

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9602280006 DOC. DATE: 96/02/22 NOTARIZED: YES DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316
 AUTH. NAME AUTHOR AFFILIATION
 FITZPATRICK, E. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-58 & DPR-74, proposing
 to remove requirement that Operations Superintendent must
 hold or have held SOL at plant or similar reactor.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7 + 13
 TITLE: OR Submittal: General Distribution

NOTES:

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD3-1 LA	1 1	PD3-1 PD	1 1
HICKMAN, J	1 1		
INTERNAL: FILE CENTER 01	1 1	NRR/DE/EMCB	1 1
NRR/DRCH/HICB	1 1	NRR/DSSA/SPLB	1 1
NRR/DSSA/SRXB	1 1	NUDOCS-ABSTRACT	1 1
OGC/HDS2	1 0		
EXTERNAL: NOAC	1 1	NRC PDR	1 1

NOTE TO ALL "RIDS" RECIPIENTS:
 PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM OWFN 5D-5 (EXT. 415-2083) TO ELIMINATE YOUR NAME FROM
 DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 12 ENCL 11

C
A
T
E
G
O
R
Y

1

D
O
C
U
M
E
N
T

Indiana Michigan
Power Company
PO Box 16631
Columbus, OH 43216



February 22, 1996

AEP:NRC:0659AA

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
SECTION 6 ADMINISTRATIVE CONTROLS

This letter and its attachments constitute an application for amendment to the technical specifications (T/S) for Donald C. Cook Nuclear Plant units 1 and 2. Specifically, we are proposing to remove the requirement that the Operations Superintendent must hold or have held a Senior Operator License at Cook Nuclear Plant, or a similar reactor. In addition, a mid-level operations manager will only be required to hold a Senior Operator License if the Operations Superintendent does not hold one.

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.


270070

9602280006 960222
PDR ADOCK 05000315
P PDR

1001

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.

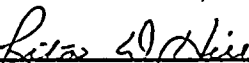
Sincerely,



for E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 22nd DAY OF February 1996


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:0659AA

DESCRIPTION AND JUSTIFICATION OF CHANGES
10 CFR 50.92 ANALYSIS FOR CHANGES
TO THE DONALD C. COOK NUCLEAR PLANT
UNIT 1 AND 2 TECHNICAL SPECIFICATIONS

I. SCOPE

The change to Section 6 of the Cook Nuclear Plant Technical Specifications, is administrative in nature and affects specifications 6.2.2.h, 6.3.1 and 6.5.1.2 as they are related to Operation Superintendent qualifications.

II. PURPOSE

The purpose of this change is to incorporate the guidance found in ANSI/ANS 3.1 - 1993 Section 4.2.2 which defines the special requirements for the position of Operations Manager.

III. DESCRIPTION OF CHANGES

The proposed amendment makes the following specific changes to the Cook Nuclear Plant Units 1 and 2 Technical Specifications:

The introduction to 6.2.2 has been moved from page 6-1 to 6-2.

6.2.2.h has been changed to read:

- h. The Operations Superintendent shall meet one of the following: (a) hold a Senior Operator License at Cook Nuclear Plant or similar reactor, or (b) have held a Senior Operator License at Cook Nuclear Plant or similar reactor, or (c) have been certified for equivalent senior operator knowledge, or (d) have plant operational knowledge consistent with the requirements of the Operations Superintendent job. If the Operations Superintendent does not hold a Senior Operator License, then an operations middle manager shall hold a Senior Operator License.

6.3.1 was changed to correspond to the changes made to 6.2.2.h.

In Technical Specifications 6.5.1.2 change the third paragraph to read:

PNSRC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 of ANSI N18.1-1971 except for the requirement to hold a Senior Operator License. The operations individual shall meet the requirements of section 6.2.2.h. The maintenance individual shall meet the qualifications of Section 4.2.3 of ANSI N18.1-1971.

IV. JUSTIFICATION FOR CHANGE

Item (d) of Section 4.2.2 of ANSI/ANS 3.1 - 1993 provides a relaxation from the requirement for the Operations Manager to obtain a Senior Operator License or certification. The ANSI/ANS standard provides for equivalent "plant operational knowledge of the Operations Manager's job," in place of obtaining a license or certification. In the event the Operations Manager does not hold an SRO, a mid-level operations manager is required to hold one per ANSI/ANS 3.1. The proposed amendment is consistent with this requirement.

This position is further supported in a letter dated January 26, 1984, from Steven A. Varga (NRR) to our Mr. John Dolan, containing the NRC's response to our request to change Technical Specification 6.3. The letter stated in part:

"We believe the Operations Superintendent's knowledge of plant operations should remain current but that this can be done through effective training and daily interactions. Since maintaining the SOL would require considerably more effort and might detract from the overall operations supervision, we also believe the Operations Superintendent need not maintain the SOL but he should have capable and licensed individuals reporting to him."

In light of the NRC's opinion, and in addition to the changes in qualification requirements as put forth in ANSI/ANS 3.1 which replaced ANSI N18.1, changing the Technical Specification will allow us to better manage the plant, and meet the intent of the updated ANSI/ANSI requirements.

V. 10 CFR 50.92 CRITERIA

Per 10 CFR 50.92, a proposed change does not involve a significant hazards consideration if the change does 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

The amendment request does not involve a significant increase in the probability or consequences of accident previously evaluated because the proposed change to the Technical

Specification does not affect the assumptions, parameters, or results of any UFSAR accident analysis. The proposed amendment does not modify any existing equipment. It is concluded that the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The proposed change does not involve physical changes to the plant or changes in plant operating configuration. The proposed change updates the requirements for the Operations Superintendent. 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 change updates the requirements for Operations Superintendent. There is no reduction in the margin of safety.

ATTACHMENT 2 TO AEP:NRC:0659AA

CURRENT TECHNICAL SPECIFICATION PAGES
WITH CHANGES MARKED