Indiana Michigan
Power Company
Cook Nuclear Plant
500 Circle Drive
Buchanan, MI 49107
(616) 465-5901

INDIANA MICHIGAN POWER

April 20, 2001

C0401-03
10 CFR 50.90

Docket No.: 50-316

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Unit 2
SUPPLEMENT TO LICENSE AMENDMENT REQUEST
EXTENSION OF EMERGENCY DIESEL GENERATOR ENGINE
AND BATTERY SURVEILLANCE REQUIREMENTS
(TAC No. MB1082)

Reference: Letter from R. P. Powers, Indiana Michigan Power Company, to U. S. Nuclear Regulatory Commission Document Control Desk (NRC), "License Amendment Request Extension of Emergency Diesel Generator Engine and Battery Surveillance Requirements," C0101-06, dated January 19, 2001.

In the referenced letter, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant Unit 2, proposed to amend Facility Operating License DPR-74 to permit a one-time extension of the interval for Technical Specification (T/S) surveillance requirement (SR) 4.8.1.1.2.e.1. In that license amendment request, I&M inadvertently omitted SR 4.8.1.1.2.e.7, a SR associated with the diesel generator, which is also required to be performed every eighteen months during shutdown. I&M is, therefore, revising the previously submitted license amendment request to include SR 4.8.1.1.2.e.7.

The evaluation performed in accordance with 10 CFR 50.92(c) provided in Attachment 2 to the referenced letter demonstrates that no significant hazard is involved for extending the surveillance interval for SR 4.8.1.1.2.e.1. That evaluation remains valid for the inclusion of SR 4.8.1.1.2.e.7 in the license amendment request. This is described in detail in Section D of the attachment to this letter. I&M has reviewed the environmental assessment provided in Attachment 3 of the referenced letter and has concluded that it is not affected. This letter does not contain any new commitments.

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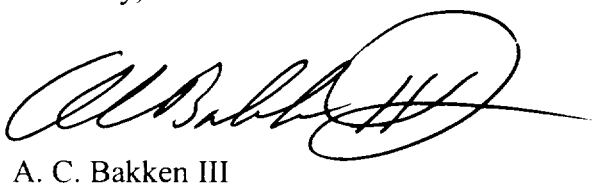
Should you have any questions, please contact Mr. Ronald W. Gaston, Manager of Regulatory Affairs, at (616) 697-5020.

Sincerely,



A. C. Bakken III
Site Vice President

/dmb

Attachment

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

AFFIRMATION

I, A. Christopher Bakken III, being duly sworn, state that I am Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

Indiana Michigan Power Company

A. C. Bakken III
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 20 DAY OF APRIL, 2001

Jennifer L Kernosky
Notary Public

My Commission Expires 5/26/05

JENNIFER L KERNOSKY
Notary Public, Berrien County, Michigan
My Commission Expires May 26, 2005

ATTACHMENT TO C0401-03
SUPPLEMENT TO LICENSE AMENDMENT REQUEST
DIESEL GENERATOR SURVEILLANCE INTERVAL EXTENSION

A. Background

On January 19, 2001, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant Unit 2, proposed to amend Facility Operating License DPR-74 to permit a one-time extension of the interval for Technical Specification (T/S) surveillance requirement (SR) 4.8.1.1.2.e.1. In that license amendment request, I&M inadvertently omitted SR 4.8.1.1.2.e.7, a SR associated with the diesel generator, which is also required to be performed every eighteen months during shutdown. I&M is, therefore, revising the previously submitted license amendment request to include SR 4.8.1.1.2.e.7.

B. Proposed Revision to Previous Request

I&M proposes to include SR 4.8.1.1.2.e.7 in the revised license amendment request. SR 4.8.1.1.2.e.7 requires that the diesel generator be run for a minimum of 8 hours at a power factor less than or equal to 0.86. During this test, the EDG is to be loaded to 3500 kw. Within 5 minutes after completing the 8-hour test, the EDG is to be started from standby conditions and verified to achieve 4160 volts and a frequency of 60 Hertz within 10 seconds. The proposed wording for the requested license amendment is as follows:

"The emergency diesel generator engine Technical Specification surveillance requirements of 4.8.1.1.2.e.1 and 4.8.1.1.2.e.7 have been extended to allow their performance during refueling outage 13, but no later than December 31, 2001."

