

May 17, 2005

MEMORANDUM TO: File

FROM: Jack N. Donohew, Senior Project Manager **/RA/**
Project Directorate IV-2
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: INFORMATION PROVIDED IN E-MAIL DATED APRIL 20, 2005, FOR
DONALD C. COOK NUCLEAR PLANT FOR THE ITS CONVERSION
AMENDMENTS (TAC NOS. MC2629 AND MC2630)

The Nuclear Regulatory Commission (NRC) has been reviewing the license amendment request dated April 6, 2004, submitted by Indiana Michigan Power (the licensee) to convert the current Technical Specifications to the improved Technical Specifications (ITSs) for the Donald C. