INDIANA
MICHIGAN
POWER

August 7, 2001

C0801-04
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
APPLICABILITY OF LIMITING CONDITION FOR OPERATION

Pursuant to 10 CFR 50.90, 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 (TS), of Facility Operating Licenses DPR-58 and DPR-74. I&M proposes to create TS 3.0.6 and associated bases to allow equipment that was removed from service or declared inoperable to be to returned to service under administrative controls solely to perform the testing required to demonstrate its operability or the operability of other equipment. TS 3.0.6 would incorporate the administrative controls currently approved for use as TS 3.0.5 in NUREG-1431, "Standard Technical Specifications Westinghouse Plants," Revision 2, dated April 30, 2001.

I&M proposes to modify TS 3.0.1 and 3.0.2 for consistency with the proposed TS 3.0.6. I&M also proposes format changes to the affected TS pages that improve appearance but 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 TS pages for Unit 1 and Unit 2, respectively. Attachments 3A and 3B provide the proposed TS 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. Attachment 5 provides the environmental assessment. No new commitments are being made in this submittal.

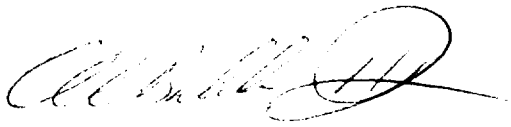
A001

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

One previous submittal affects the Unit 2 TS Bases pages that are included in this request. In submittal C0701-02, dated July 17, 2001, I&M requested a change to allow a 24-hour delay to perform a missed surveillance. I&M will coordinate changes to these pages, or any affected by future submittals, with the NRC Project Manager to ensure proper TS page control when the associated license amendment requests are approved.

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

Sincerely,



A. C. Bakken III
Site Vice President

\bjb

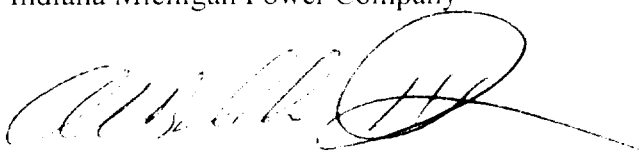
Attachments

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 7 DAY OF August, 2001

Jennifer L Kernosky
Notary Public

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

My Commission Expires 5/26/2005

ATTACHMENT 1 TO C0801-04

DESCRIPTION AND SAFETY ANALYSIS FOR THE PROPOSED CHANGES

A. Summary of the 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 (TS), of Facility Operating Licenses DPR-58 and DPR-74. I&M proposes to create TS 3.0.6 and associated bases to allow equipment that was removed from service or declared inoperable to be to returned to service under administrative controls solely to perform the testing required to demonstrate its operability or the operability of other equipment. TS 3.0.6 would incorporate the administrative controls currently approved for use as TS 3.0.5 in NUREG-1431, "Standard Technical Specifications Westinghouse Plants," Revision 2, dated April 30, 2001.

I&M proposes to modify TS 3.0.1 and 3.0.2 for consistency with the proposed TS 3.0.6. I&M also proposes format changes to the affected TS pages that improve appearance but are not intended to introduce other changes.

The proposed changes are described in detail in Section D of this attachment. TS 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 TS pages, with the changes incorporated, are provided in Attachments 3A and 3B for Unit 1 and Unit 2, respectively.

B. Description and Bases of the Current Requirements

TS 3.0.1 and 3.0.2 provide general requirements that are applicable to each limiting condition for operation (LCO) and surveillance requirement.

TS 3.0.1 requires the LCO and action requirements to be applicable during the operational modes or other conditions specified for each specification.

TS 3.0.2 specifies that adherence to the requirements of the LCO and/or associated action within the specified time interval shall constitute compliance with the specification. TS 3.0.2 also allows that, in the event the LCO is restored prior to expiration of the specified time interval, completion of the action statement is not required.

C. Need for Revision of the Requirement

There are situations when equipment that was declared inoperable must be returned to service to perform post-maintenance testing to demonstrate its operability or the operability of other equipment. This is not allowed by the current requirements. As a result, a plant shutdown may be necessary if the required testing cannot be completed in the current mode of plant operation.

