



July 17, 2001

C0701-02
10 CFR 50.90

Docket Nos.: 50-315
50-316

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2
TECHNICAL SPECIFICATION CHANGE REQUEST
24-HOUR DELAY TO PERFORM A MISSED SURVEILLANCE

Pursuant to 10 CFR 50.90, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant 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 Surveillance Requirement 4.0.3 to provide a delay period following discovery of a missed surveillance prior to declaring that the Limiting Condition for Operation has not been met. The proposed delay period would be 24 hours from the time of discovery of the missed surveillance or the limit of the specified surveillance interval, whichever is less. The proposed changes are consistent with the intent of Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements." I&M is submitting this request to reduce the potential for unnecessary plant system and equipment manipulations.

I&M also proposes format changes that improve appearance and are not intended to introduce other changes.

Attachment 1 provides a detailed description and safety analysis to support the proposed changes. Attachments 2A and 2B provide marked-up T/S pages for Unit 1 and Unit 2, respectively. Attachments 3A and 3B provide the proposed T/S pages with the changes incorporated for Unit 1 and Unit 2, respectively. Attachment 4 describes the evaluation performed in accordance with 10 CFR 50.92(c), which concludes that no significant hazard is involved.

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Attachment 5 provides the environmental assessment. No new commitments are made in this submittal.

I&M requests Nuclear Regulatory Commission (NRC) review and approval in accordance with normal NRC review schedules for this type of request. I&M requests a 30-day implementation period.

No previous submittals affect T/S pages that are included in this request. If any future submittals affect these T/S pages, I&M will coordinate changes to the pages with the NRC Project Manager to ensure proper T/S page control when the associated license amendment requests are issued.

Should you have any questions, please contact Mr. Ronald W. Gaston, Manager of Regulatory Affairs, at (616) 697-5020.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. C. Bakken III', with a large, stylized flourish at the end.

A. C. Bakken III
Site Vice President

\dmb

Attachments

c: J. E. Dyer
MDEQ - DW & RPD
NRC Resident Inspector
R. Whale

AFFIRMATION

I, A. Christopher Bakken III, being duly sworn, state that I am Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

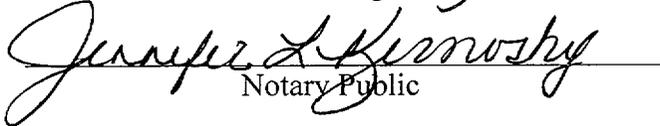
Indiana Michigan Power Company



A. C. Bakken III
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 17 DAY OF July, 2001


Notary Public

JENNIFER L. KERNOSKY
Notary Public, Berrien County, Michigan
My Commission Expires May 26, 2005

My Commission Expires 5/26/05

ATTACHMENT 1 TO C0701-02

DESCRIPTION AND SAFETY ANALYSIS FOR THE PROPOSED CHANGES

A. Summary of Proposed Changes

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 Surveillance Requirement (SR) 4.0.3 to provide a delay period following discovery of a missed surveillance prior to declaring that the Limiting Condition for Operation (LCO) has not been met. The proposed delay period would be 24 hours from the time of discovery of the missed surveillance or the limit of the specified surveillance interval, whichever is less. The proposed changes are consistent with the intent of Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements." I&M is submitting this request to reduce the potential for unnecessary plant system and equipment manipulations.

I&M also proposes format changes that improve appearance and are not intended to introduce other changes.

The proposed changes are described in detail in Section E of this attachment. T/S and associated bases pages that are marked to show the proposed changes are provided in Attachments 2A and 2B for Unit 1 and Unit 2, respectively. The proposed T/S and associated bases pages, with the changes incorporated, are provided in Attachments 3A and 3B for Unit 1 and Unit 2, respectively.

B. Description of the Current Requirements

T/S 4.0.3 requires performance of a SR within the specified time interval to comply with operability requirements for a LCO and associated action statements unless otherwise required by the specification.

C. Bases for the Current Requirements

The provisions of this specification set forth the criteria for determination of compliance with the operability requirements of the LCO. Under the criteria, equipment, systems or components are assumed to be operable if the associated surveillance activities have been satisfactorily performed within the specified time interval.

D. Need for Revision of the Requirements

To facilitate T/S compliance, surveillances are scheduled before their due dates. Upon discovery of a missed surveillance, a piece of equipment must be declared inoperable immediately and the

associated action statement must be entered. In GL 87-09 the Nuclear Regulatory Commission recognized the impracticality of the current T/S requirement, and the potential increase in risk to the plant and public safety that may be created.

