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January 15, 2005

AEP:NRC:5591

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555-0001

**SUBJECT:** Donald C. Cook Nuclear Plant Unit 1  
Docket No. 50-315  
Emergency License Amendment Request for One-Time  
Extension of Allowed Outage Time for Inoperability of the  
Unit 1 West Centrifugal Charging Pump

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant Unit 1, proposes to amend Facility Operating License DPR-58. I&M proposes to add a license condition allowing a one-time extension of the allowed outage time for the Unit 1 West Centrifugal Charging Pump (CCP) and Emergency Core Cooling System subsystem. The extension would allow continued operation of the unit while repairs to the CCP are completed. The proposed amendment is being requested on an emergency basis pursuant to 10 CFR 50.91(a)(5).

On January 13, 2005, at 0130, the Unit 1 West CCP was declared inoperable and the 72 hour action requirements of technical specification (TS) 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 TS 3.1.2.4 and 3.5.2, Action "a." Accordingly, I&M is proposing a license amendment to extend the current 72 hour allowed outage time 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.

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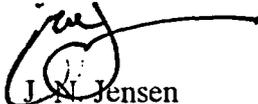
Enclosure 1 to this letter provides an affirmation affidavit pertaining to the proposed amendment. Enclosure 2 provides a detailed description and safety analysis to support the proposed amendment, including justification for approving the amendment on an emergency basis, an evaluation of significant hazards considerations pursuant to 10 CFR 50.92(c), and an environmental assessment.

I&M requests approval of the proposed amendment by 0130, January 16, 2005, to preclude a shutdown of the unit.

No previous submittals affect the license pages that are affected by this proposed amendment. If any future submittals affect these license pages, I&M will coordinate the changes to the pages with the U. S. Nuclear Regulatory Commission (NRC) Project Manager to ensure proper page control when the associated license amendment requests are approved.

This letter contains no new commitments. Should you have any questions, please contact Mr. John A. Zwolinski, Safety Assurance Director, at (269) 466-2428.

Sincerely,



J. N. Jensen  
Site Vice President

KS/rdw

Enclosures:

- 1 Affirmation
- 2 Application for Emergency License Amendment, One-Time Extension of Unit 1 West Centrifugal Charging Pump and Emergency Core Cooling System Technical Specification Allowed Outage Time

c: J. L. Caldwell – NRC Region III  
K. D. Curry – AEP Ft. Wayne, w/o enclosures  
J. T. King, MPSC, w/o enclosures  
C. F. Lyon – NRC Washington DC  
MDEQ – WHMD/HWRPS, w/o enclosures  
NRC Resident Inspector

Enclosure 1 to AEP:NRC:5591

**AFFIRMATION**

I, Joseph N. Jensen, being duly sworn, state that I am Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

Indiana Michigan Power Company



Joseph N. Jensen  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 15<sup>th</sup> DAY OF January, 2005

Begun D. Wendt  
Notary Public

My Commission Expires

REGISTRATION  
Notary Public License # 00000000  
My Commission Expires 01/01/08



**Enclosure 2 to AEP:NRC:5591**

**LICENSEE'S EVALUATION**

**Subject:** Application for Emergency License Amendment One-Time Extension of Unit 1 West Centrifugal Charging Pump and Emergency Core Cooling System Technical Specification Allowed Outage Time

1.0 DESCRIPTION

2.0 PROPOSED CHANGE

3.0 BACKGROUND

4.0 TECHNICAL ANALYSIS

5.0 REGULATORY SAFETY ANALYSIS

6.0 ENVIRONMENTAL CONSIDERATIONS

## 1.0 DESCRIPTION

Pursuant to 10 CFR 50.90, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Unit 1, proposes to amend Facility Operating License DPR-58. I&M proposes to add a license condition allowing a one-time extension of the allowed outage time 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 to the Unit 1 West CCP are completed. The proposed amendment is being requested on an emergency basis pursuant to 10 CFR 50.91(a)(5).

