January 16, 2005

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, UNIT 1 - ISSUANCE OF EMERGENCY AMENDMENT REGARDING ONE-TIME ALLOWED OUTAGE TIME EXTENSION FOR WEST CENTRIFUGAL CHARGING PUMP (TAC NO. MC3377)

Dear Mr. Nazar:

The Commission has issued the enclosed Amendment No. 285 to Facility Operating License No. DPR-58 for the Donald C. Cook Nuclear Plant, Unit 1. The amendment consists of changes to the Operating License in response to your application dated January 15, 2005. This request was treated as an emergency amendment in accordance with Title 10 of the *Code of Federal Regulations* Section 50.91(a)(5).

The amendment revises the Operating License to add a license condition to allow a one-time extension of the allowed outage time for the west centrifugal charging pump.

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

Sincerely,

/RA/

Carl F. Lyon, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-315

Enclosures: 1. Amendment No. 285 to DPR-58
2. Safety Evaluation

cc w/encls: See next page

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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. 285
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 January 15, 2005, 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 Facility Operating License as indicated in the attachment to this license amendment.

3. This license amendment is effective as of its date of issuance and shall be implemented immediately.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Margaret A. Kotzalas, Acting Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Operating License

Date of Issuance: January 16, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 285

FACILITY OPERATING LICENSE NO. DPR-58

DOCKET NO. 50-315

Replace the following page of Facility Operating License No. DPR-58 with the attached revised page. The changes are identified by marginal lines indicating the areas of change.

REMOVE	INSERT
4	4

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 285 TO FACILITY OPERATING LICENSE NO. DPR-58

INDIANA MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT, UNIT 1

DOCKET NO. 50-315

1.0 INTRODUCTION

By application to the U.S. Nuclear Regulatory Commission (NRC, Commission) dated January 15, 2005, the Indiana Michigan Power Company (I&M, or the licensee) requested an amendment to the Operating License for the Donald C. Cook Nuclear Plant (D.C. Cook), Unit 1. The proposed amendment would revise the Operating License to add a license condition to allow a one-time extension of the allowed outage time (AOT) for the Unit 1 west centrifugal charging pump (CCP) and emergency core cooling system (ECCS) subsystem. The extension would allow continued operation of the unit while repairs and related testing of the CCP are completed. On January 13, 2005, at 0130 (eastern standard time), the Unit 1 west CCP was declared inoperable and the 72-hour action requirements of technical specifications (TSs) 3.1.2.4 and 3.5.2, Action "a," were entered. During routine control room monitoring of plant parameters Operations personnel noted a decreasing trend on pressurizer level and determined that the west CCP was not providing the same amount of flow as it had earlier in the shift. Reports from the field indicated abnormal acrid smell and the west CCP motor as well as the discharge nozzle of the pump was warmer to the touch than normal based on operating experience. This resulted from failure of the pump rotating element. The time required for repair and testing of the Unit 1 west CCP will exceed the 72 hours allowed by TSs 3.1.2.4 and 3.5.2, Action "a." Accordingly, I&M is proposing a license amendment to extend the current 72-hour AOT by an additional 24 hours to allow completion of repair and testing of the Unit 1 west CCP. This extension would be limited to the current period of Unit 1 west CCP inoperability.

Since the licensee determined that the completion of repairs and testing to establish operability will not be completed prior to expiration of the 72-hour AOT, the licensee requested that the proposed amendment be processed as an emergency amendment as discussed in Section 5.0 of this safety evaluation.

Specifically, the proposed change would add a new License Condition to Section 2.C of the D.C. Cook, Unit 1 Facility Operating License, License No. DPR-58 as follows:

> The 72 hour allowed outage time of Technical Specifications 3.1.2.4 and 3.5.2, Action "a," which was entered at 0130 on January 13, 2005, may be extended by an additional 24 hours to complete repair and testing of the 1 West Centrifugal Charging Pump.

2.0 REGULATORY EVALUATION

TS 3.1.2.4 requires that two CCPs be operable in Modes 1, 2, 3, and 4. The Action statement for TS 3.1.2.4 requires that an inoperable CCP be restored to an operable status within 72 hours or the unit must be in at least hot standby within the next 6 hours, with an additional 48 hours to restore two CCPs or be in cold shutdown within the following 30 hours.

TS 3.5.2 requires that two independent ECCS subsystems be operable in Modes 1, 2, and 3 with each subsystem comprised, in part, of one CCP. Action "a" of TS 3.5.2 requires that an inoperable subsystem be restored to an operable status within 72 hours or the unit must be in hot shutdown within the next 12 hours.

