

September 23, 2004

Mr. Mano K. Nazar  
American Electric Power  
Senior Vice President and Chief Nuclear Officer  
Indiana Michigan Power Company  
Nuclear Generation Group  
500 Circle Drive  
Buchanan, MI 49107

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS TO DELETE SURVEILLANCE REQUIREMENTS FOR POWER RANGE, INTERMEDIATE RANGE, AND SOURCE RANGE NEUTRON FLUX MONITORS (TAC NOS. MC2474 AND MC2475)

Dear Mr. Nazar:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 283 to Facility Operating License No. DPR-58 and Amendment No. 267 to Facility Operating License No. DPR-74 for the Donald C. Cook Nuclear Plant, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated February 14, 2004, as supplemented July 26, 2004.

The amendments modify the TS 3.9.2 limiting condition for operation, delete TS surveillance requirements (SRs) 4.9.2.a and 4.9.2.b for the Source Range Neutron Flux Monitor channel functional test, revise SR 4.9.2.c for the channel check test, and add a requirement to perform a channel calibration every 18 months. In addition, the amendments revise TS 4.10.4.2 and 4.10.3.2 (Units 1 and 2, respectively) for Intermediate and Power Range channel functional test.

A copy of our related safety evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

***/CF Lyon for RA/***

John G. Lamb, Project Manager, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosures: 1. Amendment No. 283 to DPR-58  
2. Amendment No. 267 to DPR-74  
3. Safety Evaluation

cc w/encls: See next page

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NRR-058

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Donald C. Cook Nuclear Plant, Units 1 and 2

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INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-315

DONALD C. COOK NUCLEAR PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 283  
License No. DPR-58

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Indiana Michigan Power Company (the licensee) dated February 14, 2004, supplemented July 26, 2004, 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:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 283, 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 its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

L. Raghavan, Chief, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: September 23, 2004

ATTACHMENT TO LICENSE AMENDMENT NO. 283

TO FACILITY OPERATING LICENSE NO. DPR-58

DOCKET NO. 50-315

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

3/4 9-2  
3/4 10-5

INSERT

3/4 9-2  
3/4 10-5

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-316

DONALD C. COOK NUCLEAR PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 267  
License No. DPR-74

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Indiana Michigan Power Company (the licensee) dated February 14, 2004, supplemented July 26, 2004, 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:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 267, 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 its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

L. Raghavan, Chief, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: September 23, 2004

ATTACHMENT TO LICENSE AMENDMENT NO. 267

FACILITY OPERATING LICENSE NO. DPR-74

DOCKET NO. 50-316

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

3/4 9-2  
3/4 10-3

INSERT

3/4 9-2  
3/4 10-3

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 283 O FACILITY OPERATING LICENSE NO. DPR-58  
AND AMENDMENT NO. 267 O FACILITY OPERATING LICENSE NO. DPR-74  
INDIANA MICHIGAN POWER COMPANY  
DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-315 AND 50-316

## 1.0 INTRODUCTION

By application to the U.S. Nuclear Regulatory Commission (NRC) dated February 14, 2004 (ADAMS Accession No. ML04550536), supplemented July 26, 2004 (ML042100233), the Indiana Michigan Power Company (I&M or the licensee) requested amendments to the Technical Specifications (TSs) for the Donald C. Cook Nuclear Plant, Units 1 and 2. The proposed amendments would modify the TS 3.9.2 limiting condition for operation, delete TS Surveillance Requirements (SRs) 4.9.2.a and 4.9.2.b for the Source Range Neutron Flux Monitor channel functional test, revise SR 4.9.2.c for the channel check test, and add a requirement to perform a channel calibration every 18 months. In addition, the requested amendments would revise TS 4.10.4.2 and 4.10.3.2 (Units 1 and 2 respectively) for Intermediate and Power Range channel functional test.

The changes to SRs 4.10.4.2 and 4.10.3.2 are related to Technical Specifications Task Force Traveler-108 (TSTF-108) (Reference 1), "Eliminate the 12 hour Channel Operational Test (COT) on Power Range and Intermediate Range Channels for Physics Test Exceptions." The licensee did not request the adoption of TSTF-108 in its original application, but the proposed changes are essentially the implementation of TSTF-108 with a deviation in the surveillance test interval (STI) that supports TSTF-108. This deviation has been justified by the adoption of TSTF-411 (Reference 2), "Surveillance Test Extensions for Components of the Reactor Protection System (WCAP-15376-P)," and approved by the NRC staff for D.C. Cook Nuclear Plant on May 23, 2003 (Reference 3).

The supplement dated July 26, 2004, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on May 11, 2004 (69 FR 26191).

## 2.0 REGULATORY EVALUATION

The purpose of the Nuclear Instrumentation System (NIS) is to monitor the power level of the reactor at anytime during operation. It is used primarily for plant protection, providing appropriate alarm functions for various phases of plant operating and shutdown conditions. It

provides a secondary control function and indicates reactor status during startup and power operation. The NIS consists of three overlapping ranges of instrumentation: Source, Intermediate, and Power. Each range provides overpower trip protection at increasing levels during startup and at power operation.

The NIS provides indication, alarm, control, and trip signals along with the capability to monitor neutron flux over the complete range from reactor shutdown to 120 percent full power. The system generates permissive and level trip signals which are then coupled to the logic matrices of the reactor trip system. This interface either allows power changes based upon proper functioning of the next range of measurement instrumentation or shuts down the reactor as unsafe operating limits are approached.

The NIS is designed to initiate nuclear overpower reactor trip signals for the reactor trip system (RTS) as a result of detecting high neutron flux or a high neutron flux rate of change and to monitor the neutron flux during and following an accident. This system offers diverse protection against fuel cladding failure and/or loss of reactor coolant system integrity.

The Power Range, Intermediate Range, and Source Range neutron flux monitors are part of the NIS excore neutron detectors. The RTS SRs require a CHANNEL FUNCTIONAL TEST be performed on these monitors to verify OPERABILITY of all devices in the channel required for channel OPERABILITY.

According to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Appendix A, General Design Criteria (GDC) 13, "Instrumentation and Controls", instrumentation shall be provided to monitor variables and systems over their operating ranges during normal operation, anticipated operational occurrences, and for accident conditions as appropriate to assure adequate safety.

The regulatory basis of Limiting Condition for Operation (LCO) 3.9.2 requires the OPERABILITY of the source range neutron flux monitors to ensure that redundant monitoring capability is available to detect changes in reactivity condition of the core during refueling operations.

The regulatory basis of LCO 3.10.4 (Unit 1) and LCO 3.10.3 (Unit 2) is to permit relaxations of existing LCOs to allow certain PHYSICS TESTS to be performed in MODE 2. In order to suspend the applicable LCOs during the tests, LCO 3.10.4 and LCO 3.10.3 require certain limitations in thermal power and reactor trip setpoints for Intermediate and Power Range channels. SR 4.10.4.2, which is part Unit 1 TS 3/4.10, requires a CHANNEL FUNCTIONAL TEST for each Intermediate and Power Range channel within 12 hours prior to initiating the PHYSICS TESTS in order to ensure that the RTS is properly aligned to provide the required degree of core protection during the performance of the PHYSICS TESTS. Similarly, SR 4.10.3.2, which part of Unit 2 TS 3/4.10, requires a similar channel test in MODE 2 prior to PHYSICS TESTS .

On May 2, 1997, the NRC approved TSTF-108. This TSTF allowed the deletion of the CHANNEL FUNCTIONAL TEST required by SR 3.1.10.1 and SR 3.4.19.2 within 12 hours prior

to the initiation of PHYSICS TESTS<sup>1</sup>. The justification of the proposed change on TSTF-108 relied, mainly, on the fact that a CHANNEL FUNCTIONAL TEST is required for Intermediate Range and Power Range neutron flux monitors by RTS SR every 92 days. The 92-day frequency has been determined by the staff to be sufficient for verification that the Power Range and Intermediate Range are properly functioning.

By letter dated September 13, 2000 (Reference 4), the NRC approved the adoption of TSTF-108 for Watts Bar Nuclear Plant, Unit 1. The licensee requested to eliminate the COT that is required 12 hours prior to PHYSICS TESTS from SR 3.1.10.1<sup>2</sup> (LCO 3.1.10, Physics Tests Exemptions-Mode 2).

