

March 6, 1995

Mr. E. E. Fitzpatrick, Vice President
Indiana Michigan Power Company
c/o American Electric Power Service Corporation
1 Riverside Plaza
Columbus, OH 43215

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2 - ISSUANCE OF
AMENDMENTS RE: REVIEW AND AUDIT REQUIREMENTS FOR THE EMERGENCY AND
SECURITY PLANS (TAC NOS. M90759 AND M90760)

Dear Mr. Fitzpatrick:

The Commission has issued the enclosed Amendment No. 192 to Facility Operating License No. DPR-58 and Amendment No. 178 to Facility Operating License No. DPR-74 for the Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated October 7, 1994.

The amendments remove the audit of the emergency and security plans and implementing procedures from the list of responsibilities of the Nuclear Safety and Design Review Committee (NSDRC). The amendments also remove the requirements for Plant Nuclear Safety Review Committee (PNSRC) review of the emergency and security plans, their implementing procedures, and changes to the implementing procedures. Changes to the composition of the PNSRC and the NSDRC are also made to reflect organizational changes. Finally, the references to the Plant Manager in Section 6 are revised to Site Vice President/Plant Manager, or designee.

A copy of our related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

ORIGINAL SIGNED BY

John B. Hickman, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316
Enclosures: 1. Amendment No. 192 to DPR-58
2. Amendment No. 178 to DPR-74
3. Safety Evaluation
cc w/encls: See next page

DOCUMENT NAME: G:\WPDOCS\DCCOOK\C090759.AMD

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Mr. E. E. Fitzpatrick
Indiana Michigan Power Company

Donald C. Cook Nuclear Plant

cc:

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Lansing, Michigan 48909

DATED: March 6, 1995

AMENDMENT NO. 192 TO FACILITY OPERATING LICENSE NO. DPR-58-D. C. COOK-UNIT 1
AMENDMENT NO. 178 TO FACILITY OPERATING LICENSE NO. DPR-74-D. C. COOK-UNIT 2

Docket File

PUBLIC

PDIII-1 Reading

J. Roe

J. Hannon

C. Jamerson

J. Hickman (2)

OGC

G. Hill (4)

C. Grimes, 0-11F23

T. Dunning

W. Reckley

ACRS (4)

OPA

OC/LFDCB

W. Kropp, RIII

SEDB

cc: Plant Service list

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-315

DONALD C. COOK NUCLEAR PLANT, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 192
License No. DPR-58

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Indiana Michigan Power Company (the licensee) dated October 7, 1994, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-58 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 192, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John N. Hannon, Director
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: March 6, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 192

TO FACILITY OPERATING LICENSE NO. DPR-58

DOCKET NO. 50-315

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

REMOVE

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ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Superintendent who must hold or have held a Senior Operator License as specified in Section 6.2.2.h.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.

6.5 REVIEW AND AUDIT

6.5.1 PLANT NUCLEAR SAFETY REVIEW COMMITTEE (PNSRC)

FUNCTION

6.5.1.1 The PNSRC shall function to advise the Site Vice President/Plant Manager, or designee, on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PNSRC shall be composed of Assistant Plant Managers, Department Superintendents, or supervisory personnel reporting directly to the Site Vice President/Plant Manager, Assistant Plant Managers or Department Superintendents. The membership shall represent the functional areas of the plant, including, but not limited to Operations, Technical Support, Licensing, Maintenance and Radiation Protection.

The PNSRC membership shall consist of at least one individual from each of the areas designated. All members, including the Chairman and his alternates, the members and their alternates, shall be designated by the Site Vice President/Plant Manager.

PNSRC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 of ANSI N18.1-1971 except for the requirement to hold a current Senior Operator License. The operations individual must hold or have held a Senior Operator License at Cook Nuclear Plant or a similar reactor. The maintenance individual shall meet the qualifications of Section 4.2.3 of ANSI N18.1-1971.

