REGULATOR INFORMATION DISTRIBUTION STEM (RIDS)

ACCESSION NBR:8312200494 DOC.DATE: 83/12/15 NOTARIZED: NO DOCKET #
FACIL:50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
AUTH.NAME AUTHOR AFFILIATION
ALEXICH,M.P. Indiana & Michigan Electric Co.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application to amend Licenses DPR-58 & DPR-74,consisting of proposed administrative changes to Tech Specs.

DISTRIBUTION CODE: A001S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 11+24
TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL
	NRR ORB1 BC	01	7	7				
INTERNAL:	ELD/HDS3		1	0	NRR/DE/MTEB		1	1
	NRR/DL DIR		1	1	NRR/DL/ORAB		1	0
	NRR/DSI/METB		1	1	NRR/DSI/RAB		1	1
	REG FILE	04	1	1	RGN3		1	1
EXTERNAL:	ACRS	09	6	6	LPDR	03	2	2
	NRC PDR	02	1	1	NSIC	05	1	1
	NTIS		1	1				

TOTAL NUMBER OF COPIES REQUIRED: LTTR 26 ENCL 24

[illegible]

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

December 15, 1983
AEP:NRC:0790

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
TECHNICAL SPECIFICATIONS CHANGE REQUESTS

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

Dear Mr. Denton:

This letter and its Attachments request changes to the Technical Specifications and the Operating Licenses for the Donald C. Cook Nuclear Plant Units Nos. 1 and 2. These requests have been previously discussed with members of your staff, and are being made to either simplify or clarify the licenses.

Attachment Nos. 1 and 2 to this letter address the proposed changes to the licenses and the reasons for the changes for Unit Nos. 1 and 2, respectively. Attachment Nos. 3 and 4 to this letter contain the revised Technical Specification (T/S) pages. All of the changes are indicated by vertical bars drawn on the right hand margin of the page.

Because the proposed changes are purely administrative in nature, we believe that they do not involve significant hazards considerations, in that the operations of the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2, in accordance with the Amendments, would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in margin of safety.

There is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner. Furthermore, activities related to the amendments will be conducted in compliance with the NRC's regulations and will not be inimical to the common defense and security or to the health and safety of the public.

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

8312200494 831215
PDR ADOCK 05000315
P PDR

A001
1/1

In compliance with the requirements of 10 CFR 50.91(b)(1), a copy of this letter and its attachments have been transmitted to Mr. R. C. Callen of the Michigan Public Service Commission.

Since these change requests are administrative and editorial in nature, and with the purpose of simplifying or clarifying the license and Technical Specifications, and were made at the request of your staff, we interpret 10 CFR 170.22 as not requiring a fee to accompany this submittal.

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

MPA/cam

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

Attachment No. 1 to AEP:NRC:0790
Proposed License Changes
to Donald C. Cook Nuclear Plant Unit No. 1

1. The first proposed change to the License No. DPR-58 is to delete License Condition 2.C.(6), which states:

   (6) Spent Fuel Pool Modifications

   The licensee is authorized to modify the spent fuel pool as described in the application dated November 22, 1978 as supplemented by letters dated January 22, January 24, April 16, June 29, July 27, and September 11, September 26, and September 27, 1979. Since spent fuel is now being stored in the spent fuel pool, upon commencement of work on either the existing racks or the new racks in the spent fuel pool in conjunction with replacement of the existing racks with new racks:

   (a) the water in the spent fuel pool shall contain at least 2000 ppm boron and shall be maintained at this boron concentration until completion of the rack replacement; and

   (b) the boron in the spent fuel pool shall be verified to meet the concentration requirement by chemical analysis at least 3 times per 7 days, with a maximum time interval between samples of 72 hours.

   Prior to final conversion to the modified rack design, fuel may be stored, as needed, in either the modified storage racks described in Technical Specification 5.6.2 or in the unmodified storage racks (or both) which are designed and shall be maintained with a center-to-center distance between fuel assemblies placed in the storage racks to ensure a K_{eff} of ≤ 0.95 with the storage pool filled with unborated water, including a conservative allowance for uncertainties as described in Section 9.7 of the FSAR.

   Since all of the old racks have been replaced with new racks, and no further modifications are foreseen, we believe that this License Condition should be removed.

2. The second proposed change to the License No. DPR-58 is to delete the License Condition 2.E, which states:

   "2.E. Before engaging in an operational activity not evaluated by the Commission, the licensees will evaluate the environmental effects of such activity. When the evaluation indicates that such activity may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, the licensees shall provide a written evaluation of such activities and obtain prior approval of the Director, Office of Nuclear Reactor Regulation for the activities."