D. Description of the Proposed Changes

I&M proposes to create TS 3.0.6 to allow an exception to TS 3.0.1 and 3.0.2 so equipment that was removed from service or declared inoperable to comply with TS action requirements may be returned to service under administrative control solely to perform testing required to demonstrate its operability or the operability of other equipment.

I&M proposes to modify TS 3.0.1 and 3.0.2 for consistency with the new provisions in TS 3.0.6. I&M also proposes to revise the Bases to reflect the proposed changes to the TS.

In addition, I&M proposes three types of format changes to the revised pages. The types of changes to be applied are:

(1) Reformat the header to include numbered first and second tier TS 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) Fully justify the text and change the font.

E. Bases for the Proposed Changes

The proposed TS 3.0.6 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with a TS required action. The sole purpose of this specification is to provide an exception to TS 3.0.1 and 3.0.2 (i.e., to not comply with the applicable required action(s)) to allow the performance of required testing to demonstrate either:

a. The operability of the equipment being returned to service; or

b. The operability of other equipment.

Administrative controls, such as test procedures, ensure the time the equipment is returned to service is limited to the time absolutely necessary to perform the required testing to demonstrate operability. This TS does not provide time to perform any other preventive or corrective maintenance.

The potential impact of temporarily returning the equipment to service is considered to be insignificant since the equipment will either be expected to be able to perform its required safety function or sufficient redundancy will exist such that the required function would still occur. This is addressed in 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." GL 87-09 states, "It is overly conservative to assume that systems or components are inoperable when a surveillance has not been performed because the vast majority of surveillances do in fact demonstrate that systems or components are operable."

An example of demonstrating the operability of the equipment being returned to service is reopening a containment isolation valve that was closed to comply with TS action requirements. The valve must be reopened to perform the testing required to demonstrate operability. Since the required testing would be performed after completing corrective actions, the valve would be expected to be demonstrated operable. Therefore, it is not likely that returning the valve to service would adversely impact safe operation of the plant.

An example of demonstrating the operability of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel or trip system. A similar example is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system. The proposed TS would prevent the need for plant shutdowns, and the associated transient conditions that may challenge safety-related systems, to complete the required testing.

Licensing Precedents

The proposed changes are consistent with NUREG-1431. The proposed exceptions to CNP TS 3.0.1 and 3.0.2 are equivalent to the exception allowed in TS 3.0.2 of NUREG-1431. Additionally, changes similar to those proposed for CNP were approved for Seabrook Station on June 16, 1998, in Amendment No. 57 to Facility Operating License No. NPF-86, and Millstone Nuclear Power Station Unit 3 on April 17, 2000, in Amendment No. 179 to Facility Operating License No. NPF-49.

ATTACHMENT 2A TO C0801-04

TECHNICAL SPECIFICATIONS PAGES
MARKED TO SHOW PROPOSED CHANGES

REVISED PAGES
UNIT 1

3/4 0-1

B 3/4 0-3

LIMITING CONDITION FOR OPERATION

3.0.1 Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each specification, **except as provided in Specification 3.0.6**.

3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification, **except as provided in Specification 3.0.6**. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

3.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements.

3.0.5 When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, within 2 hours action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation does not apply by placing it as applicable in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

This Specification is not applicable in MODES 5 or 6.

3.0.6 Equipment removed from service or declared inoperable to comply with ACTION requirements may be returned to service under administrative controls solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Specifications 3.0.1 and 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

3.0.5 (Continued)

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.

3.0.6 This specification establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTION requirements. The sole purpose of this specification is to provide an exception to Specifications 3.0.1 and 3.0.2 (e.g., to not comply with the applicable ACTION requirements) to allow the performance of required testing to demonstrate:

a. The OPERABILITY of the equipment being returned to service; or

b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTION is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with ACTION requirements and must be reopened to perform the required testing.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

ATTACHMENT 2B TO C0801-04

TECHNICAL SPECIFICATIONS PAGES
MARKED TO SHOW PROPOSED CHANGES

REVISED PAGES
UNIT 2

3/4 0-1

B 3/4 0-3
B 3/4 0-4

LIMITING CONDITION FOR OPERATION

3.0.1 Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each specification, **except as provided in Specification 3.0.6.**

3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification, **except as provided in Specification 3.0.6.** In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

3.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements.