ADMINISTRATIVE CONTROLS

- h. Performance of special reviews, investigations of analyses and reports thereon as requested by the Chairman of the NSDRC.
- i. Deleted.
- j. Deleted.
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluations, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Senior Vice President - Nuclear Generation and to the NSDRC.
- l. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment system.

AUTHORITY

6.5.1.7 The PNSRC shall:

- a. Recommend to the Site Vice President/Plant Manager, or designee, written approval or disapproval of items considered under 6.5.1.6 (a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6 (a) through (c) and (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Senior Vice President - Nuclear Generation and the NSDRC of disagreement between the PNSRC and the Site Vice President/Plant Manager; however, the Site Vice President/Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The PNSRC shall maintain written minutes of each meeting and copies shall be provided to the Chairman of the NSDRC.

6.5.2 NUCLEAR SAFETY AND DESIGN REVIEW COMMITTEE (NSDRC)

FUNCTION

6.5.2.1 The NSDRC shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering

ADMINISTRATIVE CONTROLS

- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.5.2.2 The NSDRC shall be composed of the following regular members:

- 1. Senior Vice President - Nuclear Generation (NSDRC Chairman)
- 2. Manager - Nuclear Safety, Licensing, & Fuel Division (NSDRC Secretary)
- 3. Site Vice President/Plant Manager - Donald C. Cook Nuclear Plant
- 4. Vice President - Indiana Michigan Power Company
- 5. Executive Vice President - Engineering & Construction
- 6. Vice President - Transmission and Distribution Services
- 7. Senior Vice President - Fossil and Hydro Generation
- 8. Manager - Nuclear Engineering Department
- 9. Vice President - Civil Engineering
- 10. Manager - Nuclear Plant Engineering Support Division
- 11. Manager - Nuclear Support Services Department
- 12. Manager - Quality Assurance Department
- 13. Manager - Production Support and Administrative Services Section

Additional members and Vice Chairman may be appointed by the President and Chief Operating Officer.

ALTERNATES

6.5.2.3 Designated alternate members shall be appointed by the President and Chief Operating Officer or such other person as he shall designate. In addition, temporary alternate members may be appointed by the NSDRC Chairman to serve on an interim basis, as required. Temporary alternate members are empowered to act on the behalf of the regular or designated alternate members for whom they substitute.

ADMINISTRATIVE CONTROLS

- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- i. Reports and meeting minutes of the PNSRC.

AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NSDRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training, and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. Deleted.
- f. Deleted.
- g. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
- h. The fire protection equipment and program implementation at least once per 12 months using either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- i. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.

ADMINISTRATIVE CONTROLS

shall be approved by the appropriate department head as previously designated in writing by the Site Vice President/Plant Manager, or designee. The Site Vice President/Plant Manager, or designee, shall approve Plant Manager Procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for implementation by two members of the plant staff, at least one of whom holds a Senior Operator license, and documented. The temporary changes shall be approved by the original approval authority within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation.

- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Site Vice President/Plant Manager, or designee. Each such modification shall be reviewed (reference T/S 6.5.3.1.e) by a qualified (reference T/S 6.5.3.1.d) individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the Site Vice President/Plant Manager, or designee.
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by qualified individuals/groups other than the individual/group which prepared the proposed test or experiment to assure cross-disciplinary review as appropriate for the proposed test or experiment. Proposed tests and experiments shall be approved before implementation by the Site Vice President/Plant Manager, or designee.
- d. Individuals who conducted the reviews performed in the accordance with Specification 6.5.3.1a, 6.5.3.1b, and 6.5.3.1c, shall be members of the plant management staff previously designated by the Site Vice President/Plant Manager and shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to the approval of the Site Vice President/Plant Manager, or designee, for implementation.
- f. Deleted.

ADMINISTRATIVE CONTROLS

TECHNICAL REVIEW AND CONTROL (continued)

- g. Deleted.

