



October 12, 2001

C1001-06  
10 CFR 50.90

Docket Nos.: 50-315  
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 Units 1 and 2  
TECHNICAL SPECIFICATION CHANGE REQUEST TO ELIMINATE  
REQUIREMENTS FOR POST ACCIDENT SAMPLING SYSTEMS USING  
THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

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 (TS), of Facility Operating Licenses DPR-58 and DPR-74. I&M proposes to delete TS 6.8.3 requiring a program for post accident sampling, and thereby eliminate the requirements to have and maintain the Post Accident Sampling System at CNP Units 1 and 2. The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this TS improvement was announced in the Federal Register, Volume 65, Number 211, on October 31, 2000, as part of the Consolidated Line Item Improvement Process.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachments 2A and 2B provide a marked-up TS page for Unit 1 and Unit 2, respectively. Attachments 3A and 3B provide the proposed TS page with the changes incorporated for Unit 1 and Unit 2, respectively. Attachment 4 provides a summary of the regulatory commitments made in this submittal.

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I&M requests NRC review and approval in accordance with normal NRC review schedules for this type of request, and requests a 120-day implementation period following approval.

No previous submittals affect TS pages that are included in this request. If any future submittals affect these TS pages, then I&M will coordinate changes to the pages with the NRC Project Manager to ensure proper TS page control when the associated license amendment requests are approved.

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

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

Sincerely,



M. W. Rencheck  
Vice President Nuclear Engineering

\dmb

Attachments

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

**AFFIRMATION**

I, Michael W. Rencheck, 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.

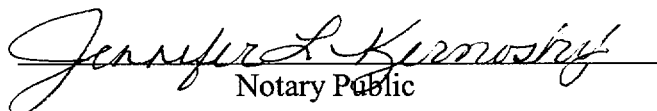
Indiana Michigan Power Company



M. W. Rencheck  
Vice President Nuclear Engineering

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 12 DAY OF October, 2001

  
Notary Public

My Commission Expires 5/24/05

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

bc: P. B. Cowan, w/o attachments  
J. B. Giessner  
S. A. Greenlee  
S. B. Haggerty  
D. W. Jenkins, w/o attachments  
M. W. Rencheck, w/o attachments  
E. M. Ridgell, w/o attachments  
J. F. Stang, Jr., NRC Washington, DC  
T. R. Stephens

## ATTACHMENT 1 TO C1001-06

### DESCRIPTION AND ASSESSMENT

#### 1.0 DESCRIPTION

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 (TS), of Facility Operating Licenses DPR-58 and DPR-74. I&M proposes to delete TS 6.8.3 requiring a program for post accident sampling, and thereby eliminate the requirements to have and maintain the Post Accident Sampling System (PASS) at CNP Units 1 and 2.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this TS improvement was announced in the Federal Register, Volume 65, Number 211, on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIP).

#### 2.0 ASSESSMENT

##### 2.1 Applicability of Published Safety Evaluation

I&M has reviewed the safety evaluation published on October 31, 2000, as part of the CLIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10, 2000, and May 22, 2000). I&M has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to CNP Units 1 and 2 and justify this amendment for the incorporation of the changes to the CNP TS.

##### 2.2 Optional Changes and Variations

I&M is not proposing any variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

Requirements for installing and maintaining PASS were included as Item 2.1.8.a in NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations," and were provided to I&M in a Show Cause Order dated January 2, 1980. Item 2.1.8.a of NUREG-0578 was clarified as Item II.B.3 in NUREG-0737, "Clarification of TMI Action Plan Requirements," provided to I&M on

October 31, 1980. Subsequently, on June 30, 1982, the NRC provided additional guidance for the PASS requirement, with a request for I&M to make a submittal which documents how each of the criterion presented in the NUREG-0737 guidance was satisfied. In a submittal from I&M to the NRC dated November 5, 1982, I&M described how it satisfied the NRC guidance for PASS. The NRC provided a draft safety evaluation of the CNP Units 1 and 2 PASS dated May 2, 1984, and identified several open issues needing resolution. In a submittal from I&M to the NRC dated August 2, 1984, I&M provided a resolution of the open issues noted in the NRC draft safety evaluation. Subsequently, the NRC issued a final safety evaluation on April 11, 1985, concluding that the CNP Units 1 and 2 PASS met the requirements of NUREG-0737, Item II.B.3.

The proposed license amendment request includes superseding the requirements of the NUREG-0578 Show Cause Order, NUREG-0737 Item II.B.3, and the requirements for PASS described in the draft and final safety evaluations provided by the NRC.

