



AEP:NRC:1137A

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and CPR-74
CORRECTIONS TO MISCELLANEOUS ADMINISTRATIVE
TECHNICAL SPECIFICATION CHANGE REQUEST

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

Attn: T. E. Murley

September 13, 1991

Dear Dr. Murley:

During a recent telephone conference, your staff identified several editorial comments on our letter AEP:NRC:1137, "Miscellaneous Administrative Technical Specification Change Request," dated February 15, 1991. The purpose of this letter is to incorporate those editorial comments and provide the technical specification (T/S) pages as agreed upon with your staff. In reviewing these comments with your staff, we also agreed to make two additional changes. A description of the proposed changes, our reasons for the changes, and our analysis concerning significant hazards considerations are included in Attachment 1. The proposed revised T/Ss pages are contained in Attachment 2. Attachment 3 consists of the existing T/Ss pages marked to reflect how they will be impacted by this proposed amendment.

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 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 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 the Michigan Department of Public Health.

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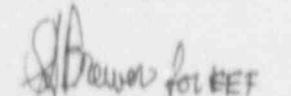
Dr. T. E. Murley

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This document has been prepared following Corporate procedures that incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,


E. E. Fitzpatrick
Vice President

ldp

Attachments

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
A. B. Davis - Region III
NFEM Section Chief
NRC Resident Inspector - Bridgman

ATTACHMENT 1 TO AEP:NRC:1137A

REASONS AND 10 CFR 50.92 ANALYSES FOR CHANGES TO THE

DONALD C. COOK NUCLEAR PLANT UNITS 1 AND 2

TECHNICAL SPECIFICATIONS

The proposed changes in this Technical Specifications (T/Ss) change request are purely administrative. A description of each proposed change is given below.

- 1) Incorporate subparagraph (e) as subparagraph (d)
Unit 1, Table 4.3-2, page 3/4 3-33

Item 4, subparagraph (d), is being revised to read "Steam Flow in Two Steam Lines-- High Coincident with T_{avg}--Low-Low or Steam Line Pressure-- Low. In our previous submittal, Steam Line Pressure -- Low was inadvertently numbered as a separate subparagraph (e).

- 2) Delete T/S 4.6.1.3.a and the subsequent paragraphs
Unit 1 page 3/4 6-4 and 6-5

The requirement to visually inspect each containment air lock after each opening to verify that the seal has not been damaged was imposed during initial plant startup. The purpose for the visual inspection immediately after each opening is unknown because any physical damage to the seal is more likely to occur while the doors are open. The seals, therefore, are checked, by procedure, before door closure to ensure integrity for pressurization tests.

- 3) Delete the asterisk and the reference from T/S 4.6.1.3.b
Unit 1 page 3/4 6-4.

The reference to an exemption from Appendix J of 10 CFR 50 is no longer required because Appendix J has been revised to allow for multiple entries into the air lock and for a modified leak rate test once per 3 days.

- 4) Revise 4.6.1.3.b Unit 1 p. 3/4 6-5

The reference to 4.6.1.3.b must be changed to 4.6.1.3.a because b. was renumbered to a. as a result of the deletion. Change gap to volume and insert door in front of seals.

- 5) Revise Item 17, subparagraph (A)
Unit 2, Table 2.2-1, page 2-6.

Item 17, subparagraph (A) is being revised from "Low Trip System Pressure" to "Low Fluid Oil Pressure." The table was inadvertently not sent with our previous submittal.

- 6) Delete the asterisk and the reference from T/S 4.6.1.3a
Unit 2 page 3/4 6-4

The reference to an exemption from Appendix J of 10 CFR 50 is no longer required because Appendix J has been revised to

allow for multiple entries into the air lock and for a modified leak rate test once per 3 days.

- 7) Revise T/S 4.6.1.3 subparagraph (a)
Unit 2 page 3/4 6-4

T/S 4.6.1.3, subparagraph (a), is being revised to read,
". . . when it shall be done at least once per 3 days . . ."
rather than "once per 72 hours." This change provides
consistency between units.

Analysis of Significant Hazards

Per 10 CFR 50.92, a proposed amendment will involve no significant hazards considerations if the proposed amendment 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 analyzed or evaluated, or
- (3) involve a significant reduction in a margin of safety.

Criterion 1

The proposed changes are purely administrative and are intended to correct errors or problems in the T/Ss. Therefore, we believe these changes do not involve a significant increase in the probability or consequences of a previously analyzed accident.

Criterion 2

Since the proposed changes are purely administrative and introduce no new operating conditions, we believe that these changes will not create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

For the reasons cited in Criterion 1 above, we believe that the proposed changes will not result in a significant reduction in the margin of safety.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples of amendments not likely to involve significant hazards considerations. The first example is that of a purely administrative change to the T/Ss; for example, a change to achieve consistency throughout the T/Ss, correction of an error, or change in nomenclature. We believe that the changes requested in this letter are of the type specified in this example, since they are intended to correct errors and problems in the T/Ss. Therefore, we believe this change involves no significant hazards considerations as defined in 10 CFR 50.92.