6.5.3.2 Records of the above activities shall be provided to the Site Vice President/Plant Manager, or designee, PNSRC and/or the NSDRC as necessary for required reviews.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by the PNSRC, and the results of this review shall be submitted to the NSDRC and the Senior Vice President - Nuclear Generation.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Chairman of the NSDRC shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSRC. This report shall describe (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems or structures; and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the Chairman of the NSDRC and the Senior Vice President - Nuclear Generation within 14 days of the violation.
- d. Operation of the unit shall not be resumed until authorized by the Commission.

ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.
- b. Deleted.
- c. Deleted.
- d. PROCESS CONTROL PROGRAM implementation.
- e. OFFSITE DOSE CALCULATION MANUAL implementation.
- f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Specification 6.5 above.

6.8.3 A plant program for post-accident sampling shall be established, implemented, and maintained which will ensure the capability to obtain and analyze reactor coolant samples, containment atmosphere noble gas samples, and unit vent gaseous effluent samples for iodines and particulates under accident conditions. The program will include the following:

- a. Training of personnel,
- b. Procedures for sampling and analysis,
- c. Provisions for maintenance of sampling and analysis equipment.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-316

DONALD C. COOK NUCLEAR PLANT, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 178
License No. DPR-74

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Indiana Michigan Power Company (the licensee) dated October 7, 1994, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

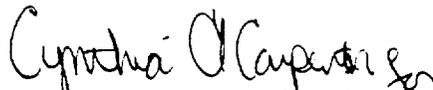
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-74 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 178, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John N. Hannon, Director
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: **March 6, 1995**

ATTACHMENT TO LICENSE AMENDMENT NO. 178

FACILITY OPERATING LICENSE NO. DPR-74

DOCKET NO. 50-316

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

REMOVE

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ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Superintendent, who must hold or have held a Senior Operator License as specified in Section 6.2.2.h.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.

6.5 REVIEW AND AUDIT

6.5.1 PLANT NUCLEAR SAFETY REVIEW COMMITTEE (PNSRC)

FUNCTION

6.5.1.1 The PNSRC shall function to advise the Site Vice President/Plant Manager, or designee, on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PNSRC shall be composed of Assistant Plant Managers, Department Superintendents, or supervisory personnel reporting directly to the Site Vice President/Plant Manager, Assistant Plant Managers or Department Superintendents. The membership shall represent the functional areas of the plant, including, but not limited to Operations, Technical Support, Licensing, Maintenance and Radiation Protection.

The PNSRC membership shall consist of at least one individual from each of the areas designated. All members, including the Chairman and his alternates, the members and their alternates, shall be designated by the Site Vice President/Plant Manager.

PNSRC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 of ANSI N18.1-1971 except for the requirement to hold a current Senior Operator License. The operations individual must hold or have held a Senior Operator License at Cook Nuclear Plant or a similar reactor. The maintenance individual shall meet the qualifications of Section 4.2.3 of ANSI N18.1-1971.

ADMINISTRATIVE CONTROLS

- h. Performance of special reviews, investigations of analyses and reports thereon as requested by the Chairman of the NSDRC.
- i. Deleted.
- j. Deleted.
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluations, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Senior Vice President - Nuclear Generation and to the NSDRC.
- l. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment system.

AUTHORITY

6.5.1.7 The PNSRC shall:

- a. Recommend to the Site Vice President/Plant Manager, or designee, written approval or disapproval of items considered under 6.5.1.6 (a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6 (a) through (c) and (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Senior Vice President -Nuclear Generation and the NSDRC of disagreement between the PNSRC and the Site Vice President/Plant Manager; however, the Site Vice President/Plant Manager, or designee, shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The PNSRC shall maintain written minutes of each meeting and copies shall be provided to the Chairman of the NSDRC.

