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 ALEXICH, M. P. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Requests that 851213 application for amend to License
 DPR-74, extending surveillance interval for Cycle 6, be
 processed as emergency Tech Spec change request.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

January 6, 1986
AEP:NRC:0967B

Donald C. Cook Nuclear Plant Unit No. 2
License No. 50-316
Docket No. DPR-74
AMENDMENT TO REQUEST FOR TECHNICAL SPECIFICATION CHANGE
SURVEILLANCE INTERVAL EXTENSION FOR UNIT 2 CYCLE 6

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

The purpose of this letter is to change our application (AEP:NRC:0967, dated December 13, 1985) for amendment to Technical Specifications (T/S). The change we are requesting is for our application to be processed as an emergency T/S change request.

Based on a discussion with your staff, we understand our T/S change request has not been noticed in the Federal Register as of this date. A normal T/S change request requires a 30-day notice period in the Federal Register. Accordingly, there is insufficient time to process a normal application in time for the necessary relief. Without the relief it would be necessary to shut the unit down beginning January 29, 1986 to perform the surveillances for which relief is being requested.

An early shutdown would result in: (1) a significant adverse delay on the start of our preplanned refueling outage, (2) a potentially extended unplanned outage needed to perform the cascading surveillances resulting from the deferred start of the refueling outage, and (3) a required restart in order to consume approximately 30 days of fuel remaining in the current fuel cycle. The unplanned outage would have an adverse financial impact on the utility and our rate payers.

We submitted our application (AEP:NRC:0967) on December 13, 1985, which would have allowed in excess of 45 days for normal processing of our T/S change application. NRC review resulted in a request for additional information concerning no significant hazard consideration. We expeditiously provided this supplemental information on December 19, 1985. We believe we have made a good faith effort to not take advantage of the provisions of 10 CFR 50.91(a)(5) in order to create a need for an emergency T/S change request.


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We regret that the processing of this application was adversely impacted by the recent holiday season. However, submission of the request was contingent upon granting of our environmental qualification relief, which did not allow an appreciably earlier submission of our T/S change application.

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

Very truly yours,


M. P. Alexich
Vice President 1/12/26

cm

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman

