

ATTACHMENT 1 TO AEP:NRG:0730K  
10 CFR 50.92 ANALYSIS FOR CHANGES TO  
THE DONALD C. COOK NUCLEAR PLANT  
UNITS 1 and 2  
TECHNICAL SPECIFICATIONS

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1.0 Section to be Changed

A. Unit 1

T/S page 3/4 0-2

B. Unit 2

T/S page 3/4 0-2

2.0 Extent of Change

The license amendment request proposes a change to T/S 4.0.5 for both Units. This change, which is consistent with the guidance given in the November 1993 draft of NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," will allow the implementation of relief requests submitted pursuant to the provisions of 10 CFR 50.55a(f)(5)(iii) while the relief requests are being reviewed by the NRC.

3.0 Specific Changes Requested

Delete the wording "except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i)."

4.0 Discussion

The present wording of the T/S is more restrictive than 10 CFR 50.55a. As reflected in the draft version of NUREG-1482, 10 CFR 50.55a "...does not require that relief requests must be granted before they are implemented. Rather, the regulations allow a licensee up to a full year after the beginning of the updated interval to inform the NRC of those new Code requirements which cannot be met and to request relief. The regulations require the licensee to submit relief requests within 12 months of the interval start date, or during the interval as it finds specific needs for relief."

The requested change to the T/Ss does not lessen our obligation to comply with the Code or to obtain relief from Code requirements.

### 5.0 No Significant Hazards Determination

We have evaluated the proposed T/S change and have determined that the change involves no significant hazards consideration. Operation of Cook Nuclear Plant in accordance with the proposed amendment will not:

- (1) Involve a significant increase in the probability or consequences of an accident.

The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The inspections required under Section XI are intended to show the operational readiness of the applicable components, and exceptions to the Code are allowed. When taking relief from Code requirements, alternate requirements are developed which provide a high level of confidence that components will perform their intended function.

The proposed change does not alter the Code requirements or lessen our obligations under existing regulations. Its only effect is to allow implementation of Code relief prior to obtaining NRC written approval. The proposed T/S change is consistent with NUREG-1431, and, as such, has been found to be acceptable by the NRC. Therefore, we believe that implementation of this change will not involve a significant increase in the probability or consequences of a previously analyzed incident.

- (2) Create the possibility of a new or different kind of accident from any previously analyzed.

The proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated. Typical relief requests involve using alternative testing methods or increasing the time interval between tests. Each proposed alternative must assure that the component will perform its intended function. The proposed change involves no physical changes to the plant; therefore, we believe that implementation of this change will not introduce a new or different kind of accident than previously analyzed.

(3) Involve a significant reduction in a margin of safety.

The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The inspections required under Section XI are intended to show the operational readiness of the applicable components, and exceptions to the Code are allowed. When taking relief from Code requirements, alternate requirements are developed which provide a high level of confidence that components will perform their intended function.

The proposed change does not alter the Code requirements or lessen our obligations under existing regulations. Its only effect is to allow implementation of Code relief prior to obtaining NRC written approval. The proposed T/S change is consistent with NUREG-1431, and, as such, has been found to be acceptable by the NRC. Therefore, we believe that implementation of this change will not result in a significant reduction of the margin of safety.

ATTACHMENT 2 TO AEP:NRG:0730K  
EXISTING TECHNICAL SPECIFICATIONS  
PAGES MARKED TO REFLECT PROPOSED CHANGES  
FOR DONALD C. COOK NUCLEAR PLANT  
UNIT 1 AND UNIT 2

### 3/4.0 APPLICABILITY

#### SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification. Surveillance requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), ~~except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).~~

### 3/4.0 APPLICABILITY

#### SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification. Surveillance requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g). ~~except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).~~

ATTACHMENT 3 TO AEP:NRC:0730K  
PROPOSED REVISED TECHNICAL SPECIFICATION PAGES  
FOR DONALD C. COOK NUCLEAR PLANT  
UNIT 1 AND UNIT 2



### 3/4.0 APPLICABILITY

#### SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension no to exceed 25% of the specified surveillance interval.

4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with operability requirements for a Limiting Condition for Operation and associated action statements unless otherwise required by the specification. Surveillance requirements do not have to be performed on inoperable equipment.

4.04 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a.

### 3/4.0 APPLICABILITY

#### SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.
- 4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension no to exceed 25% of the specified surveillance interval.
- 4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with operability requirements for a Limiting Condition for Operation and associated action statements unless otherwise required by the specification. Surveillance requirements do not have to be performed on inoperable equipment.
- 4.04 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.
- 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:
  - a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a.