6.5.2 NUCLEAR SAFETY AND DESIGN REVIEW COMMITTEE (NSDRG)

FUNCTION

6.5.2.1 The NSDRG shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering

ADMINISTRATIVE CONTROLS

- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.5.2.2 The NSDRRC shall be composed of the following regular members:

1. Senior Vice President - Nuclear Generation (NSDRRC Chairman)
2. Manager - Nuclear Safety, Licensing, & Fuel Division - (NSDRRC Secretary)
3. Site Vice President/Plant Manager - Donald C. Cook Nuclear Plant
4. Vice President - Indiana Michigan Power Company
5. Executive Vice President - Engineering & Construction
6. Vice President - Transmission and Distribution Services
7. Senior Vice President - Fossil and Hydro Generation
8. Manager - Nuclear Engineering Department
9. Vice President - Civil Engineering
10. Manager - Nuclear Plant Engineering Support Division
11. Manager - Nuclear Support Services Department
12. Manager - Quality Assurance Department
13. Manager - Production Support and Administrative Services Section

Additional members and Vice Chairman may be appointed by the President and Chief Operating Officer.

ALTERNATE MEMBERS

6.5.2.3 Designated alternate members shall be appointed by the President and Chief Operating Officer or such other person as he shall designate. In addition, temporary alternate members may be appointed by the NSDRRC Chairman to serve on an interim basis, as required. Temporary alternate members are empowered to act on the behalf of the regular or designated alternate members for whom they substitute.

ADMINISTRATIVE CONTROLS

- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- i. Reports and meeting minutes of the PNSRC.

AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NSDRG. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training, and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. Deleted.
- f. Deleted.
- g. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
- h. The fire protection equipment and program implementation at least once per 12 months using either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- i. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.

ADMINISTRATIVE CONTROLS

shall be approved by the appropriate department head as previously designated in writing by the Site Vice President/Plant Manager, or designee. The Site Vice President/Plant Manager, or designee, shall approve Plant Manager Procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for implementation by two members of the plant staff, at least one of whom holds a Senior Operator license, and documented. The temporary changes shall be approved by the original approval authority within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation.

- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Site Vice President/Plant Manager, or designee. Each such modification shall be reviewed (reference T/S 6.5.3.1.e) by a qualified (reference T/S 6.5.3.1.d) individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the Site Vice President/Plant Manager, or designee.
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by qualified individuals/groups other than the individual/group which prepared the proposed test or experiment to assure cross-disciplinary review as appropriate for the proposed test or experiment. Proposed tests and experiments shall be approved before implementation by the Site Vice President/Plant Manager, or designee.
- d. Individuals who conducted the reviews performed in accordance with Specification 6.5.3.1a, 6.5.3.1b, and 6.5.3.1c, shall be members of the plant management staff previously designated by the Site Vice President/Plant Manager and shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to the approval of the Site Vice President/Plant Manager, or designee, for implementation.
- f. Deleted.

ADMINISTRATIVE CONTROLS

TECHNICAL REVIEW AND CONTROL (continued)

g. Deleted.

6.5.3.2 Records of the above activities shall be provided to the Site Vice President/Plant Manager, or designee, PNSRC and/or the NSDRC as necessary for required reviews.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by the PNSRC, and the results of this review shall be submitted to the NSDRC and the Senior Vice President - Nuclear Generation.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Chairman of the NSDRC shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSRC. This report shall describe (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems or structures; and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the Chairman of the NSDRC and the Senior Vice President - Nuclear Generation within 14 days of the violation.
- d. Operation of the unit shall not be resumed until authorized by the Commission.

ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.
- b. Deleted.
- c. Deleted.
- d. PROCESS CONTROL PROGRAM implementation.
- e. OFFSITE DOSE CALCULATION MANUAL implementation.
- f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Specification 6.5 above.