As stated in GL 87-09, "If a plant shutdown is required before a missed surveillance is completed, it is likely that it would be conducted when the plant is being shut down because completion of a missed surveillance would terminate the shutdown requirement. This is undesirable since it increases the risk to the plant and public safety for two reasons. First, the plant would be in a transient state involving changing plant conditions that offer the potential for an upset that could lead to a demand for the system or component being tested.... Second, a shutdown would increase the pressure on the plant staff to expeditiously complete the required surveillance so that the plant could be returned to power operation."

E. Description of the Proposed Changes

I&M proposes to revise T/S 4.0.3 to allow a delay period of 24 hours from the time of discovery of the missed surveillance or up to the limit of the specified surveillance interval, whichever is less. If the surveillance is not performed within the delay period or when the surveillance is performed the surveillance criteria are not met, the LCO would be declared not met.

I&M proposes to revise the entire bases for T/S 4.0.3 to reflect the changes to the LCO.

I&M additionally proposes three types of format changes to the revised Unit 1 and Unit 2 T/S and associated bases pages. The types of changes to be applied are:

- (1) Reformat the header to include numbered first and second tier T/S or T/S bases section titles, and a full-width single line to separate the header section titles from the page text.
- (2) Reformat the footer to include "Page (page number)" center page, "AMENDMENT (past amendment numbers, with strikethrough, and ending with the current amendment number)" on the right side of the page, and a full-width single line to separate the footer from the page text.
- (3) Full justify the text where necessary and change the font.

F. Bases for the Proposed Changes

The proposed change to allow a delay period if a surveillance is inadvertently missed is acceptable because it is overly conservative to assume components are inoperable when a surveillance requirement has not been performed. Failure to comply with specified surveillance intervals for surveillance requirements is expected to be an infrequent occurrence. The proposed change is not intended to be used as an operational convenience to extend surveillance intervals. Some action statements have allowable outage time limits that do not allow sufficient time for completion of a missed surveillance. As stated in GL 87-09,

Because the allowable outage time limits of some action requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements may apply, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. After reviewing possible limits, the staff has concluded that, based on these considerations, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the Action Requirements are less than this time limit or when shutdown Action requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with Action Requirements before the surveillance can be completed.

This generic position applies to CNP. Based on information in GL 87-09, the use of up to a 24 hour delay period for conducting a missed surveillance is an appropriate balance between the risk of the affected equipment being inoperable and the risk of a transient associated with a forced shutdown.

This change is consistent with SR 4.0.3 in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." The NUREG-1431 wording was adjusted to reflect terminology differences between CNP T/S and NUREG-1431. These wording adjustments are: (1) the word "frequency" was replaced by "surveillance interval," (2) the word "condition(s)" was replaced with "action requirements," and (3) the word "entered" was replaced with "met" for consistency.

The bases was revised to be consistent with the NUREG-1431 bases. The NUREG-1431 bases wording was also adjusted to reflect terminology differences between CNP T/S and NUREG-1431.

NUREG-1431 was issued after GL 87-09. Thus, the NUREG-1431 wording was selected instead of the proposed T/S wording in GL 87-09. The NUREG-1431 wording is consistent with the intent of GL 87-09. Use of the NUREG-1431 wording has industry precedence. The proposed T/S and bases wording is similar to that approved for Shearon Harris Nuclear Power Plant Unit 1 in Amendment Number 56, to Facility Operating License Number NPF-63 on April 17, 1995.

The proposed changes to the format of the Unit 1 and Unit 2 T/S and T/S bases pages are administrative. They improve the appearance and do not introduce other changes.

ATTACHMENT 2A TO C0701-02

TECHNICAL SPECIFICATIONS AND BASES PAGES
MARKED TO SHOW PROPOSED CHANGES

REVISED PAGES
UNIT 1

3/4 0-2

B 3/4 0-4

B 3/4 0-4a

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.
- 4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.
- 4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification.

If it is discovered that a surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is less. This delay period is permitted to allow performance of the surveillance.

If the surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

When the surveillance is performed within the delay period and the surveillance criteria are not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

Surveillance requirements do not have to be performed on inoperable equipment.

- 4.04 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.
- 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:
- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a.

3/4 BASES
3/4.0 APPLICABILITY

- 4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements.
- 4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance, e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.
- 4.0.3 The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under this criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements.