On January 13, 2005, at 0130, the Unit 1 West CCP was declared inoperable and the 72 hour action requirements of technical specification (TS) 3.1.2.4, "Charging Pumps – Operating," and 3.5.2, "ECCS Subsystems –  $T_{avg} \geq 350^{\circ}\text{F}$ ," 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 TS 3.1.2.4 and 3.5.2, Action "a." Accordingly, I&M is proposing a license amendment to extend the current 72 hour allowed outage time 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.

## 2.0 PROPOSED CHANGE

The proposed change would add a new License Condition to Section 2.C of the CNP Unit 1 Facility Operating License, License No. DPR-58. The proposed License Condition is 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."

## 3.0 BACKGROUND

### Description of Events

On January 13, 2005, at 0130, the Unit 1 West CCP was declared inoperable and the 72 hour action statements of TS 3.1.2.4 and 3.5.2, Action "a," were entered. During control room monitoring 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.

I&M has elected to replace the Unit 1 West CCP rotating assembly. The required installation and testing of the internal assembly will exceed the current 72-hour allowed outage time. Accordingly, I&M is proposing a license amendment to extend the current 72 hour allowed outage time by an additional 24 hours to allow completion of repair and testing of the Unit 1 West CCP. The proposed extension is limited to the current period of Unit 1 West CCP inoperability.

### Current Requirements

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.

### Basis for Current Requirements

#### TS 3.1.2.4

A minimum of two separate and redundant boron injection systems are provided to ensure single functional capability in the event an assumed failure renders one of the systems inoperable. Allowable out-of-service periods ensure that minor component repair or corrective action may be completed without undue risk to overall facility safety from injection system failures during the repair period.

#### TS 3.5.2

The operability requirements for two independent ECCS subsystems ensures that sufficient emergency core cooling capability will be available in the event of a loss of coolant accident assuming the loss of one subsystem due to a single failure. Either subsystem, operating in conjunction with the accumulators, is capable of supplying sufficient core cooling to limit the peak cladding temperatures within acceptable limits for all postulated break sizes up to a double ended break of the reactor coolant system cold leg pipe downward. In addition, each ECCS subsystem provides long-term core cooling capability in the recirculation mode during the accident recovery period.

### **Reason for Requesting Emergency Amendment**

Regulation 10 CFR 50.91(a)(5) states that where the U. S. Nuclear Regulatory Commission (NRC) finds that an emergency situation exists, in that failure to act in a timely way would result in derating or shutdown of a nuclear power plant, or in prevention of either resumption of operation, or of increase in power output up to the plant's licensed power level, it may issue a license amendment involving no significant hazards consideration without prior notice and opportunity for a hearing or for public comment. The regulation requires that a licensee requesting an emergency amendment explain why the emergency situation occurred and why the licensee could not avoid the situation. As explained below, an emergency amendment is needed to preclude an unnecessary plant shutdown, and I&M could not have reasonably avoided the situation or made timely application for an amendment.

### **Reason Emergency Situation Has Occurred**

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 TS 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, an emergency amendment is requested to preclude a shutdown.

### **Reason the Situation Could Not Have Been Avoided**

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.

I&M therefore considers that there is sufficient justification for requesting the proposed license amendment on an emergency basis.

## **4.0 TECHNICAL ANALYSIS**

The proposed amendment to allow a one-time extension of the allowed outage times for the Unit 1 West CCP and ECCS subsystem is based on Unit 1 West CCP causal analysis, risk considerations, operation and maintenance restrictions, and reliability of the Unit 1 East CCP.

### **Unit 1 West CCP Inoperability**

The low flow condition of the Unit 1 West CCP resulted from a failure of the pump rotating element. The possible failure modes of the rotating element include:

- Cracking or shear of the pump shaft
- Stage to stage by-pass.

Replacement of the rotating element eliminates both of the above possible failures.

The above apparent cause is supported by empirical data obtained during the current investigation, external operating experience, and vendor input.

