

ATTACHMENT 2A TO C1099-07

TECHNICAL SPECIFICATIONS PAGES
MARKED TO SHOW PROPOSED CHANGES

REVISED PAGES
UNIT 1

3/4 6-13

B 3/4 6-3

9910190256 991012
PDR ADDCK 05000315
P PDR

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.6 CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months during shutdown, by verifying that each automatic valve in the flow path actuates to its correct position on a Containment Pressure -- High-High signal.
- d. At least once per 5 years by verifying a ~~the~~ water flow rate of ~~at least 20 gpm (greater than or equal to 20 gpm) but not to exceed 50 gpm (less than or equal to 50 gpm)~~ from the spray additive tank test line to each containment spray system with the spray pump operating on recirculation. ~~with a pump discharge pressure greater than or equal to 255 psig.~~

3/4 BASES
3/4.6 CONTAINMENT SYSTEMS

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analysis.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH minimum volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. These assumptions are consistent with the iodine removal efficiency assumed in the accident analysis.

Surveillance Requirement 4.6.2.2.d is performed by verifying a water flow rate ≥ 20 gpm and ≤ 50 gpm from the spray additive tank test line to each containment spray system with the spray pump operating on recirculation with a pump discharge pressure ≥ 255 psig.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analysis for a LOCA.

The opening of containment purge and exhaust valves and locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing a qualified individual, who is in constant communication with control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with: 1) zirconium-water reactions; 2) radiolytic decomposition of water; and 3) corrosion of metals within containment.

The acceptance criterion of 10,000 ohms is based on the test being performed with the heater element at an ambient temperature, but can be conservatively applied when the element is at a temperature above ambient.

ATTACHMENT 2B TO C1099-07

TECHNICAL SPECIFICATIONS PAGES
MARKED TO SHOW PROPOSED CHANGES

REVISED PAGES
UNIT 2

3/4 6-12

B 3/4 6-3

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.6 CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months during shutdown, by verifying that each automatic valve in the flow path actuates to its correct position on a Containment Pressure--High-High test signal. *
- d. At least once per 5 years by verifying a ~~the~~ water flow rate of at least 20 gpm (greater than or equal to 20 gpm) but not to exceed 50 gpm (less than or equal to 50 gpm) from the spray additive tank test line to each containment spray system with the spray pump operating on recirculation. ~~with a pump discharge pressure greater than or equal to 255 psig.~~

*The provisions of Technical Specification 4.0.8 are applicable.

3/4 BASES
3/4.6 CONTAINMENT SYSTEMS

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analysis.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration ensure a pH value of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. These assumptions are consistent with the iodine removal efficiency assumed in the accident analysis.

The contained water volume limit includes an allowance for water not usable because of tank discharge location or other physical characteristics.

Surveillance Requirement 4.6.2.2.d is performed by verifying a water flow rate ≥ 20 gpm and ≤ 50 gpm from the spray additive tank test line to each containment spray system with the spray pump operating on recirculation with a pump discharge pressure ≥ 255 psig.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analysis for a LOCA.

The opening of containment purge and exhaust valves and locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing a qualified individual, who is in constant communication with control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

ATTACHMENT 3A TO C1099-07

PROPOSED TECHNICAL SPECIFICATIONS PAGES

REVISED PAGES
UNIT 1

3/4 6-13

B 3/4 6-3

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.6 CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months during shutdown, by verifying that each automatic valve in the flow path actuates to its correct position on a Containment Pressure -- High-High signal.
- d. At least once per 5 years by verifying the flow rate from the spray additive tank test line to each containment spray system with the spray pump operating on recirculation.



3/4 BASES
3/4.6 CONTAINMENT SYSTEMS

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analysis.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH minimum volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. These assumptions are consistent with the iodine removal efficiency assumed in the accident analysis.

Surveillance Requirement 4.6.2.2.d is performed by verifying a water flow rate ≥ 20 gpm and ≤ 50 gpm from the spray additive tank test line to each containment spray system with the spray pump operating on recirculation with a pump discharge pressure ≥ 255 psig.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analysis for a LOCA.

The opening of containment purge and exhaust valves and locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing a qualified individual, who is in constant communication with control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with: 1) zirconium-water reactions; 2) radiolytic decomposition of water; and 3) corrosion of metals within containment.

The acceptance criterion of 10,000 ohms is based on the test being performed with the heater element at an ambient temperature, but can be conservatively applied when the element is at a temperature above ambient.