6.8.3 A plant program for post-accident sampling shall be established, implemented, and maintained which will ensure the capability to obtain and analyze reactor coolant samples, containment atmosphere noble gas samples, and unit vent gaseous effluent samples for iodines and particulates under accident conditions. The program will include the following:

- a. Training of personnel,
- b. Procedures for sampling and analysis,
- c. Provisions for maintenance of sampling and analysis equipment.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 192 TO FACILITY OPERATING LICENSE NO. DPR-58
AND AMENDMENT NO. 178 TO FACILITY OPERATING LICENSE NO. DPR-74

INDIANA MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-315 AND 50-316

1.0 INTRODUCTION

By letter dated October 7, 1994, the Indiana Michigan Power Company (the licensee) requested amendments to the Technical Specifications (TS) appended to Facility Operating License Nos. DPR-58 and DPR-74 for the Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2. The proposed amendments would remove the audit of the emergency and security plans and implementing procedures from the list of responsibilities of the Nuclear Safety and Design Review Committee (NSDRC). The proposed amendments also remove the requirements for Plant Nuclear Safety Review Committee (PNSRC) review of the emergency and security plans, their implementing procedures, and changes to the implementing procedures. The proposed change would remove administrative controls for the emergency and security plans from the TS that duplicate the provisions in Parts 50 and 73 of Title 10 of the Code of Federal Regulations (10 CFR). The TS provisions related to the review activities for the emergency and security plans would be relocated, respectively, to those plans. The NRC issued guidance to all holders of operating licenses for nuclear power reactors on the proposed change by Generic Letter (GL) 93-07, "Modification of Technical Specification Administrative Control Requirements for Emergency and Security Plans," dated December 28, 1993. In addition to the above proposed changes, the licensee proposed to revise the listed composition of the PNSRC and the NSDRC to reflect organizational changes and to revise the position of "Plant Manager" to "Site Vice President/Plant Manager, or his designee."

2.0 BACKGROUND

The NRC staff undertook efforts in the early 1980's to address problems related to the content of nuclear power plant TS. These projects have resulted in the issuance of various reports, proposed rulemakings, and Commission policy statements. Line item improvements became a mechanism for TS improvement as part of the implementation of the Commission's interim policy statement on TS improvements published on February 6, 1987 (52 FR 3788). The final Commission policy statement on TS improvements was published July 22, 1993 (58 FR 39132). The final policy statement provided criteria which can be used to establish, more clearly, the framework for TS. The staff

has maintained the line item improvement process, through the issuance of generic letters, in order to improve the content and consistency of TS and to reduce the licensee and staff resources required to process amendments related to those specifications being relocated from the TS to other licensee documents as a result of the implementation of the Commission's final policy statement.

Section 50.36 of Title 10 of the Code of Federal Regulations establishes the regulatory requirements for licensees to include TS as part of applications for operating licenses. The rule requires that TS include items in five specified categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. In addition, the Commission's final policy statement on TS improvements and other Commission documents provide guidance regarding the required content of TS. The fundamental purpose of the TS, as described in the Commission's final policy statement, is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety by identifying those features that are of controlling importance to safety and establishing on them certain conditions of operation which cannot be changed without prior Commission approval.

The Commission's final policy statement recognized, as had previous statements related to the staff's TS improvement program, that implementation of the policy would result in the relocation of existing TS requirements to licensee-controlled documents such as the Updated Final Safety Analysis Report (UFSAR). Those items relocated to the UFSAR would in turn be controlled in accordance with the requirements of 10 CFR 50.59, "Changes, tests and experiments." Section 50.59 of Title 10 of the Code of Federal Regulations provides criteria to determine when facility or operating changes planned by a licensee require prior Commission approval in the form of a license amendment in order to address any unreviewed safety questions. In the case of this proposed amendment, changes would be controlled by the requirements of 10 CFR 50.54(p) and 10 CFR 50.54(q). These regulations require NRC review and approval for changes which would decrease the effectiveness of the security plan, guard training and qualification plan, or the emergency plan. NRC inspection and enforcement programs also enable the staff to monitor facility changes and licensee adherence to UFSAR commitments and to take any remedial action that may be appropriate.