3.0.5 When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, within 2 hours action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation does not apply by placing it as applicable in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

This Specification is not applicable in MODES 5 or 6.

3.0.6 Equipment removed from service or declared inoperable to comply with ACTION requirements may be returned to service under administrative controls solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Specifications 3.0.1 and 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

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.

3.0.6 This specification establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTION requirements. The sole purpose of this specification is to provide an exception to the Specifications 3.0.1 and 3.0.2 (e.g., to not comply with the applicable ACTION requirements) to allow the performance of required testing to demonstrate:

a. The OPERABILITY of the equipment being returned to service; or

b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTION is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with ACTION requirements and must be reopened to perform the required testing.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

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.

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.

4.0.5 This specification ensures that 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 will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these technical specifications.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout these technical specifications and to remove any ambiguities relative to the frequencies for performing and the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. For example, the requirements of Specification 4.0.4 to perform surveillance activities prior to entry into an OPERATIONAL MODE or other specified applicability condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps to be tested up to one week after return to normal operation. And, for example, the Technical Specification definition of OPERABLE does not grant a grace period before a device that is not capable of performing its specified function is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

ATTACHMENT 3A TO C0801-04

PROPOSED TECHNICAL SPECIFICATIONS PAGES

REVISED PAGES
UNIT 1

3/4 0-1

B 3/4 0-3

LIMITING CONDITION FOR OPERATION

3.0.1 Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each specification, except as provided in Specification 3.0.6.

3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification, except as provided in Specification 3.0.6. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

3.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements.

3.0.5 When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, within 2 hours action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation does not apply by placing it as applicable in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

This Specification is not applicable in MODES 5 or 6.

3.0.6 Equipment removed from service or declared inoperable to comply with ACTION requirements may be returned to service under administrative controls solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Specifications 3.0.1 and 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

3.0.5 (Continued)

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.

3.0.6 This specification establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTION requirements. The sole purpose of this specification is to provide an exception to Specifications 3.0.1 and 3.0.2 (e.g., to not comply with the applicable ACTION requirements) to allow the performance of required testing to demonstrate:

a. The OPERABILITY of the equipment being returned to service; or

b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTION is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with ACTION requirements and must be reopened to perform the required testing.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

ATTACHMENT 3B TO C0801-04

PROPOSED TECHNICAL SPECIFICATIONS PAGES

REVISED PAGES
UNIT 2

3/4 0-1

B 3/4 0-3
B 3/4 0-4

LIMITING CONDITION FOR OPERATION

3.0.1 Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each specification, except as provided in Specification 3.0.6.

3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification, except as provided in Specification 3.0.6. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

3.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements.

3.0.5 When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, within 2 hours action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation does not apply by placing it as applicable in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

This Specification is not applicable in MODES 5 or 6.

3.0.6 Equipment removed from service or declared inoperable to comply with ACTION requirements may be returned to service under administrative controls solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Specifications 3.0.1 and 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

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.

3.0.6 This specification establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTION requirements. The sole purpose of this Specification is to provide an exception to the Specifications 3.0.1 and 3.0.2 (e.g., to not comply with the applicable ACTION requirements) to allow the performance of required testing to demonstrate:

a. The OPERABILITY of the equipment being returned to service; or

b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTION is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with ACTION requirements and must be reopened to perform the required testing.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

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.

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.

4.0.5 This specification ensures that 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 will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these technical specifications.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout these technical specifications and to remove any ambiguities relative to the frequencies for performing and the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. For example, the requirements of Specification 4.0.4 to perform surveillance activities prior to entry into an OPERATIONAL MODE or other specified applicability condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps to be tested up to one week after return to normal operation. And, for example, the Technical Specification definition of OPERABLE does not grant a grace period before a device that is not capable of performing its specified function is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

ATTACHMENT 4 TO C0801-04

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 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.