[illegible]

(3) [illegible]

(4) [illegible]

In License Amendment No. 54, issued on May 6, 1982, the Environmental Technical Specifications (Appendix B to the License) were revised to include all the environmental considerations contained in the then new Environmental Protection Plan (EPP). In Section 5.4.2 of this Amendment were the "Nonroutine Reports" requirements which included the following:

5.4.2.2 Changes

When a change to the Plant design, to the Plant operation, or to the procedures described in Section 5.3 is planned which involves an environmental matter or question not previously reviewed and evaluated by the NRC, a report on the change shall be made to the Office of Nuclear Reactor Regulation prior to implementation. The report shall include a description and evaluation of the change.

Changes or additions to permits and certificates required by Federal, state, local and regional authorities for the protection of the environment shall be reported. When the required changes are submitted to the concerned agency for approval, they shall also be submitted to the Director, Office of Nuclear Reactor Regulation, USNRC, for information. The submittal shall include an evaluation of the environmental impact of the change.

Request for changes in environmental technical specifications shall be submitted to the Director, Office of Nuclear Reactor Regulation, USNRC, for prior review and authorization. The request shall include an evaluation of the impact of the change, including a supporting benefit-cost analysis.

Since this Environmental Technical Specification addresses the same requirements as those contained in License Condition 2.E., we feel that the latter can now be deleted.

3. The third proposed change to the License No. DPR-58 is to delete the License Condition 2.F, which states:

"2.F. This amended license is subject to the following additional condition for the protection of the environment:

The licensees will comply with appropriate water quality standards in accordance with Federal, State, and local regulations (including changes as required by the Federal Water Pollution Control Act Amendments of 1972)."

As stated in item 2 above, Amendment No. 54 revised the Environmental Technical Specifications to include all the environmental considerations in the then new EPP. In Section 3.1 of this Amendment, were the "Radiological Environmental Monitoring" requirements for the monitoring of the lake and well water qualities in the Donald C. Cook Nuclear Plant area. For the above reasons, we feel that License Condition 2.F can be deleted.

4. The fourth proposed change to the License No. DPR-58 is to delete the footnote on page 3/4 5-3 which is no longer applicable. The footnote addresses a change in the Limiting Conditions for Operation for a given time period in October of 1982. Since the effective period of time for this change has expired, the footnote should be deleted.

5. The fifth proposed change to the License No. DPR-58 is to request the re-issuance of T/S page 3/4 6-35. A change was previously requested to the time delay addressed in paragraph 4.6.5.6.a. Amendment No. 63 of the T/S was issued on October 4, 1982 without the change. The Safety Evaluation Report for both units and the Technical Specification for Unit 2 were correct in changing the 10±1 minute delay in 4.6.5.6 to 9±1 minute. However, the Unit 1 Technical Specification was issued without the change. The basis for the change remains valid as presented in the Amendment 63 Safety Evaluation Report.

6. The sixth proposed change to the License No. DPR-58 is to remove the "Amendment No. 63" revision reference at the bottom of pages 3/4 3-50, 3/4 6-36, 3/4 9-9, B 3/4 2-3, and 6-10. Only the reverse sides of these pages were affected by Amendment 63. Therefore, the "Amendment 63" revision reference on each of these pages should be removed, and the correct "Amendment No." should be put in its place. Attachment No. 3 to this letter contains the revised T/S pages with the appropriate "Amendment No." on each page. Please note that several of these pages have no "Amendment No."; because they have never been revised.

Attachment No. 2 to AEP:NRC:0790
Proposed License Changes
to Donald C. Cook Nuclear Plant Unit No. 2

1. The first proposed change to the License No. DPR-74 is to delete the License Condition 2.C.3.(h), which states:

   2.C.(3).(H) Containment Sump Design Verification
   Indiana and Michigan Power Company shall complete tests to verify containment sump design before November 1978 and submit the results for Commission review and approval.

   In a letter from Mr. S. Varga of the NRC dated July 2, 1982, and by the Safety Evaluation Report that was transmitted with that letter, the NRC determined that we had adequately responded to the requirements of the License Condition and that the testing was acceptable. Deletion of this License Condition 2.C.3.(h) is consistent with that Safety Evaluation Report.

2. The second proposed change to the License No. DPR-74 is to delete the License Condition 2.C.(3)(l), which states:

   2.C.(3).(l) Residual Heat Removal System Low Flow Alarm
   Indiana and Michigan Power Company shall prior to startup, following the first regularly scheduled refueling outage, develop and submit for Commission review and approval the control logic for an alarm designed to alert the reactor operator to possible loss of flow in the residual heat removal system. Following initial startup and prior to installation of the alarm, Indiana and Michigan Power Company shall station an operator at a local panel to monitor cooldown flow when the residual heat removal system is in operation and the vessel head is in place.

   The Safety Evaluation Report (SER) for Amendment 10 to the license stated: "the license conditions have been met and the license condition 2.C.(3)(l) on Residual Heat Removal System Low Flow Alarm may be removed from the License." However, the license condition was not deleted from the license.