3.0 TECHNICAL EVALUATION

3.1 Risk Assessment Evaluation

In evaluating the risk information submitted by the licensee, the NRC staff followed the three-tiered approach documented in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications."

The first tier addresses the assessment of the risk impact of the proposed change for comparison to acceptance guidelines consistent with the NRC's Safety Goal Policy Statement, as documented in RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis." In addition, the first tier aims at ensuring that the plant risk does not increase unacceptably during the period the equipment is taken out of service.

The second tier addresses the need to preclude potentially high-risk configurations that could result if equipment, in addition to that associated with the change, are taken out of service simultaneously.

The third tier addresses the establishment of an overall configuration risk management program for identifying risk-significant configurations resulting from maintenance or other operational activities, and taking appropriate compensatory measures to avoid such configurations.

3.2 Basis and Quality of Risk Assessment

RG 1.174 describes a risk-informed approach that is acceptable to the NRC for assessing the nature and impact of proposed licensing-basis changes by considering engineering issues and applying risk insights.

RG 1.177 describes a risk-informed approach that is acceptable to the NRC for assessing the nature and impact of proposed TS changes.

The licensee used its probabilistic risk assessment (PRA) model and appropriate conservative assumptions to assess the risk increase associated with operation at power for a period of 24 additional hours without an operable west CCP. The risk consideration included maintaining defense-in-depth and quantifying the PRA to determine the change in core damage frequency

(CDF) and large early release frequency (LERF) as a result of the proposed 24-hour AOT extension for the west CCP.

The NRC staff evaluated the quality of the PRA models, major assumptions, and data used in the risk assessment. This evaluation compared the applicable findings from the NRC staff's review of the PRA (developed as part of the licensee's individual plant evaluation) with the NRC's Standardized Plant Analysis Model (SPAR), Version 3.0.1, for D.C. Cook, Unit 1, as well as findings from similar evaluations of similar plants. The NRC staff found them acceptable.

3.3 Risk Impact of the Proposed Change (Tier 1)

An acceptable approach to risk-informed decisionmaking is to show that the proposed change to the licensing basis meets several key principles. One of these principles is to show that the proposed change results in a small increase in risk in terms of CDF and LERF, and is consistent with the NRC's Safety Goal Policy Statement. Acceptance guidelines for meeting this principle are presented in RG 1.174. Therefore, in accordance with the RG 1.174 guidelines, the licensee's proposed change to allow for a one-time extension of an additional 24 hours for the west CCP results in an acceptable increase in risk which is small and consistent with the NRC's Safety Goal Policy Statement.

The licensee used its PRA model of D.C. Cook, Unit 1 to calculate risk increases due to an AOT extension of 72 hours, in order to bound the proposed request of 24 hours. Both the incremental conditional core damage probability (ICCDP) and the incremental conditional large early release probability (ICLERP) were assessed. These quantities are a measure of the increase in probability of core damage and large early release, respectively, during a single outage assumed to last for the entire duration allowed by the proposed change. Based on the evaluated 72-hour extension, the results are:

ICCDP: 6.5E-8

ICLERP: 1.7E-9

For a proposed 24-hour AOT extension, the results are:

ICCDP: 2.1E-8

ICLERP: 5.6E-10

The acceptance guidance criteria are 5.0E-7 for ICCDP and 5.0E-8 for ICLERP, respectively, as outlined in RG 1.177 and RG 1.174 for permanent changes. The guideline criteria were based on the baseline CDF being smaller than 1.0E-4/reactor-year. For a temporary change, the acceptance guidance criteria should be higher than that of a permanent change by an order of magnitude. Thus, the ICCDP (2.1E-8) and ICLERP (5.6E-10) are within the acceptable values of temporary increases. The proposed 24-hour extension is bounded by the evaluation and will avoid additional risk associated with the plant shutdown and the transitional risk.

The proposed 24-hour extension is for one time only. The increase in CDF is numerically equal (approximately) to the assessed ICCDP value. Similarly, the increase in LERF is numerically

equal (approximately) to the assessed ICLERP value. The baseline CDF would be changed for the 1-year period due to the one-time, 24-hour extension of the AOT.

The change in mean CDF of D.C. Cook, Unit 1 will increase by no more than 4.3E-8/year (during the 1-year period that the proposed change will be implemented).

The change in mean LERF of D.C. Cook, Unit 1 will decrease to less than zero because there is more reduction in plant LERF risk due to plant activity restrictions than the increase in LERF risk due to the extension of the CCP outage (during the 1-year period that the proposed change will be implemented).

According to RG 1.174 guidelines, the estimated increases in the mean values of CDF and LERF are small and of low risk significance.

