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NRC Project Director: William D. Beckner

Indiana Michigan Power Company, Docket Nos. 50-315 and 50-316, Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2, Berrien County, Michigan

Date of amendment requests: March 31, 1995

Description of amendment requests: The proposed amendments would modify the technical specifications to eliminate the requirement to test certain safeguards pumps via their recirculation flowpath. The affected pumps are the centrifugal charging pumps, residual heat removal pumps, motor driven auxiliary feedwater pumps, and the turbine driven auxiliary feedwater pumps. The proposed amendments would also eliminate references to specific discharge pressures and flows associated with these pumps and remove footnotes associated with the Unit 2 cycle 9-10 refueling outage which are no longer applicable.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

Per 10 CFR 50.92, a proposed change does not involve a significant hazards consideration if the change 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 evaluated, or
3. involve a significant reduction in a margin of safety.

Criterion 1

The purpose for conducting periodic testing of the pumps identified in this proposed amendment is to detect gross degradation as required by Section XI of the ASME [American Society of Mechanical Engineers] Code. The Cook Nuclear Plant IST [Inservice Testing] program, which encompasses Section XI of the ASME Code, is the basis for the existing as well as the proposed T/Ss. Testing the pumps utilizing a high capacity flowpath instead of a recirculation flow path (where applicable) will have no impact on the ability of the pump to perform its intended function. In fact, it is expected that the high capacity flowpath will provide a more accurate assessment of the pump/systems' conditions and ability to meet their safety function.

The removal of specific test parameters, in favor of referencing the Cook Nuclear Plant

IST Program, will not impact the ability of the pumps to perform their safety related function. IST Program parameters ensure that the pumps under test provide the support assumed in the plant's safety analyses.

Therefore, based on these considerations, it is concluded that the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The proposed change will preclude the need to realign selected pumps to their recirculation flowpaths for testing purposes (where applicable). Eliminating the need for alignment to the recirculation flowpath aids in maximizing the pump's availability to perform its safety function.

As stated previously the removal of the specific test parameters, in favor of referencing the Cook Nuclear Plant IST Program will not impact the ability of the pumps to perform their intended safety function.

Thus, it is concluded that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Criterion 3

As stated previously, testing of the selected pumps utilizing a high capacity flowpath will provide greater assurance of pump capability and maximize pump availability. Additionally, removing specific test parameters in favor of referencing the Cook Nuclear Plant IST Program will have no impact on the ability of the pumps to perform their intended safety function. Therefore, we believe that the margin for safety as defined in 10 CFR [Part] 100 has not been reduced. Based on these considerations, it is concluded that the changes do not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Although not specifically addressed in the licensee's analysis, the elimination of specific discharge pressures and flows is encompassed in the elimination of the recirculation testing requirement and presents no additional significant hazards consideration. Therefore, the NRC staff proposes to determine that the amendment requests involve no significant hazards consideration.

Local Public Document Room location: Maud Preston Palenske Memorial Library, 500 Market Street, St. Joseph, Michigan 49085

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NRC Project Director: Cynthia A. Carpenter, Acting

Indiana Michigan Power Company, Docket Nos. 50-315 and 50-316, Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2, Berrien County, Michigan

Date of amendment requests: May 19, 1995

Description of amendment requests:

The proposed amendments would modify the Technical Specification action statement associated with the Main Steam Safety Valves (MSSVs). The action statement would reflect different requirements based on operating Mode and the power range neutron flux high setpoint with inoperable MSSVs would be revised in response to an issue raised in Westinghouse Nuclear Safety Advisory Letter 94-001.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

Per 10 CFR 50.92, a proposed change does not involve a significant hazards consideration if the change 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 evaluated, or
3. involve a significant reduction in a margin of safety.

Criterion 1

Correction of the setpoint methodology does not represent a credible accident initiator. The new methodology reduces the allowable power level setpoints and is conservative compared to the presently evaluated setpoints. The consequences of any previously evaluated accident are not adversely affected by this action because the decrease in the setpoints resulting from the new calculational methodology will ensure that the MSSVs are capable of relieving the pressure at the allowable power levels. Based on these considerations, it is concluded that the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Correcting the overly restrictive action statements of T/S 3.7.1 does not involve a significant increase in the probability of an accident. The proposed changes modify existing text to more accurately reflect the intention of the restrictions imposed by the action statements. The changes do not create any situation that would initiate a credible accident sequence.

Criterion 2

The change in Table 3.7-1 reduces the allowable power levels that can be achieved in the event that one or more main steam safety valve(s) is inoperable. This change is a result of vendor guidance to correct an error in the existing methodology used to determine the setpoints for the power level. Changing the methodology used to determine the setpoints, and lowering the setpoints themselves, do not create a new condition