3. The third proposed change to the License No. DPR-74 is to delete License Condition 2.C.(3)(t), which states:

   2.C.(3)(t) Spent Fuel Pool Modifications
   The licensee is authorized to modify the spent fuel pool as described in the application dated November 22, 1978 as supplemented by letters dated January 22, January 24, April 16, June 29, July 27, and September 11, September 26, and September 27, 1979. Since spent fuel is now being stored in the spent fuel pool, upon commencement of work on either the existing racks or the new racks in the spent fuel pool in conjunction with replacement of the existing racks with new racks:

(i) the water in the spent fuel pool shall contain at least 2000 ppm boron and shall be maintained at this boron concentration until completion of the rack replacement; and

(ii) the boron in the spent fuel pool shall be verified to meet the concentration requirement by chemical analysis at least 3 times per 7 days, with a maximum time interval between samples of 72 hours.

Prior to final conversion to the modified rack design, fuel may be stored, as needed, in either the modified storage racks described in Technical Specification 5.6.2 or in the unmodified storage racks (or both) which are designed and shall be maintained with a center-to-center distance between fuel ass emblies placed in the storage racks to ensure a K_{eff} of $\leq .95$ with the storage pool filled with unborated water, including a conservative allowance for uncertainties as described in Section 9.7 of the FSAR.

Since all of the old racks have been replaced with new racks, and no further modifications are foreseen, we believe that this license condition should be removed.

4. The fourth proposed change to the License No. DPR-74 is to delete License Condition 2.E, which states:

2E. This license is subject to the following additional conditions for the protection of the environment:

(1) The licensees will comply with appropriate water quality standards, in accordance with Federal, State and local regulations (including changes as required by the Federal Water Pollution Control Act Amendments of 1972).

(2) If harmful effects or evidence of unacceptable damage are detected by the monitoring programs, the licensees shall provide to the Commission an analysis of the problem and a plan of action to be taken to eliminate or significantly reduce the detrimental effects or damage.

(3) Before engaging in an operational activity not evaluated by the Commission, the licensees will prepare and record an environmental evaluation of such activity. When the evaluation indicates that such activity may result in a significant adverse environmental impact that was not evaluated, or that is significantly greater than evaluated in the Final Environmental Statement, the licensees shall provide a written evaluation of such activities and obtain prior approval of the Director, Office of Nuclear Reactor Regulation for the activities.

(5)

(7)

(8)

With regard to Condition 2.E.(1), Amendment No. 40 to Unit No. 2 license revised the Environmental Technical Specifications to include all the environmental considerations in the new EPP. In Section 3.1 of this Amendment, were the "Radiological Environmental Monitoring" requirements for the monitoring of the lake and well water qualities in the Donald C. Cook Nuclear Plant area. For the above reasons, we feel that License Condition 2.E.(1) can be deleted.

With regard to Condition 2.E.(2), Section 5.4.1 (Environmental Technical Specification) of Amendment No. 40 to the Unit No. 2 License states: "If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem." Since this Environmental Technical Specification addresses the same requirements as those contained in License Condition 2.E.(2), we feel that the latter can be deleted.

With regard to Condition 2.E.(3), Section 5.4.2.2 (Environmental Technical Specification) of Amendment No. 40 to Unit No. 2 License states:

> 5.4.2.2 Changes
> When a change to the Plant design, to the Plant operation, or to the procedures described in Section 5.3 is planned which involves an environmental matter or question not previously reviewed and evaluated by the NRC, a report on the change shall be made to the Office of Nuclear Reactor Regulation prior to implementation. The report shall include a description and evaluation of the change.
> Changes or additions to permits and certificates required by Federal, state, local and regional authorities for the protection of the environment shall be reported. When the required changes are submitted to the concerned agency for approval, they shall also be submitted to the Director, Office of Nuclear Reactor Regulation, USNRC, for information. The submittal shall include an evaluation of the environmental impact of the change.
> Request for changes in Environmental Technical Specifications shall be submitted to the Director, Office of Nuclear Reactor Regulation, USNRC, for prior review and authorization. The request shall include an evaluation of the impact of the change, including a supporting benefit-cost analysis.

Since this Environmental Technical Specification addresses the same requirements as those contained in License Condition 2.E.(3), we feel that the latter can now be deleted.

5. The fifth proposed change to the License No. DPR-74 is to delete the footnote at the bottom of T/S page 3/4 6-39, which states:

> "For the lower inlet door inspection interval scheduled to end June 8, 1980, including the extension permitted by Specification 4.0.2, a one time only delay is allowed to extend this inspection interval through July 20, 1980."

Since the extension is no longer valid (i.e., past July 20, 1980), we request deletion of the footnote.

