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SUBJECT: Application for amends to licenses DPR-58 & DPR-74, removing audit of emergency & security plans & implementing procedures from list of responsibilities of Nuclear Safety & Design Review Committee (TS 6.5.2.8).

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AEP:NRC:0659X

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
TECHNICAL SPECIFICATIONS CHANGE REQUEST:
EMERGENCY AND SECURITY PLANS

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Attn: W. T. Russell

October 7, 1994

Dear Mr. Russell:

This letter and its attachments constitute an application for amendment to the technical specifications (T/Ss) for the Donald C. Cook Nuclear Plant Units 1 and 2. The proposed changes will remove the audit of the emergency and security plans and implementing procedures from the list of responsibilities of the Nuclear Safety and Design Review Committee (T/S 6.5.2.8). The proposed changes also include removal of requirements for Plant Nuclear Safety Review Committee (PNSRC) review of the emergency and security plans, their implementing procedures, and changes to the implementing procedures (T/Ss 6.5. and 6.8).

The requirements for PNSRC review of the security and emergency plans, their implementing procedures and changes to those procedures will be included in the respective emergency and security plans.

Changes are also proposed to T/S 6.5, relating to the composition of the PNSRC and the NSDRG, to reflect organizational changes.

Additionally, other proposed changes to T/S 6.5 will enable the Site Vice President/Plant Manager to delegate to his designee the responsibility for review and approval of proposed modifications to plant nuclear safety-related structures, systems, and components. Title corrections have also been made on all pages affected by the above changes.

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Attachment 1 contains a description of and justification for the proposed T/S changes (deletions). Attachment 2 contains the current T/S pages marked to show the proposed changes.. Attachment 3 contains the proposed revised T/S pages.

We believe that the proposed change will not result in (1) a significant change in the types of effluents or a significant increase in the amount of any effluents that may be released offsite, and (2) a significant increase in individual or cumulative occupational radiation exposure.

The proposed changes, with the exception of the organizational changes and one pertaining to Site Vice President/Plant Manager or designee approval, follow the guidance provided in Generic Letter 93-07. All of the proposed changes have been reviewed by the Plant Nuclear Safety Review Committee and by the Nuclear Safety and Design Review Committee.

In compliance with the requirements of 10 CFR 50.91(b)(1), copies of this letter and its attachments have been transmitted to J. R. Padgett of the Michigan Public Service Commission and to the Michigan Department of Public Health.

This letter is submitted pursuant to 10 CFR 50.30(b) and, as such, an oath statement is attached.

Sincerely,



E. E. Fitzpatrick
Vice President

blb

Attachments

cc: A. A. Blind
G. Charnoff
J. B. Martin - Region III
NFEM Section Chief
NRC Resident Inspector
J. R. Padgett

W. T. Russell

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AEP:NRC:0659X

bcc: S. J. Brewer/D. H. Malin/K. J. Toth
J. B. Hickman, NRC - Washington, D.C., w/att.
J. A. Kobyra
B. R. Signet
W. G. Smith, Jr.
J. S. Wiebe - Bridgman
DC-N-6015.1

STATE OF OHIO)
COUNTY OF FRANKLIN)

E. E. Fitzpatrick, being duly sworn, deposes and says that he is the Vice President of licensee Indiana Michigan Power Company, that he has read the foregoing Technical Specifications Change Request: Emergency and Security Plans and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

E E Fitzpatrick

Subscribed and sworn to before me this 7th
day of October, 19 94.

Rita D Hill

NOTARY PUBLIC
RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-30-99

ATTACHMENT 1 TO AEP:NRC:0659X

**TECHNICAL SPECIFICATIONS CHANGE REQUEST:
ADMINISTRATIVE CONTROL REQUIREMENTS**

ATTACHMENT 1 TO AEP:NRC:0659X

Justification for Changes

The proposed modifications to T/S 6.5.1.6.i, 6.5.1.6.j, 6.5.2.8.e, 6.5.2.8.f, 6.5.3.1.a, 6.5.3.1.f, 6.5.3.1.g, 6.8.1.b, and 6.8.1.c are in accordance with guidance provided in Generic Letter 93-07.

These requirements involve review and audits of the emergency and security plans and their implementing procedures. They will be relocated to the emergency and security plans as required by Generic Letter 93-07. As part of the emergency and security plans, any future changes to these requirements must be approved by the NRC, in accordance with 10 CFR 50.54, if the changes reduce the effectiveness of the Emergency and Security Plans.

The proposed changes to T/S 6.5.3.1.b, 6.5.3.1.c, and 6.5.3.1.e relate to technical review and approval of proposed modifications to plant nuclear safety-related structures, systems, and components. These proposed changes are consistent with "Standard Technical Specifications, Westinghouse Plants," NUREG-1431, 5.0 Administrative Controls, and "Quality Assurance Requirements for the Design of Nuclear Power Plants," ANSI N45.2.11-1974, concerning Interface Control (5.), Design Verification (6.) and Document Control (7.0).

Other proposed modifications to T/S 6.5 describe the changes in the composition of the PSNRC and the NSDRC, and also reflect organizational and title changes.

10 CFR 50.92 Criteria

We have evaluated the proposed T/S changes and have determined that the changes should involve no significant hazards consideration. The proposed amendment involves changes to the administrative controls section of the T/Ss only. Because all changes reflect organizational/title changes only or guidance from GL 93-07, they do not:

- 1) involve a significant increase in the probability or consequence 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.

A pending amendment (AEP:NRC:1093), submitted August 10, 1994, affects four pages in this submittal. Pages 6-12 and 6-13 (both Units) of that pending amendment are not to be superseded by this amendment.