verified to be greater than or equal to 20 gallons per minute (gpm) and less than or equal to 50 gpm. This surveillance requires this test to be performed when the spray pump is operating on recirculation with a pump discharge header pressure greater than or equal to 255 pounds per square inch gauge (psig).

C. Bases for the Current Requirements

The purpose of the spray additive system flow rate SR 4.6.2.2.d is to ensure that the correct pH level is established in the borated water solution provided by the CTS. This surveillance requirement provides assurance that the correct amount of sodium hydroxide will be metered into the flow path upon CTS initiation. Proper pH is important for post-accident iodine scrubbing by the CTS and for minimizing corrosion effects on components within the containment. The values for the test parameters and acceptance criteria are based on hydraulic characteristics of the piping system and the necessary post-accident containment spray pH levels.

D. Need for Revision of the Requirement

Current plant design does not permit testing the containment spray pumps at the design flow rate. The flow capability during testing is limited by the size of the piping providing the flowpath during recirculation. This limitation requires operating the pumps under low flow conditions and results in increased levels of pump vibration during the test. Operating the pumps in this manner is undesirable because it can result in pump vibration exceeding the ASME code limitation, and can potentially contribute to long term degradation of the containment spray pumps. To correct this condition, a plant modification is being implemented to provide increased flow capability for the containment spray pumps when they are operated for testing in recirculation. This modification affects the hydraulic characteristic of the flow path that is used when the pumps are operated for testing purposes. The modification permits the pumps to be tested at design flow rates and is intended to eliminate the undesirable pump vibration associated with pump testing at reduced flow. This modification is expected to preclude establishing the current T/S required test condition for the containment spray pump's discharge pressure of greater than or equal to 255 psig without requiring substantial throttling of the pumps flow. Throttling the pumps to achieve the specified discharge pressure negates the benefit of the modification that provides design flow rate test capability.

Reanalysis of the effects of the spray additive system on the containment sump's pH under post-accident conditions is also being performed to resolve other containment issues unrelated to the modification. The initial evaluation indicates that an increased maximum flow rate from the spray additive tank to the containment spray flowpath may be necessary. Relocation of the test parameters from the T/S to the associated T/S Bases permits timely revision of these parameters, as required, upon completion of the analyses and calculations.

E. Description of the Proposed Changes

I&M proposes to relocate the test parameters and the acceptance criteria from T/S SR 4.6.2.2.d to the associated T/S Bases. The revised surveillance requirement specifies demonstrating the spray additive system is operable, " . . . by verifying the flow rate from the spray additive tank test line to each containment spray system with the spray pump operating on recirculation." Editorial changes are made in the relocated paragraph for clarity and for grammatical completeness.

I&M is also proposing certain format changes affecting each page include minor differences in margins and text spacing due to variations in word processing and reprographic technologies. In addition there are specific format changes affecting the Unit 2 bases page B 3/4 6-3. These specific changes include (1) the use of a different font which also results in altered spacing of the text on the page and content for each line of text, (2) the use of horizontal bars to separate the footer and header from the body of the page, (3) the addition of numerical annotation (i.e., 3/4 and 3/4.6 in the header text lines), (4) the removal of underlining from the two lines of header text, (5) the reversal of sequence and deletion of a blank line between the two lines of header

text, (6) the removal of spaces immediately preceding and following the hyphen in the footer text, "COOK NUCLEAR PLANT-UNIT 2," (7) the addition of the word "Page" prior to the page number, and (8) the removal of the word "NO." following the word "AMENDMENT" and prior to the historical and current amendment numbers.

F. Bases for the Proposed Changes

The relocation of details associated with SR 4.6.2.2.d is appropriate because these details are not required to be in the T/S to provide adequate protection of the public health and safety and the T/S still retains the requirement for system operability. Only the location of the requirement is changed (T/S Bases versus the T/S). The control of changes to these testing details is also modified since changes to the T/S require NRC approval while the T/S Bases may be modified in accordance with the provisions of 10 CFR 50.59. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. Changes to the T/S Bases are controlled by the provisions of the 10 CFR 50.59, "Changes, Tests and Experiments."

This revised SR is consistent with the associated requirement, SR 3.6.7.5, in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants, Specifications," Revision 1. SR 3.6.7.5 specifies neither a discharge pressure test value nor any acceptance criteria. The Improved Standard Technical Specification (ISTS) were developed by the associated Owner's Groups and have been accepted by the NRC for use by licensees in conversion to the ISTS.

The changes in format of the text on each page are administrative and do not result in any change in the actual requirements.

G. Impact on Previous Submittals

One previous submittal, AEP:NRC:433Q dated December 3, 1998, affects Unit 2 T/S page 3/4 6-12 that is submitted in this request. The previous submittal deletes an obsolete footnote associated with certain 18-month surveillance requirements that were delayed until a refueling outage scheduled to begin in August, 1994. The T/S pages in attachments 2B and 3B do not reflect the change proposed in the previous submittal. I&M will coordinate changes to the pages with the NRC Project Manager to ensure proper T/S page control when the associated license amendment requests are approved.