### 3.0 REGULATORY ANALYSIS

#### 3.1 No Significant Hazards Determination

I&M has reviewed the proposed no significant hazards consideration determination published on October 31, 2000, as part of the CLIIP. I&M has concluded that the proposed determination presented in the notice is applicable to CNP Units 1 and 2 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

#### 3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on October 31, 2000, for this TS improvement, plant-specific verifications or commitments, where applicable, are described as follows:

1. I&M will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in plant procedures and implemented with the implementation of the license amendment. Establishment of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold has been established for CNP Units 1 and 2 at radioactivity levels of 300  $\mu\text{Ci/cc}$  dose equivalent iodine. This capability will be described in plant procedures and implemented with the implementation of the license amendment. The capability for classifying fuel damage events is considered a regulatory commitment.

3. I&M has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in plant procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

#### 4.0 ENVIRONMENTAL EVALUATION

I&M has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000, as part of the CLIP. I&M has concluded that the staff's findings presented in that evaluation are applicable to CNP Units 1 and 2 and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT 2A TO C1001-06

TECHNICAL SPECIFICATION PAGE  
MARKED TO SHOW PROPOSED CHANGE

REVISED PAGE  
UNIT 1

6-6



## 6.0 ADMINISTRATIVE CONTROLS

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### 6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.
- b. Deleted.
- c. Deleted.
- d. PROCESS CONTROL PROGRAM implementation.
- e. OFFSITE DOSE CALCULATION MANUAL implementation.
- f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.
- g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits.
- h. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Quality Assurance Program Description, Appendix C, Section 6.5.

6.8.3 ~~Deleted~~ A plant program for post-accident sampling shall be established, implemented, and maintained which will ensure the capability to obtain and analyze reactor coolant samples, containment atmosphere noble gas samples, and unit vent gaseous effluent samples for iodines and particulates under accident conditions. The program will include the following:

- a. ~~Training of personnel,~~
- b. ~~Procedures for sampling and analysis,~~
- c. ~~Provisions for maintenance of sampling and analysis equipment.~~

ATTACHMENT 2B TO C1001-06

TECHNICAL SPECIFICATION PAGE  
MARKED TO SHOW PROPOSED CHANGE

REVISED PAGE  
UNIT 2

6-6

## 6.0 ADMINISTRATIVE CONTROLS

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### 6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.
- b. Deleted.
- c. Deleted.
- d. PROCESS CONTROL PROGRAM implementation.
- e. OFFSITE DOSE CALCULATION MANUAL implementation.
- f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.
- g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits.
- h. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Qualification Assurance Program Description, Appendix C, Section 6.5.

6.8.3 ~~Deleted~~ A plant program for post-accident sampling shall be established, implemented, and maintained which will ensure the capability to obtain and analyze reactor coolant samples, containment atmosphere noble gas samples, and unit vent gaseous effluent samples for iodines and particulates under accident conditions. The program will include the following:

- a. ~~Training of personnel;~~
- b. ~~Procedures for sampling and analysis;~~
- c. ~~Provisions for maintenance of sampling and analysis equipment.~~

ATTACHMENT 3A TO C1001-06

PROPOSED TECHNICAL SPECIFICATION PAGE

REVISED PAGE  
UNIT 1

6-6

## **6.0 ADMINISTRATIVE CONTROLS**

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### **6.8 PROCEDURES AND PROGRAMS**

- 6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:
- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.
  - b. Deleted.
  - c. Deleted.
  - d. PROCESS CONTROL PROGRAM implementation.
  - e. OFFSITE DOSE CALCULATION MANUAL implementation.
  - f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.
  - g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits.
  - h. Fire Protection Program implementation.
- 6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Quality Assurance Program Description, Appendix C, Section 6.5.
- 6.8.3 Deleted.

ATTACHMENT 3B TO C1001-06

PROPOSED TECHNICAL SPECIFICATION PAGE

REVISED PAGE  
UNIT 2

6-6

## **6.0 ADMINISTRATIVE CONTROLS**

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### **6.8 PROCEDURES AND PROGRAMS**

- 6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:
- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.
  - b. Deleted.
  - c. Deleted.
  - d. PROCESS CONTROL PROGRAM implementation.
  - e. OFFSITE DOSE CALCULATION MANUAL implementation.
  - f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.
  - g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits.
  - h. Fire Protection Program implementation.
- 6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Qualification Assurance Program Description, Appendix C, Section 6.5.
- 6.8.3 Deleted.

ATTACHMENT 4 TO C1001-06

COMMITMENTS

The following table identifies those actions committed to by Indiana Michigan Power Company (I&M) in this document. Any other actions discussed in this submittal represent intended or planned actions by I&M. They are described to the Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

Commitment	Date
I&M will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in plant procedures.	120 days from date of approval of license amendment request.
The capability for classifying fuel damage events at the Alert level threshold has been established for Donald C. Cook Nuclear Plant Units 1 and 2 at radioactivity levels of 300 $\mu\text{Ci/cc}$ dose equivalent iodine. This capability will be described in plant procedures.	120 days from date of approval of license amendment request.
I&M has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in plant procedures.	Complete