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified surveillance interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is less, applies from the point in time that it is discovered that the surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified surveillance interval was not met.

This delay period provides adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with ACTION requirements or other remedial measures that might preclude completion of the surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements. When a surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified. Specification 4.0.3 allows the full delay period of 24 hours to perform the surveillance.

Specification 4.0.3 also provides a time limit for completion of surveillances that become applicable as a consequence of MODE changes imposed by ACTION requirements.

Failure to comply with specified surveillance intervals for surveillance requirements is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals.

4.0.3 (Continued)

If a surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the time limits of the ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon expiration of the delay period. If a surveillance is failed within the delay period, then the equipment is inoperable or the variable is outside the specified limits, and the time limits of the ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon the failure of the surveillance.

Completion of the surveillance within the delay period allowed by this Specification, or within the completion time of the ACTIONS, restores compliance with the Limiting Condition for Operation requirements.

- 4.0.4 This specification ensures that the surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an OPERATIONAL MODE or other applicable condition. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant startup or following extended plant outages, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.

ATTACHMENT 2B TO C0701-02

TECHNICAL SPECIFICATIONS AND BASES PAGES
MARKED TO SHOW PROPOSED CHANGES

REVISED PAGES
UNIT 2

3/4 0-2

B 3/4 0-3

B 3/4 0-3a

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.0 APPLICABILITY

SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.
- 4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.
- 4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification.

If it is discovered that a surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is less. This delay period is permitted to allow performance of the surveillance.

If the surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

When the surveillance is performed within the delay period and the surveillance criteria are not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

Surveillance requirements do not have to be performed on inoperable equipment.

- 4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.
- 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:
 - a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a.

3.0.5 (Continued)

consistent with the ACTION statement for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in the other division must be OPERABLE, or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source OPERABLE). In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements.

4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance, e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

4.0.3 The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under this criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements.

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified surveillance interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is less, applies from the point in time that it is discovered that the surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified surveillance interval was not met.

This delay period provides adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with ACTION requirements or other remedial measures that might preclude completion of the surveillance.

4.0.3 (Continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements. When a surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified. Specification 4.0.3 allows the full delay period of 24 hours to perform the surveillance.

Specification 4.0.3 also provides a time limit for completion of surveillances that become applicable as a consequence of MODE changes imposed by ACTION requirements.

Failure to comply with specified surveillance intervals for surveillance requirements is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals.

If a surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the time limits of the ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon expiration of the delay period. If a surveillance is failed within the delay period, then the equipment is inoperable or the variable is outside the specified limits, and the time limits of the ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon the failure of the surveillance.

Completion of the surveillance within the delay period allowed by this Specification, or within the completion time of the ACTIONS, restores compliance with the Limiting Condition for Operation requirements.

ATTACHMENT 3A TO C0701-02

PROPOSED TECHNICAL SPECIFICATIONS AND BASES PAGES

REVISED PAGES

UNIT 1

3/4 0-2

B 3/4 0-4

B 3/4 0-4a

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.
- 4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.
- 4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification.

If it is discovered that a surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is less. This delay period is permitted to allow performance of the surveillance.

If the surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

When the surveillance is performed within the delay period and the surveillance criteria are not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

Surveillance requirements do not have to be performed on inoperable equipment.

- 4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.
- 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:
 - a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a.

3/4 **BASES**
3/4.0 **APPLICABILITY**

- 4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements.
- 4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance, e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.
- 4.0.3 The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under this criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements.

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified surveillance interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is less, applies from the point in time that it is discovered that the surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified surveillance interval was not met.

This delay period provides adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with ACTION requirements or other remedial measures that might preclude completion of the surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements. When a surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified. Specification 4.0.3 allows the full delay period of 24 hours to perform the surveillance.

Specification 4.0.3 also provides a time limit for completion of surveillances that become applicable as a consequence of MODE changes imposed by ACTION requirements.

Failure to comply with specified surveillance intervals for surveillance requirements is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals.

3/4 **BASES**
3/4.0 **APPLICABILITY**

4.0.3 (Continued)

Completion of the surveillance within the delay period allowed by this Specification, or within the completion time of the ACTIONS, restores compliance with the Limiting Condition for Operation requirements.

