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SUBJECT: Application for amends to licenses DPR-58 & DPR-74, modifying
 Table 4.8-1, DG Test Schedule by ref RG 1.9, Rev 3 rather than
 RG 1.108, Rev 1 criteria for determination of valid DG test.

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**INDIANA
MICHIGAN
POWER**

February 22, 1996

AEP:NRC:1243

Docket Nos.: 50-315
50-316

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

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
PROPOSED AMENDMENT TO TECHNICAL SPECIFICATION SECTIONS
3/4.8.1.1 FOR ELECTRICAL POWER SYSTEMS

This letter and its attachments constitute an application for amendment to the technical specifications (T/Ss) for Donald C. Cook Nuclear Plant units 1 and 2. Specifically, we are proposing to modify Table 4.8-1, Diesel Generator Test Schedule, by referencing Regulatory Guide 1.9, Revision 3 rather than Regulatory Guide 1.108, Revision 1 criteria for the determination of a valid diesel generator test.

Attachment 1 provides a detailed description of the proposed changes, the justification for the changes, and our determination of no significant hazards consideration performed pursuant to 10 CFR 50.92. Attachment 2 contains the existing T/S pages marked to reflect the proposed changes. Attachment 3 contains the proposed T/S pages.

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

These proposed changes have been reviewed by the Plant Nuclear Safety Review Committee and the Nuclear Safety and Design Review Committee.

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ADD 1

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

Sincerely,

for W. E. Smith
E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 22nd DAY OF February 1996

Lita W. Hise
Notary Public

My Commission Expires: 6-28-99

plt

Attachments

cc: A. A. Blind
G. Charnoff
H. J. Miller
NFEM Section Chief
NRC Resident Inspector - Bridgman
J. R. Padgett



ATTACHMENT 1 TO AEP:NRC:1243

DESCRIPTION AND JUSTIFICATION OF CHANGES

10 CFR 50.92 ANALYSIS FOR CHANGES

TO THE DONALD C. COOK NUCLEAR PLANT

UNITS 1 AND 2 TECHNICAL SPECIFICATIONS

I. DESCRIPTION OF CHANGES

The proposed amendment to Technical Specification (T/S) 3/4.8.1.1 makes the following specific change to the Cook Nuclear Plant units 1 and 2 T/S:

Revises a footnote in Table 4.8-1 to read as follows:

Criteria for determining number of failures and valid tests shall be in accordance with Regulatory Position C.2.1 of Regulatory Guide 1.9, Revision 3, where the number of tests and failures is determined on a per diesel generator basis. For the purposes of this test schedule, only valid tests conducted after the OL issuance date shall be included in the computation of the "last 20 valid tests."

II. JUSTIFICATION FOR CHANGES

The proposed revision to the T/S is based on the fact that Regulatory Guide 1.9, Revision 3 has incorporated the pertinent guidance previously addressed in Revision 1 of Regulatory Guide 1.108, and, being a more recent document, it better reflects the NRC requirements regarding diesel generator testing.

III. 10 CFR 50.92 CRITERIA

Per 10 CFR 50.92, proposed changes do not involve a significant hazards consideration if the changes do not:

1. involve a significant increase in the probability of consequences 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

Criterion 1

This amendment request does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed change to the T/S does not affect the assumptions, parameters, or results of any UFSAR accident analysis. The proposed amendment does not modify any existing equipment, and the proposed acceptance criteria for diesel generator testing will conform to NRC guidance. Based on these considerations, it is concluded that the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.



| Age Group | Gender | U.S. should take action (%) | U.S. should not take action (%) |
|-----------|--------|-----------------------------|---------------------------------|
| 18-29 | Male | 75 | 25 |
| | Female | 80 | 20 |
| 30-49 | Male | 80 | 20 |
| | Female | 85 | 15 |
| 50-69 | Male | 85 | 15 |
| | Female | 90 | 10 |
| 70+ | Male | 90 | 10 |
| | Female | 95 | 5 |

Criterion 2

The proposed changes do not involve physical changes to the plant or changes in plant operating configuration. The proposed changes update guidance for diesel generator testing. Thus, it is concluded that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Criterion 3

The proposed changes update guidance for the testing of diesel generators. The guidance is endorsed by the NRC in Regulatory Guide 1.9, and compliance with this guidance will ensure the operability of the diesel generators. Thus, there is no significant reduction in the margin of safety.