The NRC staff also evaluated the proposed amendment pursuant to 10 CFR 50.36, "Technical Specifications."

### 3.0 EVALUATION

#### 3.1 TS 3.9.2 Limiting Condition for Operation Evaluation

I&M requested an amendment to TS 3/4.9, "Refueling Operations," LCO 3.9.2 (Units 1 and 2). Unit 1 LCO 3.9.2 requires two source range neutron flux monitors be operating, each with continuous visual indication in the control room and one with audible indication in the containment. Unit 2 LCO 3.9.2 requires two source range neutron flux monitors be operating, each with continuous visual indication in the control room and one with audible indication in the containment and control room. The licensee requested the following changes to the LCOs mentioned above.

- 1) Deletion of the requirement for "audible indication in the containment" from Unit 1 LCO 3.9.2 to specify that an "audible count rate circuit to be OPERABLE."
- 2) Deletion of the requirement for "audible indication in the containment and control room" from Unit 2 LCO 3.9.2 to specify that an "audible count rate circuit to be OPERABLE."

The licensee states that the changes to LCO 3.9.2 are consistent with the Standard Technical Specifications (STS) and provides the flexibility to place the audible indications in locations where they will be most effective in alerting the appropriate personnel when core reactivity changes occur during refueling operations. Specifically, the audible indication is an initial indication available to operators of a boron dilution event during refueling operations. Therefore, any changes in the location of the audible indication may have an impact on its ability to perform the intended safety function. The NRC staff reviewed the removal of the requirement to specify the location of the audible count rate circuit to ensure that the change would not impact the intended safety function. The licensee provided information which demonstrated that any changes in the location of the audible indication would be reviewed in

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<sup>1</sup> SR 3.1.10.1 and SR 3.4.19.2 correspond to Westinghouse Standard Technical Specifications, Revision 1, April 7, 1995. SR 3.1.10.1 is equivalent to D. C. Cook's SR 4.10.4.2 and SR 4.10.3.2.

<sup>2</sup> Watts Bar's SR 3.1.10.1 is equivalent to D. C. Cook's SR 4.10.4.2 and SR 4.10.3.2

accordance with established plant procedures and the 10 CFR 50.59 process. These procedures require that the licensee perform an assessment of the impacts of a change on other functional areas and documents, including operations, training, procedures, and the Updated Final Safety Analysis Report. Based on these requirements, I&M will ensure that operators will have prompt and timely indication of a boron dilution event from the source range audible indication. The NRC staff determined, based on additional information submitted by the licensee, that sufficient controls exist at D. C. Cook Nuclear Plant to ensure that the proposed changes will not adversely affect plant safety.

In relation to the proposed changes to LCO 3.9.2, the NRC staff requested the licensee revise the term "operating" in the subject LCO. I&M intends to make the LCO consistent with the STS, which use the term "OPERABLE" to describe the required functional condition of the source range neutron flux monitors during MODE 6. However, the D. C. Cook TS uses the term "operating" to describe the same functional condition. In the request for additional information response, dated July 26, 2004, I&M explained that the term "operating" requires the source range neutron flux monitors to be OPERABLE. This is reflected in the current D. C. Cook TS Bases of LCO 3.9.2, which refers to the OPERABILITY of the source range neutron flux monitors. In addition, I&M submitted a license amendment request to adopt the Improved STS by letter dated April 6, 2004, (References 5 & 6). In this license amendment request, which is under the NRC staff review, the licensee requested to use the term "OPERABLE" in LCO 3.9.2.

Therefore, the NRC staff has no safety concerns with regard to the term "operating" versus "OPERABLE", since the licensee requires the subject nuclear instrumentation be OPERABLE under the interpretation of "operating" and the request to replace "operating" by "OPERABLE" has been requested in the licensee's Improved STS conversion. The NRC staff finds the proposed changes to LCO 3.9.2 to be acceptable and in compliance with the regulations, including 10 CFR 50.36(c)(2).