I&M proposes to create TS 3.0.6 and associated bases to allow equipment that was removed from service or declared inoperable to be to returned to service under administrative controls solely to perform the testing required to demonstrate its operability or the operability of other equipment. TS 3.0.6 would incorporate the administrative controls currently approved for use as TS 3.0.5 in NUREG-1431, "Standard Technical Specifications Westinghouse Plants," Revision 2, dated April 30, 2001.

I&M proposes to modify TS 3.0.1 and 3.0.2 for consistency with the proposed TS 3.0.6. I&M also proposes format changes to the affected TS pages that improve appearance but 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?

Probability of Occurrence of an Accident Previously Evaluated

The potential impact of temporarily returning the equipment to service is considered to be insignificant since the equipment will either be expected to be able to perform its required safety function or sufficient redundancy will exist such that the function would still occur if required. This is addressed in 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." GL 87-09 states, "It is overly conservative to assume that systems or components are inoperable when a surveillance has not been performed because the vast majority of surveillances do in fact demonstrate that systems or components are operable." In addition,

returning the equipment to service for testing will promote timely restoration of the equipment. Therefore, the proposed changes do not significantly affect accident initiators or precursors.

The proposed change to create a Bases statement for TS 3.0.6 provides explanatory information regarding the intent of the specification and how it is to be implemented. The proposed Bases change does not alter requirements of the associated TS. Therefore, the effect of the Bases change on accident initiators and precursors of an accident is bounded by the effect of the TS change as described above. The format changes are intended to improve appearance and do not alter any requirements.

Therefore, the proposed changes do not adversely affect any accident initiators or precursors and will not involve a significant increase in the probability of an accident previously evaluated.

Consequences of an Accident Previously Evaluated

The proposed change will allow temporarily returning equipment, that was previously declared inoperable, to service in a state in which it is expected to function to mitigate the consequences of a previously analyzed accident. The proposed change will also permit temporarily restoring inoperable equipment to service in situations where sufficient redundancy would exist for its function to mitigate the consequences of a previously analyzed accident to be performed. This will promote timely restoration of equipment and capabilities to mitigate the consequences of an accident previously analyzed.

The proposed change to include a Bases statement for TS 3.0.6 provides explanatory information regarding the intent of the specification and how it is to be implemented. The proposed Bases change does not alter requirements of the associated TS. Therefore, the effect of the Bases change on offsite dose consequences of an accident previously analyzed is bounded by the effect of the TS change as described above. The format changes are intended to improve appearance and do not alter any requirements.

Therefore, the probability of occurrence or the consequences of accidents previously evaluated are not significantly increased.

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

The proposed changes do not introduce a new mode of plant operation and do not involve a physical modification to the plant. Operation with the inoperable equipment temporarily restored to service under administrative controls is not considered a new mode of operation since the equipment is not being physically altered. As such, the manner in which it can fail remains the same.

The proposed change to include a Bases statement for TS 3.0.6 provides explanatory information regarding the intent of the specification and how it is to be implemented. The proposed Bases change does not alter requirements of the associated TS. Therefore, the effect of the Bases changes on accident initiators or precursors is bounded by the effect of the associated TS as described above. The format changes are intended to improve appearance and do not alter any requirements.

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 new TS 3.0.6 can be applied to any structures, systems, and components that are governed by the TS. As such, the proposed changes are applicable to every margin of safety imposed by the TS.

The proposed change will allow temporarily returning equipment that was previously declared inoperable to service in a state in which it is expected to function to mitigate the consequences of a previously analyzed accident. The proposed change will also permit temporarily restoring inoperable equipment to service in situations where sufficient redundancy would exist for its function to mitigate the consequences of a previously analyzed accident to be performed. The performance of the testing should confirm the expected capability of the equipment and there is no significant impact on any TS safety setting or setpoint.

There is no margin of safety pertinent to the proposed Bases change. The format changes are intended to improve appearance and do not alter any requirements.

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 C0801-04

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.

The proposed changes will not significantly affect any systems or components involved in the release of effluents or the requirements governing their operation. Therefore, there will be no significant change in the types or significant increase in the amounts of any effluents released offsite.

As documented in Attachment 1, there will be no significant change in plant operation. Thus, there will be 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 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 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.