The failure investigation team has refuted the following considered causes:

- Motor failure
- Speed increaser failure
- Pump misalignment
- Operational error
- 4 kilovolt (kV) power supply malfunction
- Gas binding at the time of failure
- Mechanical seal failure.

Specifically, the mechanical seals could not have caused the low flow condition. There was no evidence of seal failure causing flow diversion from the system. Nor is there indication of seal failure that caused binding and subsequent reduced flow.

The pump rotating element being installed in Unit 1 West was installed previously in the Unit 2 West CCP. This rotating element had been installed in June of 2003 in the Unit 2 West CCP and operated for 1 fuel cycle. The shaft on this rotating element was new when installed in 2003. This rotating element has not been refurbished since removal from Unit 2 West CCP in October of 2004.

### **Risk Considerations**

I&M has evaluated the risk implications of the proposed amendment. The risk assessment was performed assuming a 72 hour allowed outage time extension. Therefore, the 24 hour extension in the allowed outage time is bounded by the risk assessment.

### **Risk From Proposed Allowed Outage Time Extension**

A quantitative probabilistic risk analysis (PRA) for the proposed Unit 1 W CCP allowed outage time extension was performed for the controlled conditions that will exist during the extended allowed outage time. The overall impact/change in annual core damage frequency and large early release frequency (CDF and LERF) was estimated using the following steps:

- Evaluate plant risk with 362 days assuming the normal average maintenance and the associated nominal CDF/LERF plus three days with plant activity limitations described

below (e.g., no plant testing or maintenance and additional limitations on switchyard activity) with the exception of the unavailable charging pump.

- Compare this result to nominal CDF and LERF to obtain the associated delta CDF and LERF values for the condition.
- Also compare this result to the zero-maintenance CDF and LERF to obtain the associated Incremental Conditional Core Damage Probability (ICCDP) and Incremental Conditional Large Early Release Probability (ICLERP) values for the condition.

The evaluation determined that the risk associated with maintaining either unit at power for an additional 72 hours beyond the present TS allowed outage time with the Unit 1 West CCP unavailable falls within the available regulatory guidance. Following Regulatory Guide 1.177, Section 2.4, and Regulatory Guide 1.174, Section 2.24 guidance, I&M has concluded that the one-time, single CCP TS allowed outage time change has a negligible quantitative impact on plant risk.

The evaluation was performed using the updated 2003 version of the CNP average PRA model. This model revision resolves the WOG Peer Review Level A&B Findings and Observations (except for the Internal Flooding Finding and Observation). The evaluation used the average PRA model results as the “base case” for the PRA assessment. The evaluation also included PRA model runs that assumed that no equipment was out-of-service for test and maintenance (i.e., a “zero-maintenance” case), as well as a case that assumed that the Unit 1 West CCP was not available, but that no other equipment affecting risk was considered out of service or unavailable. The evaluation also included appropriate changes to reflect the current plant configuration; specifically, in addition to the assumption that the Unit 1 West CCP is out-of-service and non-recoverable, block valves for two power operated relief valves are assumed closed, and the unfavorable exposure time corresponding to the current time in core life is assumed to apply.

The changes in CDF and LERF were determined using the following equations:

$$\Delta\text{CDF} = \text{CDF}_{\text{new}} - \text{CDF}_{\text{ave}}$$

where

$$\text{CDF}_{\text{new}} = \text{CDF}_{\text{inst}} (3 \text{ days} / 365 \text{ days}) + \text{CDF}_{\text{ave}} (362 \text{ days} / 365 \text{ days})$$

$$\text{CDF}_{\text{ave}} = \text{the Unit 1 "base case" average maintenance CDF value} = 4.28\text{E-}05 / \text{year}$$

$$\text{CDF}_{\text{inst}} = \text{the Unit 1 CDF value when only the 1 West CCP is unavailable and the operation and maintenance restrictions described below are in place} = 4.80\text{E-}05 / \text{year}$$

$$\Delta\text{LERF} = \text{LERF}_{\text{new}} - \text{LERF}_{\text{ave}}$$

where

$$\text{LERF}_{\text{new}} = \text{LERF}_{\text{inst}} (3 \text{ days} / 365 \text{ days}) + \text{LERF}_{\text{ave}} (362 \text{ days} / 365 \text{ days})$$

