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 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316
 AUTH. NAME AUTHOR AFFILIATION
 FITZPATRICK, E. American Electric Power Co., Inc. *See Proposed Change to Tech Specs*
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amends to Licenses DPR-58 & DPR-74, removing
 TSS certain requirements for administrative controls, related
 to QA requirements, per Administrative Ltr 96-05.

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June 11, 1996

AEP:NRC:80027

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
LICENSE AMENDMENT REQUEST FOR THE
RELOCATION OF TECHNICAL SPECIFICATION
ADMINISTRATIVE CONTROLS RELATED
TO QUALITY ASSURANCE

This letter and its attachments constitute an application for a license amendment to the technical specifications (T/Ss) for the Donald C. Cook Nuclear Plant units 1 and 2. This proposed amendment would remove from the T/Ss certain requirements for administrative controls, related to quality assurance requirements, in accordance with the guidance of administrative letter (AL) 95-06. 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 revised 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.

In order to be effectively implemented, these proposed changes will require changes to the Quality Assurance Program Description (QAPD). Therefore, if this amendment request is approved, we request a 120 day implementation date from the date of issuance.

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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 the Michigan Department of Public Health.

In accordance with the guidance of AL 95-06 the subject administrative controls related to quality assurance requirements that are presently in the T/S will be relocated to the QAPD. Related changes to the QAPD will be accomplished in accordance with the requirements of 10 CFR 50.54(a).

Sincerely,


E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 10th DAY OF June 1996



Notary Public

My Commission Expires: 6-28-99

eh

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

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J. S. Wiebe
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DC-N-6015.1

ATTACHMENT 1 TO AEP:NRC:80027
DESCRIPTION OF PROPOSED CHANGES, THE JUSTIFICATION
FOR THE CHANGES, AND DETERMINATION OF NO SIGNIFICANT HAZARDS

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1.0 Sections to be Changed

Unit 1 and 2 T/S index;	pages XVI, and XVII
Unit 1 and 2	pages 6-4 through 6-13
Unit 1 and 2	page 6-19, 6-20, and 6-22

2.0 Extent of Changes

This license amendment request proposes removing the requirements for certain administrative controls related to quality assurance from the T/Ss for Cook Nuclear Plant units 1 and 2. This will be done following the guidance of AL 95-06. The index and the T/Ss were repaginated.

3.0 Specific Changes Requested

We propose to make the following unit 1 and unit 2 T/S changes:

- (a) delete on Index Pages XVI and XVII section 6.5 "Review and Audit"
- (b) delete on Index Page XVII section 6.10 "Record Retention"
- (c) delete T/S 6.5 "Review and Audit" from T/S page 6-4 through page 6-12.
- (d) delete T/S 6.6.1 b from T/S page 6-12
- (e) delete references to PNSRC and NSDRG from T/S 6.7.1 a, 6.7.1 b and 6.7.1 c from T/S page 6-12
- (f) delete T/S 6.8.2 from T/S page 6-13
- (g) delete T/S 6.10 "Record Retention" from T/S page 6-19 and 6-20
- (h) delete references to "Record Retention" from T/S 6.13.1 a, and 6.14.1 a from T/S page 6-22
- (i) delete references to PNSRC from T/S 6.13.1 b, and 6.14.1 b from T/S page 6-22

4.0 Discussion

AL 95-06 "Relocation of T/S Administrative Controls Related to Quality Assurance" was written to inform the licensees about recent experiences involving the relocation of T/S administrative controls related to quality assurance. Our license amendment request, using the guidance of AL 95-06, is voluntary. AL 95-06 does not transmit or imply any new or changed requirements or staff positions.

Following the guidance of AL 95-06 we propose to relocate certain T/S requirements that are administrative controls, related to quality assurance, to the QAPD.

In accordance with 10 CFR 50.54(a), changes that do not reduce the commitments will be submitted to the NRC in accordance with the requirements of 10 CFR 50.71.

In accordance with 10 CFR 50.54(a), changes to the QAPD that do reduce the commitments will be submitted to the NRC and receive NRC approval prior to implementation. In order to streamline our QAPD update process, by reducing the time to implement a separate, additional submittal, we envision that after NRC approval of this submittal, and during the 120 day implementation period of this submittal, we will submit a proposed change to the QAPD in accordance with 10 CFR 50.54(a).

Justification

These administrative controls do not satisfy the criteria of 10 CFR 50.36 for inclusion, in the T/Ss, as limiting conditions for operation. The relocated requirements will be controlled directly by regulations (Appendix B to 10 CFR Part 50 and 10 CFR 50.54(a) and a related licensee program (the QAPD). Our proposed change is consistent with the above and will follow the guidance of AL 95-06.

5.0 No Significant Hazards Determination

We have evaluated the proposed T/S changes and have determined that the changes should involve no significant hazards consideration based on the criteria established in 10 CFR 50.92(c). Operation of Cook Nuclear Plant in accordance with the proposed amendment will not satisfy any of the following criteria:

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

The proposed change does not involve any physical alteration of plant configurations, changes to setpoints, or operating parameters. This proposed amendment is to relocate the T/S requirements for administrative controls that are related to quality assurance to the QAPD. This is in accordance with the guidance provided in AL 95-06. Also, the relocated requirements and future changes are controlled by 10 CFR 50.54(a) which requires prior NRC approval for changes that reduce the commitments in the program description previously accepted by the NRC. Therefore, there will be no significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change does not involve any physical alteration of plant configurations, changes to setpoints, or operating parameters. This proposed amendment is to relocate the T/S requirements for administrative controls that are related to quality assurance to the QAPD. This is in accordance with the guidance provided in AL 95-06. Also, the relocated requirements and future changes are controlled by 10 CFR 50.54(a) which requires prior NRC approval for changes that reduce the commitments in the program description previously accepted by the NRC. Therefore, this proposed change does not create the possibility of a new or different kind of accident from any previously analyzed.

- (c) Involve a significant reduction in a margin of safety.

The proposed change does not involve any physical alteration of plant configurations, changes to setpoints, or operating parameters. This proposed amendment is to relocate the T/S requirements for administrative controls that are related to quality assurance to the QAPD. This is in accordance with the guidance provided in AL 95-06. Also, the relocated requirements and future changes are controlled by 10 CFR 50.54(a), which requires prior NRC approval for changes that reduce the commitments in the program description previously accepted by the NRC. Therefore, this proposed change does not involve a significant reduction in a margin of safety.