6. The sixth proposed change to the License No. DPR-74 is the deletion of the footnote at the bottom of page 3/4 9-9, which states:

> "During the refueling outage commencing about November 1982, the Containment Purge and Exhaust Isolation System shall be defined to include a radiation signal to either the inner or outer valve or a provision for immediate manual closure of the valve in the event closure may be required. This definition is temporary and it and this footnote shall no longer apply following the refueling outage commencing about November 1982. For the temporary relief period, the provisions of Specification 3.0.4 are not applicable."

Since the extension is no longer valid (i.e., the refueling outage commencing about November 1982 is over), we request deletion of the footnote.

7. The seventh proposed change to the License No. DPR-74 is the request to amend page B 3/4 6-3 by the deletion of Section 3/4 6.1.7 on the Containment Ventilation System. Amendment No. 47 issued on December 8, 1982 issued a new T/S page B 3/4 6-2a which included a Bases Section 3/4 6.1.7 on the Containment Purge and Exhaust Isolation Valves. This new section replaced the old Bases Section 3/4 6.1.7 contained on page B 3/4 6-3, however, the latter was not deleted. Based on this, we believe Bases Section 3/4 6.1.7 on page B 3/4 6-3 should be deleted.

8. The eighth proposed change to the License No. DPR-74 is to remove the "Amendment No. 45" revision reference at the bottom of pages: III; 3/4 1-1; 3/4 2-15; 3/4 3-4; 3/4 3-42; 3/4 4-2; 3/4 4-26; 3/4 5-5; 3/4 6-11; 3/4 6-43; 3/4 9-10; and B 3/4 2-3. Only the reverse sides of these pages were affected by Amendment 45. Therefore, the "Amendment 45" revision reference on each of these pages should be removed, and the correct "Amendment No." should be put in its place. Attachment No. 4 to this letter contains the revised T/S pages with the appropriate "Amendment No." on each page. Please note several of these pages have no "Amendment No."; because they have never been revised.

(10-80)

U.S. NUCLEAR REGULATORY COMMISSION

REACTOR FACILITY FEE DETERMINATION

1. FEE FORM TYPE (Check one)
- [X] PRELIMINARY
- [X] FINAL
- [ ] AMENDED

INSTRUCTIONS. Fill-in Items 1 through 14, as applicable, and send the original copy to the License Fee Management Branch.

2. DOCKET NUMBER(S): 50-315 & 316

3. ACCESSION NUMBER: 8312200494

4. LICENSEE: Indiana and Michigan Electric Company

5. PLANT NAME AND UNIT(S): D.C. COOK 1 & 2

6. DATE OF APPLICATION: 12/15/83

7. FEE REMITTED: YES [ ] NO [X]

8. LICENSEE FEE DETERMINATION

CLASS I	CLASS II	CLASS III	CLASS IV	CLASS V	CLASS VI	EXEMPT	NONE
						X	

9. SUBJECT: License and Technical Specification Update - Simplify and Clarify License

10. TAC NUMBER ASSIGNED (If available): 49542 & 3

11. APPROVAL: LETTER [ ] ORDER [ ]

DATE OF ISSUANCE: 4-27-84

AMENDMENT NUMBER(S): 80 & 63

12. NRC FEE DETERMINATION

[X] The above application has been reviewed in accordance with Section 170.22 of Part 170 and is properly categorized.

[ ] The above application has been reviewed in accordance with Section 170.22 of Part 170 and is incorrectly classified.

Fee should be class(es):

JUSTIFICATION FOR CLASSIFICATION OR RECLASSIFICATION:

[X] This application is a Class II type of action and is exempt from fees because it is:

- [ ] Filed by a nonprofit educational institution.
- [ ] Filed by a Government agency and is not for a power reactor.
- [X] For a Class I, II, or III amendment which results from an NRC request dated _____ for the application and the amendment is to simplify or clarify License or Technical Specifications; has only minor safety significance; and is being issued for the convenience of NRC (*must meet all of the criteria*).
- [ ] Other (*State reason therefor*)

See notes attached

1/25/84 To simplify & clarify TS for convenience of NRC.

13. SIGNATURE (*Branch Chief*): D.L. Wigginton — DATE: 1-6-84 cp 1/6/84

14. FINAL CERTIFICATION: The preliminary fee determination has been reassessed and is hereby affirmed.
SIGNATURE (*Project Manager or Branch Chief*): D.L. Wigginton — DATE: 2-6-84 cp 4/11/84

FOR LICENSE FEE MANAGEMENT BRANCH USE ONLY (*All others do not write below this line*)

The above exemption request has been reviewed and is hereby accepted as being exempt.
SIGNATURE (*Chief, LFMB*): W.D. Miller — DATE: 5/7/84

DISTRIBUTION BY LFMB

✓	Records Services Branch		DL Branch Chief		LFMB Exemption File		LFMB Reactor File