4.0.4 This specification ensures that the surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an OPERATIONAL MODE or other applicable condition. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant startup or following extended plant outages, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.

ATTACHMENT 3B TO C0701-02

PROPOSED TECHNICAL SPECIFICATIONS AND BASES PAGES

REVISED PAGES

UNIT 2

3/4 0-2

B 3/4 0-3

B 3/4 0-3a

SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.
- 4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.
- 4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification.

If it is discovered that a surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is less. This delay period is permitted to allow performance of the surveillance.

If the surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

When the surveillance is performed within the delay period and the surveillance criteria are not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

Surveillance requirements do not have to be performed on inoperable equipment.

- 4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.
- 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:
 - a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a.

3.0.5 (Continued)

consistent with the ACTION statement for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in the other division must be OPERABLE, or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source OPERABLE). In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements.

4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance, e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

4.0.3 The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under this criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements.

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified surveillance interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is less, applies from the point in time that it is discovered that the surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified surveillance interval was not met.

This delay period provides adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with ACTION requirements or other remedial measures that might preclude completion of the surveillance.

4.0.3 (Continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements. When a surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified. Specification 4.0.3 allows the full delay period of 24 hours to perform the surveillance.

Specification 4.0.3 also provides a time limit for completion of surveillances that become applicable as a consequence of MODE changes imposed by ACTION requirements.

Failure to comply with specified surveillance intervals for surveillance requirements is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals.

If a surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the time limits of the ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon expiration of the delay period. If a surveillance is failed within the delay period, then the equipment is inoperable or the variable is outside the specified limits, and the time limits of the ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon the failure of the surveillance.

Completion of the surveillance within the delay period allowed by this Specification, or within the completion time of the ACTIONS, restores compliance with the Limiting Condition for Operation requirements.

ATTACHMENT 4 TO C0701-02

NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

Indiana Michigan Power Company (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 does not involve a significant hazard 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 evaluated; or
3. involve a significant reduction in a margin of safety.

The proposed change revises technical specification (T/S) Surveillance Requirement 4.0.3 to provide a delay period following discovery of a missed surveillance prior to declaring that the Limiting Condition for Operation has not been met. The proposed delay period would be 24 hours from the time of discovery of the missed surveillance or the limit of the specified surveillance interval, whichever is less. The proposed changes are consistent with the intent of Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements." I&M is submitting this request to reduce the potential for unnecessary plant system and equipment manipulations.

The proposed change includes format changes that improve appearance and are not intended to introduce other changes.

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?

It is overly conservative to assume components are inoperable when a surveillance requirement has not been performed. The 24-hour delay period to perform a missed surveillance does not involve a significant increase in the probability of occurrence of an accident previously evaluated because it allows time to perform the surveillance without requiring other plant manipulations such as a plant shutdown. If a plant shutdown is required before a missed surveillance is completed, it is likely that the surveillance would be conducted when the plant is being shut down because completion of a missed surveillance would terminate the shutdown requirement. A forced plant shutdown or other forced actions prior to completion of the missed surveillance increases risk to the plant, as it requires the manipulation of additional equipment. Delaying a

surveillance test on a component cannot cause a failure of the component, nor would it significantly affect accident initiators or precursors. Therefore, there is no significant increase in the probability of occurrence of an accident previously evaluated.

Since this change does not affect plant design, operation, or the manner in which testing is performed, there is no effect on the consequences of an accident previously evaluated.

The T/S page format changes are administrative in nature and have no impact on plant operation.

Thus, the proposed change does not involve a significant increase in 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 change does not affect plant design, operation, or the manner in which testing is performed. Delaying a surveillance test on a component cannot cause a failure of the component. As such, the proposed delay period will not cause any equipment malfunctions or introduce any changes to the way in which components operate. The T/S page format changes are administrative in nature and have no impact on plant operation. Therefore, the proposed changes do not increase 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 margin of safety is neither described or prescribed for this specification. The proposed change simply provides additional time to perform a surveillance and verify that the operability of equipment is in conformance with the T/S requirements.

The T/S page format changes are administrative in nature and have no impact on plant operation.

Therefore, the proposed change does 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 C0701-02

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, this proposed amendment does not involve 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.

This proposed changes do not impact the operation of any potentially radioactive system, and do not create any potential for increasing the release of any contained radioactive fluids from any system. The proposed changes will not result in the generation of any additional effluents. Therefore, there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

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

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