External events are not considered in the analysis. For the proposed short duration of 24 hours, the probability of having earthquakes or other natural events is small. The risk of potential fire hazards can be minimized during this extended period under the proposed compensatory measures by reducing or even eliminating certain maintenance activities on SSCs that impact fire protection systems.

3.4 Avoidance of High Risk Plant Configurations (Tier 2)

The licensee used its PRA to identify dominant contributing sequences and associated cutsets to the estimated increase in risk, as well as major contributing failures and human errors. Insights from the risk assessment were used in identifying the monitoring and compensatory measures to avoid plant configurations or conditions that may lead to significant risk increases during implementation of the proposed 24-hour AOT extension. The NRC staff finds that the proposed precautions, as well as their proposed implementation, are adequate for preventing plant configurations or conditions that may increase risk significantly.

3.5 Risk-Informed Configuration Risk Management (Tier 3)

The intent of the risk-informed configuration risk management is to ensure that plant safety is maintained and monitored during an extended outage. A formal commitment to maintain a configuration risk management program is required on the part of a utility prior to implementation of a risk-informed TS whenever such TS is entered and risk-significant components are taken out of service. The licensee has programs in place for D. C. Cook, Unit 1 to comply with 10 CFR 50.65(a)(4) to assess and manage risk from proposed maintenance activities. These programs can support the licensee's decisionmaking regarding the appropriate actions to control risk whenever a risk-informed TS is entered.

3.6 Unit 1 East CCP Reliability

The licensee stated that the reactor oversight process for the fourth quarter of 2004 indicates that the Unit 1 east CCP unavailability over the previous 12 quarters is 0.5 percent. The Unit 1 east CCP surveillance was last performed successfully on January 3, 2005.

There is no evidence of any event that would have caused or exacerbated a shaft crack condition on the Unit 1 east CCP since the U1C19 refueling outage. Clearance activities have

been reviewed for the 1 east CCP and it was found that the pump has not been drained to support maintenance since the last outage. The corrective action records for Unit 1 east CCP have been examined and no record of anomalous behavior has been identified. If air pockets were involved in the Unit 1 west CCP failure, they would have been swept through the system and are no longer present. This was confirmed by ultrasonic examination of the piping system which identified no air pockets in the highpoints of the system.

The pump rotating element currently installed in the Unit 1 east CCP and the element removed from the 1 west train were both installed in May of 2002. While the installed service life of these components is identical, a review of the material records for the shafts indicates that these parts were not procured from the same lot. Therefore, a possible manufacturing defect of the Unit 1 west CCP failed shaft would not be common to the rotating element currently installed in the Unit 1 east CCP.

The Unit 1 east CCP was evaluated and confirmed to be in good overall material condition based on review of outstanding work requests, corrective actions, system walk downs, predictive maintenance trends, and surveillance test results. The review of outstanding work requests identified no corrective maintenance job orders and only minor elective maintenance which has no impact on the safe reliable performance of the machine. None of the surveillance and predictive monitoring trends indicates degradation in performance.

3.7 Deterministic Evaluation

The licensee has proposed a one-time extension of the current 72-hour AOTs for the Unit 1 west CCP and ECCS subsystem. The AOTs would be extended by an additional 24 hours to allow completion of repair and testing of the Unit 1 west CCP.

The NRC staff evaluated the proposed amendment request and determined that extending the AOT for an additional 24 hours, on a one-time basis, to complete repair and testing of the Unit 1 west CCP is acceptable. The NRC staff's conclusion is based on the following:

- Causal analysis of the failure of the Unit 1 west CCP rotating element.

  The licensee states the possible failure modes of the rotating element include cracking or shear of the pump shaft, or stage-to-stage bypass. The apparent cause is supported by empirical data, external operating experience and vendor information. Therefore, the occurrence of failure of the Unit 1 west CCP pump shaft through these modes would not be common to the Unit 1 east CCP pump shaft. In addition, the shafts of the two pumps were not procured from the same lot. Therefore, a possible manufacturing defect of the Unit 1 west CCP failed shaft would not be common to the rotating element currently installed in the Unit 1 east CCP.

- Reliability of the Unit 1 East CCP

  The Unit 1 east CCP was evaluated and confirmed to be in good overall material condition based on a review of outstanding work requests, corrective actions, system walk downs, predictive maintenance trends, and surveillance test results. The licensee found no evidence of cracking or anomalous behavior in the performance of the Unit 1 east CCP. Surveillance on this pump was last performed successfully on January 3,

2005. None of the surveillance and predictive monitoring trends indicate degradation in performance.

- Operations and maintenance restrictions to minimize the risk of unit transients during the 24-hour AOT extension.