C. Basis for the Proposed Revision

The purpose of SR 4.8.1.1.2.e.7 is to test the EDG under load conditions that are as close to design conditions as possible. The eighteen-month frequency is consistent with expected fuel cycle lengths and NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 1, SR 3.8.1.14.

The extension of the interval for performing SR 4.8.1.1.2.e.7 will not reduce the expectation that the EDGs will perform their intended function during the additional period before the surveillance is conducted. The AB EDG was last tested on September 14, 1999, and the CD EDG was last tested on October 8, 1999. The required dates for the testing to be performed are July 31, 2001 and August 24, 2001, respectively. These dates include the 25% allowance allowed by T/S 4.0.2. Thus, the proposed revision would extend the eighteen-month surveillance interval, which is permitted to be as long as 22.5 months based on T/S 4.0.2, to a maximum one-time interval of less than 29 months for the AB and CD EDGs.

As described in detail in the original license amendment request, the EDG engines have demonstrated reliability by meeting performance goals specified in the CNP Maintenance Rule

program, the CNP Station Blackout Reliability program, and the CNP T/S Surveillance program. That demonstrated reliability also supports the SR 4.8.1.1.2.e.7 extension. Additionally, monthly SRs (4.8.1.1.2.a.4 and 4.8.1.1.2.a.5) verify that the diesel will operate for equal to or greater than 60 minutes when loaded to 3500 kw.

D. Comparison to No Significant Hazards Evaluation

The proposed changes do not affect the original evaluation performed in accordance with 10 CFR 50.92.

The original EDG related response to Question 1 is as follows:

"The proposed license conditions do not affect or create any accident initiators or precursors. As such, the proposed license conditions do not increase the probability of an accident. The proposed license conditions do not involve operation of the required electrical power sources in a manner or configuration different from those previously recognized or evaluated.

The proposed EDG engine SR revision involves deferral of the SR 4.8.1.1.2.e.1 requirement to the next refueling outage and does not reduce the required operable power sources of the Limiting Condition for Operation, does not increase the allowed outage time of any required operable power supplies, and does not reduce the requirement to know that the deferred SRs could be met at all times. Deferral of the testing does not increase by itself the potential that the testing would not be met. The monthly EDG engine starts, fuel level checks, and fuel transfer pump checks will continue to be performed to provide adequate confidence that the required EDG engine will be available and the previously evaluated consequences will not be increased.

Therefore, based on the above discussion, it is concluded that the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated."

The deferral of SR 4.8.1.1.2.e.7 does not require a different response to this question as the basis for the response remains the same and continues to be valid. The proposed revision does not increase the probability of occurrence or the consequences of accidents previously evaluated.

The original EDG related response to Question 2 is as follows:

"The proposed license condition does not involve a physical alteration of the EDG engines or a change to the way the A.C. power system is operated. The proposed license condition does not involve operation of the required electrical power sources in a manner or configuration different from those previously recognized or evaluated. No new failure mechanisms of the A.C. power supplies are introduced by the extension of the SR intervals."

The deferral of SR 4.8.1.1.2.e.7 does not require a different response to this question as the basis for the response remains the same and continues to be valid. The proposed revision does not create the possibility of a new or different kind of accident from any accident previously analyzed.

The original EDG related response to Question 3 is as follows:

"Deferral of the specified EDG engine SR does not introduce by itself a failure mechanism, and past performance of the SR has demonstrated reliability in passing the deferred SRs. The required operable power supplies have not been reduced. Therefore, the availability of power supplies assumed for accident mitigation is not significantly reduced and previous margins of safety are maintained."

The deferral of SR 4.8.1.1.2.e.7 does not require a different response to this question as the basis for the response remains the same and continues to be valid. The proposed revision does not significantly decrease the margin of safety.