### 3.2 SR 4.10.4.2 and SR 4.10.3.2 Evaluation

In addition, I&M requested an amendment to TS 3/4.10, "Special Tests Exceptions," for both Units. Unit 1 TS 3/4.10 contains SR 4.10.4.2, which requires a CHANNEL FUNCTIONAL TEST for each Intermediate and Power Range channel within 12 hours prior to initiating PHYSICS TESTS in MODE 2. Similarly, Unit 2 TS 3/4.10 contains SR 4.10.3.2, which requires a CHANNEL FUNCTIONAL TEST for each Intermediate and Power Range channel within 12 hours prior to initiating PHYSICS TESTS in MODE 2. The licensee requested the following changes to the SRs mentioned above.

- 1) Deletion of the "within 12 hours" requirement from the SR 4.10.4.2 to specify that the CHANNEL FUNCTIONAL TEST is only required prior to initiating the PHYSICS TESTS.
- 2) Deletion of the "within 12 hours" requirement from the SR 4.10.3.2 to specify that the CHANNEL FUNCTIONAL TEST is only required prior to initiating the PHYSICS TESTS.

The licensee states that the deletion of the 12-hour time requirement does not result in a significant change to the power range and intermediate range SRs. I&M states that the intermediate range and power range neutron flux monitors are required to be operable prior to

entering MODE 2, where PHYSICS TESTS are performed. The initiation of PHYSICS TESTS does not affect the ability of the equipment to perform its function, does not affect the trip setpoints or the reactor trip capabilities, and does not invalidate the previous surveillances. I&M concludes that requiring this testing be performed at a fixed time before the initiation of physics tests provides no benefit.

Operational tests and calibration of Power and Intermediate Range monitors are performed in the following frequency, according to TS Table 4.3-1, "Reactor Trip System Instrumentation Surveillance Requirements:"

- 1) CHANNEL CALIBRATION of Power Range, High Positive Rate, at refueling outage frequency
- 2) CHANNEL CALIBRATION of Power Range, High Negative Rate, at refueling outage frequency
- 3) CHANNEL CALIBRATION of Intermediate Range at refueling outage frequency
- 4) CHANNEL FUNCTIONAL TEST of Power Range quarterly and prior to start up (if not performed in previous 7 days)
- 5) CHANNEL FUNCTIONAL TEST of Intermediate Range prior to start up (if not performed in previous 184 days)
- 6) CHANNEL FUNCTIONAL TEST of Power Range, High Positive Rate, quarterly
- 7) CHANNEL FUNCTIONAL TEST of Power Range, High Negative Rate, quarterly

TSTF-108 relies on the fact that RTS SRs require the performance of CHANNEL OPERATIONAL TESTS for Power Range and Intermediate Range every 92 days. The 92-day frequency has been determined to be sufficient for verification that the Power Range and Intermediate Range are properly functioning. Also, it relied on the fact that initiation of PHYSICS TESTS does not impact the ability of the neutron flux monitors to perform their required function, does not affect the trip setpoints or RTS trip capability, and does not invalidate previous surveillances.

The licensee's request deviates from TSTF-108 because the STI for the Channel Functional Test of Intermediate Range monitors is 184 days. However, TSTF-411 allows the extension of the STI for Channel Operational Test of Power and Intermediate Range Neutron Flux Monitors to 184 days. By letter dated May 23, 2003, the NRC staff approved the adoption of TSTF-411 for D. C. Cook Nuclear Plant. As a result of this TSTF implementation, the STI for Power and Intermediate Range Neutron Flux Monitors changed from 31 days to 92 days, and from 7 days to 184 days, respectively. These STIs have been demonstrated to be appropriate to verify that the power and intermediate range neutron flux monitors are properly functioning. In addition, the licensee states that the intermediate range neutron flux monitors are subjected to a channel functional test each refueling outage, since I&M's definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.

The NRC staff has reviewed the licensee's request to amend TS 3/4.10 and, based on the information provided by the licensee, finds it to be acceptable. The NRC staff agrees with the licensee's technical evaluation that the frequencies of D. C. Cook's RTS SRs are sufficient to demonstrate that the Intermediate and Power Range monitors are properly functioning. D. C. Cook's RTS SRs provide a similar testing approach to the SRs that support the TSTF-108. The deviation from TSTF-108 with regard to the STI for Intermediate Range monitors is justified by the adoption of TSTF-411. The NRC staff agrees that additional testing within 12 hours of a

physics test is not necessary for D. C. Cook Nuclear Plant, Units 1 and 2. The proposed change has no impact on the assumptions of any transient or accident analysis in the Updated Final Safety Analysis Report.