$\text{LERF}_{\text{ave}}$  = the Unit 1 "base case" average maintenance LERF value = 6.89E-06/year

$\text{LERF}_{\text{inst}}$  = the Unit 1 LERF value when only the 1 West CCP is unavailable and the operation and maintenance restrictions described below are in place = 6.55E-06 / year

Estimated values for ICCDP and ICLERP associated with the proposed amendment were determined using the following equations:

$$\text{ICCDP} = (\text{CDF}_{\text{inst}} - \text{CDF}_{\text{zm}}) * (3 \text{ days} / 365 \text{ days} / \text{year})$$

where

$\text{CDF}_{\text{zm}}$  = the Unit 1 "zero-maintenance" CDF value of 4.01E-05 / year

$$\text{ICLERP} = (\text{LERF}_{\text{inst}} - \text{LERF}_{\text{zm}}) * (3 \text{ days} / 365 \text{ days} / \text{year})$$

where

$\text{LERF}_{\text{zm}}$  = the Unit 1 "zero-maintenance" LERF value of 6.34E-06 / year

Using the 2003 average PRA model and equations as described above, extending the Unit 1 West CCP unavailability period by 3 days was determined to yield the following results:

$\Delta\text{CDF}$  equals 4.3 E-08 per year

$\Delta\text{LERF}$  is 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 charging pump outage

ICCDP equals 6.5 E-08

ICLERP equals 1.7 E-09

### Transition Risk

I&M has made a comparison of the risk of transitioning to a shut down condition, to the increase in risk of continued operation. Averting this transition risk should be considered when evaluating the overall risk of continued operation while performing the charging pump maintenance

activities. The transition risk considered is that associated with a reactor trip that could occur during a controlled shutdown. This risk was characterized by the conditional core damage probability (CCDP) and conditional large early release probability (CLERP) for such an occurrence. The averted CCDP (CLERP) value was determined as the product of the CCDP (CLERP) for a reactor trip initiating event and the probability that such a trip might occur during a power transient.

The CCDP (CLERP) associated with a reactor trip that could occur during a controlled shutdown was calculated as follows:

- The CDF from transients with power conversion available was divided by the transient event frequency.
- The LERF from transients with power conversion available was divided by the transient event frequency.
- These probabilities were then multiplied by the conditional probability of a reactor trip occurring during power maneuvering.

The probability of a reactor trip during power maneuvering was estimated based on CNP-specific data from 1990 through July 2003. The resulting CCDP and CLERP values are approximately  $1.3 \text{ E-}08$  and  $1.7 \text{ E-}09$ , respectively. These values represent the risk that is avoided by completing the CCP repair with the unit at power.

### **Operation and Maintenance Restrictions**

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 are expected to 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.

### **Unit 1 East CCP Reliability**

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 Pump have been examined and no record of anomalous behavior has been identified. If air pockets were involved in the Unit 1 West 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.

## 5.0 REGULATORY SAFETY ANALYSIS

### No Significant Hazards Consideration

Indiana Michigan Power Company (I&M) has evaluated whether or not a significant hazards consideration is involved with the proposed change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated?

Response: No

#### *Probability of Occurrence of an Accident Previously Evaluated*

The proposed change is a one-time extension of the technical specification (TS) allowed outage time for the Unit 1 West centrifugal charging pump (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 allowed outage time 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?

Response: No

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 Unit 1 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?

Response: No

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.

In summary, based upon the above evaluation, I&M has concluded that the proposed change involves no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

## **6.0 ENVIRONMENTAL CONSIDERATIONS**

I&M has evaluated this license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. I&M has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared concerning the proposed amendment.