



November 1, 2001

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10 CFR 50.4

Docket Nos: 50-315  
50-316

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington DC 20555-001

Donald C. Cook Nuclear Plant Units 1 and 2  
SCHEDULE AND SCOPE OF CONVERSION TO NUREG-1431,  
“STANDARD TECHNICAL SPECIFICATIONS – WESTINGHOUSE  
PLANTS”

Indiana Michigan Power Company (I&M) is the licensee for Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2, holder of facility operating licenses DRP-58 and DPR-74, respectively. By correspondence C0801-15, dated August 24, 2001, I&M notified the Nuclear Regulatory Commission (NRC) of the intent to convert the Technical Specifications (TS) contained in Attachment A to DPR-58 and DPR-74 to the format and content (when appropriate) of NUREG-1431, “Standard Technical Specifications – Westinghouse Plants.” In that letter, I&M committed to provide, by November 1, 2001, a schedule and a description of the scope of the conversion to the Improved Standard Technical Specifications (ISTS), including a listing of plant issues currently within the scope of NRC Administrative Letter 98-10, “Dispositioning of Technical Specifications that are Insufficient to Assure Plant Safety,” that will be resolved in the conversion. This letter satisfies that commitment.

The license amendment request proposing conversion of the CNP TSs to the NUREG 1431, Revision 2, ISTSs is currently scheduled to be submitted by the end of the First Quarter, 2004. The issues currently within the scope of NRC

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Administrative Letter 98-10 that will be addressed in the proposed conversion are presented in Attachment 1. The commitment made in this letter is presented in Attachment 2.

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

Sincerely,



M. W. Rencheck  
Vice President Nuclear Engineering

/dmb

Attachments

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

ATTACHMENT 1 TO C1101-07

Administrative Letter 98-10 Items

The following items apply to both Unit 1 and Unit 2 unless stated otherwise.

**1. Diesel Generator Voltage and Frequency Limits**

Indiana Michigan Power Company (I&M) has implemented administrative controls for diesel generator voltage and frequency limits that are more restrictive than those specified in Technical Specification (TS) 4.8.1.1.2.e. The more restrictive limits ensure that engineered safety features pumps will produce flow that is adequate to meet their assumed safety and accident mitigation functions.

**2. Condensate Storage Tank (CST) Volume**

I&M has implemented administrative controls for CST levels that are more restrictive than those specified in TS 3.7.1.3. The more restrictive limits ensure that sufficient water is available to meet the requirements described in the TS Bases.

**3. Reactor Coolant System (RCS) Seal Line Resistance**

I&M has implemented administrative controls for seal line resistance that are more restrictive than those specified in TS 4.4.6.2.1.c. The more restrictive limits reflect the impact of the Unit 1 and 2 steam generator replacements.

**4. Reactor Coolant System Leak Detection Equipment Operability And RCS Allowable Leakage**

I&M has implemented administrative controls for Unit 1 RCS leak detection equipment operability and RCS allowable leakage that are more restrictive than those specified in TS 3.4.6.1 and TS 3.4.6.2. The more restrictive limits are needed to support a leak-before-break analysis of the pressurizer surge line. In a letter from M. W. Rencheck, I&M, to NRC Document Control Desk, C1000-20, dated October 26, 2000, I&M committed to submit a license amendment request to replace the administrative controls no later than the next refueling outage. This commitment is hereby changed to be no later than the Improved Standard Technical Specification submittal date by the end of the First Quarter, 2004.

ATTACHMENT 2 TO C1101-07

COMMITMENT

The following table identifies the action committed to by Indiana Michigan Power Company (I&M) in the document. Any other actions discussed in this submittal represent intended or planned actions by I&M. They are described to the Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

Commitment	Date
I&M will address the four Administrative Letter 98-10 issues in Attachment 1.	First Quarter 2004