

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 26, 1995 (AEP:NRC:1210).

Description of amendment requests: The proposed amendments would modify the Reactor Trip System Instrumentation and Engineered Safety Feature Actuation System Instrumentation sections of the Technical Specifications (TS) to relocate the tables of response time limits to the Updated Final Safety Analysis Report (UFSAR). These changes are a line item improvement of the TS in accordance with NRC Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits."

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 amendment will not involve a significant hazards consideration 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 evaluated, or
- (3) Involve a significant reduction in a margin of safety.

Criterion 1

The proposed changes will not involve a significant increase in the probability of an accident previously evaluated because the changes will not result in a change to any of the process variables that might initiate an accident. There are no physical changes to the plant associated with the T/S change. The consequences of an accident previously evaluated will not be increased because the changes simply allow relocation of response time limits to the UFSAR. Time response testing will continue to be required by the T/Ss. Any changes to the response time values will be made in accordance with the requirements of 10 CFR 50.59. It is noted that these T/S changes have previously been determined acceptable by the NRC in GL 93-08.

Criterion 2

The proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated because the changes will involve no physical changes to the plant nor any changes in plant operations. Time response testing will continue to be required by the T/Ss. Any changes to the time response values will be made in accordance with the requirements of 10 CFR 50.59. It is noted that these changes have previously been

determined acceptable by the NRC in GL 93-08.

Criterion 3

The proposed amendment will not involve a significant reduction in a margin of safety because time response testing will continue to be required by the T/Ss. Any changes to the response time values will be made in accordance with the requirements of 10 CFR 50.59. It is noted that these changes have previously been determined acceptable by the NRC in GL 93-08.

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. 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.

Attorney for licensee: Gerald Charnoff, Esq., Shaw, Pittman, Potts and Trowbridge, 2300 N Street, NW, Washington, DC 20037.

NRC Project Director: Cynthia A. Carpenter, Acting.

North Atlantic Energy Service Corporation, Docket No. 50-443, Seabrook Station, Unit No. 1, Rockingham County, New Hampshire

Date of amendment request: May 30, 1995.

Description of amendment request: The proposed amendment would change the upper limit for the moderator temperature coefficient (MTC) for certain operating conditions. Specifically, the upper limit specified in Technical Specification 3.1.1.3 for the MTC would be changed to $+0.5 \times 10^{-4}$ delta k/k/°F for all rods out at the beginning of cycle for power levels up to 70% rated thermal power with a linear ramp to 0 delta k/k/°F at 100% rated thermal power. The currently specified upper limit for all operating conditions is 0 delta k/k/°F.

A paragraph would be added to the Basis to Technical Specification 3.1.1.3 providing a commitment to comply with the ATWS Rule and the basis for the Rule by assuring ATWS core damage frequency will remain below the Commission established target of 1.0×10^{-5} per reactor year. The commitment would be implemented by determining a more restrictive, cycle-specific upper MTC limit and placing it in the Core Operating Limits Report (COLR).

Additionally, a reference for the analytical method used to determine the cycle-specific MTC upper limit would be added to TS 6.8.1.6.b.

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. The NRC staff has reviewed the licensee's analysis against the standards of 10 CFR 50.92(c). The NRC staff's review is presented below.

A. The changes do not involve a significant increase in the probability or consequences of an accident previously evaluated (10 CFR 50.92(c)(1)). The proposed changes do not affect the manner by which the facility is operated and do not change any facility design feature or equipment which influences the initiation of an accident, therefore, there is no change in the probability of any accident previously analyzed. Each accident or transient, with the exception of the Anticipated Transient Without SCRAM (ATWS), has been analyzed for the proposed changes and has been approved previously by the Commission with the issuance of Amendment 33 (December 6, 1994) to the Facility Operating License. The proposed cycle-specific MTC to be included in the COLR will assure that the consequences of an ATWS will remain bounded by the analysis previously documented. Therefore, the consequences of previously evaluated accidents, including ATWS, will not be significantly increased by the proposed changes.

B. The changes do not create the possibility of a new or different kind of accident from any accident previously evaluated (10 CFR 50.92(c)(2)) because the changes proposed merely involve changes in the upper limits of MTC imposed by the Technical Specifications and COLR. No changes are made to the design or manner of operation of any structure, system or component and no new failure mechanisms are introduced.

C. The changes do not involve a significant reduction in a margin of safety (10 CFR 50.92(c)(3)). The analyses of each accident or transient previously presented to support the issuance of Amendment 33 were performed using the proposed upper MTC limit, and the results demonstrated that the acceptance criteria specified for each event are met. The cycle-specific MTC limit in the COLR will be adjusted to assure that the acceptance criteria for a postulated ATWS event are met thereby preserving the margin of safety.

Based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.