  The licensee states in its submittal that maintenance and testing during the AOT extension will be rescheduled for both units. For example, the licensee stated that no activities that can adversely impact the availability of essential plant equipment (including Unit 1 east CCP or shared safety systems) will be conducted during the extended AOT. Other compensatory measures to minimize risk of transients and to provide increased grid stability will also be taken.

3.8 Summary

The NRC staff has concluded that the proposed one-time extension of the AOT for the west CCP and ECCS subsystem is acceptable. This conclusion is based, in part, on the availability and reliability of the east CCP and the low likelihood of the loss of the east CCP during the 24-hour extended time period that the west CCP may remain out of service. In addition, the licensee has taken compensatory measures limiting activities that have the potential to result in a plant transient. Therefore, the NRC staff finds that there is no undue risk to public health and safety associated with granting the 24-hour AOT extension.

In finding the proposed AOT extension acceptable, the NRC staff did not consider the transient risk analysis presented by the licensee.

4.0 REGULATORY COMMITMENTS

The licensee stated in its application that it will implement the following compensatory measures during the 24-hour AOT extension:

> Maintenance and testing during the allowed outage time extension will be rescheduled for both units as warranted to minimize risk of unit transients. This will specifically include:
>
> > No work will be performed on shared safety significant systems (i.e., essential service water, nonessential service water, plant air compressors, motor driven auxiliary feed pumps, and chemical and volume control system), and their applicable supporting systems, that could render the system inoperable or unavailable. By limiting work on these systems and related equipment, they will remain available to provide either cross-unit support in case of a trip and subsequent failure on the affected unit, and/or assure that back-up capability exists to compensate for unexpected failures in shared systems (such as the plant air or nonessential service water system) such that a single failure in these systems will not result in a single or dual unit trip.
> >
> > No work is planned that could potentially jeopardize unit operation (e.g., condenser waterbox flushing, pump swaps, etc). This is not meant to prevent operator actions to switch equipment in response to any failures or extenuating

circumstances outside those considered that occur during the extended allowed outage time, including actions taken to de-ice. This provision is intended to eliminate any challenge to unit operation that might result from operational changes in plant alignment or switching operating equipment for elective reasons.

No surveillance testing on plant equipment will be performed that could jeopardize plant operation (e.g., starting or stopping pumps, stroking valves, taking instrument channels out of service, etc.) during the additional time the CCP is out of service. However, non-intrusive surveillance testing (e.g., rod position verification, instrument channel checks, leak rates, etc.) may be performed.

No biocide treatment, outside of continuous low-level chlorination, will be performed during the extended allowed outage time.

Manipulation of valve 12-WMO-30 (Circulating Water Intake Shut-off Valve) will be prohibited during the extended allowed outage time.

No switchyard work will be allowed.

No work on emergency diesel generators will be performed.

The essential service water screenhouse condition currently meets CNP's Level I status (least vulnerable). In accordance with plant procedural requirements, screen house vulnerability is evaluated daily based on equipment status, planned evolutions, plant operating mode, wind conditions, lake wave height, fish conditions, and traveling screen debris loading. During the allowed outage time extension:

No elective actions will be taken that would increase screen house vulnerabilities.

No heat sink alignment changes will be made with the exception of de-ice, if required. No elective changes in the alignment or operation of this equipment will be allowed.

Main condenser and feed pump condenser differential pressure will be monitored at a frequency commensurate with the screenhouse walkdowns. This is intended to provide added assurance that condensate and feed systems will not initiate a plant transient.

The integrity of the on-site power supplies, including the station batteries, will be maintained.

The following actions will be taken to provide increased assurance of grid stability:

No planned test or maintenance activities that could reduce switchyard reliability will be performed.

Periodically, the projected grid voltage following postulated unit trip will be verified to indicate a stable grid. Assuring that grid conditions remain stable serves to reduce the grid as an initiator for loss of offsite power to the units.

I&M will contact the system dispatcher to ensure that no short-term activities adversely affecting grid stability are planned or have transpired.

I&M will confirm that the system dispatcher will notify the control room or Shift Manager in the event system degradation or perturbations do occur so that an appropriate plant response can be determined.

I&M will contact the system dispatcher to ensure that no short-term activities adversely affecting the potential to over-duty 345 kV switchyard breakers are planned or have transpired.

Special Operations Start-of-the-Shift briefings will be conducted in each unit on use of the 69 kV emergency power backup in case of loss of offsite power or station blackout, and use of the chemical and volume control system unit cross tie. These briefings will include review of the associated procedures and initiating indications.