ATTACHMENT 3B TO C1099-07

PROPOSED TECHNICAL SPECIFICATIONS PAGES

REVISED PAGES
UNIT 2

3/4 6-12

B 3/4 6-3

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.6 CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months during shutdown, by verifying that each automatic valve in the flow path actuates to its correct position on a Containment Pressure--High-High test signal.*
- d. At least once per 5 years by verifying the flow rate from the spray additive tank test line to each containment spray system with the spray pump operating on recirculation.

*The provisions of Technical Specification 4.0.8 are applicable.

3/4 BASES
3/4.6 CONTAINMENT SYSTEMS

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analysis.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration ensure a pH value of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. These assumptions are consistent with the iodine removal efficiency assumed in the accident analysis.

The contained water volume limit includes an allowance for water not usable because of tank discharge location or other physical characteristics.

Surveillance Requirement 4.6.2.2.d is performed by verifying a water flow rate ≥ 20 gpm and ≤ 50 gpm from the spray additive tank test line to each containment spray system with the spray pump operating on recirculation with a pump discharge pressure ≥ 255 psig.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analysis for a LOCA.

The opening of containment purge and exhaust valves and locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing a qualified individual, who is in constant communication with control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

ATTACHMENT 4 TO C1099-07

NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

Indiana Michigan Power Company (I&M), the Licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, proposes to amend Appendix A, Technical Specifications (T/S), of Facility Operating Licenses DPR-58 and DPR-74. I&M proposes to revise T/S SR 4.6.2.2.d for the spray additive system to relocate the details associated with the acceptance criteria and test parameters to the associated T/S Bases. Additionally, certain administrative text format changes are also being proposed.

I&M has evaluated this proposed amendment and determined that it does not involve a significant hazard. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

1. involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;
2. create the possibility of a new or different kind of accident from any previously analyzed; or
3. involve a significant reduction in a margin of safety.

The determination that the criteria set forth in 10 CFR 50.92 are met for this amendment request is indicated below.

1. Does the change involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated?

The proposed changes relocate the details associated with the acceptance criteria and test parameters from the T/S SR to the associated Bases and do not affect system operability or performance. The format changes in the text on each page are administrative in nature and do not result in any change in plant operation. Relocation of this information to the Bases is administrative in nature and does not affect the probability or consequences of any accident previously evaluated. No actual change to the requirement is made. Actual plant operation is not affected by the administrative changes. No methods of operation of plant systems, structures or components are changed. Operation of accident mitigation features is not changed. Consequently, there is no affect upon the probability of any previously analyzed accident, transient, accident initiators, or precursor events. Additionally, because there is no actual change in plant design or operation, there is no affect upon radioactive material inventories, plant shielding, or effluent release points. Therefore, these changes do not significantly increase the probability of occurrence or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes relocate the details associated with the acceptance criteria and test parameters from the T/S SR to the associated Bases and do not affect system operability or performance. The format changes in the text on each page are administrative in nature and do not result in any change in plant operation. Facility operation and procedures are not changed. Relocation of this information to the Bases is administrative in nature and does not affect create any new accident scenarios, accident initiators, or precursor events. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

The proposed changes relocate the details associated with acceptance criteria and test parameters from the T/S SR to the associated Bases and do not modify T/S safety settings, setpoints, or other values. The format changes in the text on each page are administrative in nature and do not result in any change in plant operation. There is no effect upon operating margins and accident margins because the administrative changes do not change the manner of operation of plant systems, structures, or components. Plant emergency and abnormal operating procedures are not affected. There is no change of actual testing methodology, test parameters, or acceptance criteria. The response of the plant to an event is the same. Potential offsite doses are unaffected because operation of the facility is unchanged. Relocation of the testing details to the Bases is acceptable because controls are in place for T/S Bases changes which require evaluation of changes under the provisions of 10 CFR 50.59. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

In summary, based upon the above evaluation, I&M has concluded that the proposed amendment involves no significant hazards consideration.

ATTACHMENT 5 TO C1099-07

ENVIRONMENTAL ASSESSMENT

Indiana Michigan Power Company (I&M) has evaluated this license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. I&M has determined that this license amendment request meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50 that changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or that changes an inspection or a surveillance requirement, and the amendment meets the following specific criteria:

- (i) The amendment involves no significant hazards consideration.

As demonstrated in Attachment 4, the proposed changes do not involve a significant hazards consideration.

- (ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

Because there is no change in plant design or operation, there is no significant change in the types or significant increase in the amounts of any effluents released offsite.

- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The changes do not result in significant changes in the operation or configuration of the facility. There is no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor do the changes result in any change in the normal radiation levels within the plant. Therefore, there is no significant increase in individual or cumulative occupational radiation exposure resulting from these changes.