3.0 EVALUATION

The licensee proposed modifying TS 6.5.1.6 by removing items i and j, which reference the security and emergency plans, respectively, and their implementing procedures under the review responsibilities of the PNSRC. The licensee proposed modifying TS 6.5.2.8 by removing items e and f, which reference the security and emergency plans, respectively, and their implementing procedures under the audit responsibilities of the NSDRC, which are to be performed at least once every 12 months. The licensee also proposed modifying TS 6.8.1 by removing items b, Security Plan implementation, and c, Emergency Plan implementation, from the list of activities for which this

specification requires that written procedures be established, implemented, and maintained. The TS provisions related to the PNSRC review activities for the emergency and security plans, their implementing procedures, and changes to those procedures have been relocated, respectively, to those plans.

The licensee has proposed TS changes that are consistent with the NRC guidance in GL 93-07 and that eliminate TS provisions that duplicate the requirements in 10 CFR Parts 50 and 73. The changes associated with the implementation of GL 93-07 involve the deletion of certain requirements related to procedures for security and emergency plan implementation and review responsibilities of the PNSRC and NSDRC for those plans and procedures. These requirements are already adequately addressed in 10 CFR Parts 50 and 73 and are therefore, redundant. Because the elimination of the procedure and review requirements from the TS do not alter the requirements for maintaining adequate procedures for the security and emergency plans or for the necessary reviews and audits to be performed, the staff has concluded that the proposed removal is acceptable.

The staff's determination is based on the fact that the removal of the specific requirements related to procedures for security and emergency plan implementation and review responsibilities of the PNSRC and NSDRC for those plans and procedures does not eliminate the requirements for the licensee to ensure that the security and emergency programs are capable of performing their required function. Although the requirements are removed from the TS, the licensee must continue to evaluate any changes in accordance with 10 CFR 50.54(p), for the security plan, and 10 CFR 50.54(q), for the emergency plan. Should the licensee's determination conclude that an unreviewed safety question is involved, due to either (1) an increase in the probability or consequences of accidents or malfunctions of equipment important to safety, (2) the creation of a possibility for an accident or malfunction of a different type than any evaluated previously, (3) a reduction in the margin of safety, or (4) a decrease in the effectiveness of the security plan or guard training and qualification program or the emergency plans, NRC approval and a license amendment would be required prior to implementation of the change.

The staff's review concluded that 10 CFR 50.36 does not require the security and emergency procedures and review requirements to be retained in TS. The security and emergency procedures and review requirements are considered to be an operational detail which are adequately controlled by the requirements of 10 CFR 50.54(p) and 10 CFR 50.54(q). Therefore, the security and emergency procedures and review requirements do not constitute a condition or limitation on operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, in that the ability of the security and emergency programs to perform their safety functions are not adversely impacted by the deletion of the requirements from the TS.

These TS changes are consistent with the guidance provided in GL 93-07 and the TS requirements of 10 CFR 50.36. The staff has determined that the proposed changes to the TS for the D. C. Cook Nuclear Plant, Units 1 and 2, are acceptable.

In addition to the above, the licensee proposed changes to Section 6, "Administrative Controls," of the TS to revise the listed composition of the PNSRC and the NSDRC to reflect organizational changes and to revise the position of "Plant Manager" to "Site Vice President/Plant Manager, or his designee." The changes to the composition of the PNSRC and the NSDRC reflect organizational changes, are administrative in nature, and are therefore acceptable. The change in the title of "Plant Manager" to "Site Vice President/Plant Manager" reflects a title change for the position, is administrative in nature, and is therefore acceptable. The addition of "or his designee" formalizes the responsibility designation which must take place when the Site Vice President/Plant Manager is unavailable to perform the function. This change is also administrative in nature and therefore acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: March 6, 1995