I&M will ensure the recovery of the Unit 1 west CCP is of the highest priority and will exit the proposed action following satisfactory completion of the final operability runs.

As stated in a telephone conversation between J. Zwolinski (I&M) and M. Kotzalas (NRC) on January 15, 2005, the above compensatory measures have been entered as regulatory commitments in the licensee's Commitment Management System which complies with Nuclear Energy Institute Document 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes." The NRC staff has reviewed the compensatory measures and how they will be controlled and finds that the licensee's commitments provide adequate assurance that safe plant operation will not be affected by the extended AOT for the Unit 1 west CCP.

5.0 EMERGENCY CIRCUMSTANCES

The NRC's regulations at 10 CFR 50.91 contain provisions for issuance of an amendment where the Commission finds that emergency circumstances exist, in that a licensee and the Commission must act quickly and that time does not permit the Commission to publish a *Federal Register* notice allowing 30 days for prior public comment. The emergency exists in this case in that the proposed amendment is needed to allow the licensee to preclude an unnecessary plant shutdown. The NRC staff has determined that the licensee used its best efforts to make a timely application and that the licensee could not reasonably have foreseen the problem that led to this license change request.

In its January 15, 2005, application, the licensee stated that the emergency situation resulted from the failure of the pump rotating element on the Unit 1 west CCP. Replacement of the internal assembly and testing the Unit 1 west CCP, or troubleshooting and repair of other deficiencies encountered, will exceed the 72 hours allowed by TSs 3.1.2.4 and 3.5.2, Action "a," which would require that the unit be shutdown. Neither a routine nor an exigent amendment can be processed within 72 hours. Therefore, the licensee requested an emergency amendment to preclude a shutdown.

The licensee stated that the failure of the Unit 1 west CCP rotating element was unexpected since there was no indication of problems with the pump prior to the night of the failure. The Unit 1 west CCP was previously operating without problems and was tested satisfactorily on

November 11, 2004. In addition, a vibration test performed on November 12, 2004, showed acceptable results. The failure of the Unit 1 west CCP could not have been avoided.

The licensee has determined that the risk of extending the 72-hour AOT by an additional 72 hours does not warrant subjecting the unit to a shutdown transient. Since the NRC staff could not process a routine or exigent license amendment within 72 hours, the licensee requested an emergency license amendment to preclude an unnecessary shutdown.

Accordingly, the Commission has determined that emergency circumstances exist pursuant to 10 CFR 50.91(a)(5) and could not have been avoided, that the submittal of information was timely, and that the licensee did not create the emergency condition.

6.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulation at 10 CFR 50.92(c) states that the Commission may make a final determination that a license amendment 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 or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) result in a significant reduction in a margin of safety. The NRC staff has made a final determination that no significant hazards consideration is involved for the proposed amendment and that the amendment should be issued as allowed by the criteria contained in 10 CFR 50.91. The NRC staff's final determination is presented below:

1. Does the proposed 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 proposed change is a one-time extension of the TS AOT for the Unit 1 west CCP that will allow continued operation of Unit 1 during repair and testing of the pump. The Unit 1 west CCP function is only mitigative and is not needed unless an accident occurs. The Unit 1 west CCP does not affect any accident initiators or precursors. The extension of the AOT does not affect the Unit 1 west CCP interaction with any system whose failure or malfunction can initiate an accident. Therefore, the probability of occurrence of an accident previously evaluated is not significantly increased.

Consequences of an Accident Previously Evaluated:

The CCP function is to mitigate a loss of coolant accident by supplying borated water to the reactor coolant system. The redundant train of CCP will mitigate the consequences of any accident. Therefore, the consequences of an accident previously evaluated are not significantly increased.

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

The proposed change allows operation of the unit to continue while the Unit 1 west CCP is repaired and tested. There are no new failure modes for the Unit 1 west CCP created and the

Unit1 west CCP is not an initiator of any new or different kind of accident. The proposed extension does not affect the interaction of the Unit 1 west CCP with any system whose failure or malfunction can initiate an accident. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

The margins of safety applicable to the proposed change are those associated with the availability of the Unit 1 west CCP to perform its mitigating function. The risk evaluation performed to support this amendment demonstrates that the slight decrease in availability is not significant. When the Unit 1 west CCP is returned to operation, there will be no reduction in the safety margins associated with its capacity. Therefore, the proposed change does not involve a significant reduction in margin of safety.

7.0 STATE CONSULTATION

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

8.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluent that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final finding that the amendment involves no significant hazards consideration. Accordingly, the amendment meets 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 amendment.

9.0 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: S. Wong
T. Scarbrough
F. Lyon

Date: January 16, 2005