Therefore, the NRC staff finds that the deletion of the "within 12 hour" requirement from SR 4.10.4.2 and SR 4.10.3.2 is acceptable and in compliance with the regulations, including 10 CFR 50.36(c)(3).

### 3.3 SR 4.9.2.a and SR 4.9.2.b Evaluation

SR 4.9.2.a and SR 4.9.2.b requires a channel functional test be performed at least once per 7 days and within 8 hours prior to the initial start of core alterations. The proposed amendments would delete these SRs. These SRs to specifically perform only a channel functional test of the source range neutron flux monitor in Mode 6 are inappropriate, since the purpose of a channel functional test is to verify that alarms activate and/or equipment functions when an adverse condition is detected by the sensors. The channel functional test injects a simulated signal into the channel as close to the primary sensor as practicable to verify operability, including alarm and/or trip functions. However, In Mode 6, the source range neutron flux monitor is not an automatic system and does not provide an alarm required to meet the TS 3.9.2 LCO or a trip function. Therefore, these SRs are not actually applicable in this condition. The channel calibration is the appropriate test to verify operability of the indication-only channel. TS Table 4.3-1 requires a channel functional test be performed prior to startup and monthly during Modes 2, 3, 4, and 5 (below the Permissive P-6 block of source range reactor trip) when this channel does perform a trip function.

Therefore, the NRC staff finds these proposed changes to delete the channel functional test and to add the channel calibration are acceptable and in compliance with the regulations, including 10 CFR 50.36(c)(3).

### 3.4 SR 4.9.2.c Evaluation

SR 4.9.2.c. states that a channel check shall be performed at least once per 12 hours during core alterations. This SR is proposed to expand the SR applicability to all of Mode 6 and not just during core alterations. This proposal for expansion of the applicability provides additional assurance that the Source Range Neutron Flux Monitors are available to detect a boron dilution event as well as any other core reactivity changes. The frequency of 12 hours is consistent with the channel check frequency specified for the same instrumentation in Modes 2, 3, 4, and 5.

Therefore, the NRC staff finds the proposed change to SR 4.9.2.c acceptable and in compliance with the regulations, including 10 CFR 50.36(c)(3).

## 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

These amendments change the requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or change the surveillance requirements. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding (69 FR 26191). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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 NRC 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.

## 7.0 REFERENCES

1. Industry/TSTF Standard Technical Specification Change Traveler, TSTF-108, "*Eliminate the 12 hour Channel Operational Test (COT) on Power Range and Intermediate Range Channels for Physics Test Exceptions*," approved on May 5, 1997, ADAMS Accession No. ML040480061.
2. Industry/TSTF Standard Technical Specification Change Traveler, TSTF-411 Revision 1, "*Surveillance Test Interval Extensions for Components of the Reactor Protection System (WCAP-15376-P)*," ADAMS Accession No. ML022470164.
3. Letter to A. Christopher Bakken III, Senior Vice President and Chief Nuclear Officer of Indiana Michigan Power Company, "*Donald C. Cook Nuclear Plant, Units 1 and 2- Issuance of Amendment (TAC NOS.MB6324 and MB6325)*," ADAMS Accession No. ML031320614.
4. Letter to J.A. Scalice, Chief Nuclear Officer and Executive Vice President of Tennessee Valley Authority, "*Issuance of Amendment Regarding Physics Tests Exceptions (TS-00-08) (TAC NO. MA9519)*," September 13, 2000, ADAMS Accession No. ML0037500040.
5. License Amendment Request - "*Conversion of Current Technical Specifications (CTS) to Improved Technical Specifications (ITS)*," ADAMS Accession No. ML041200298.

6. Volume 14 D.C. Cook Nuclear Plant Units 1 and 2, *“Improved Technical Specifications Conversion, ITS Section 3.9, Refueling Operations,”* ADAMS Accession No. ML041200392.

Principal Contributors: R. Taylor  
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Date: September 23, 2004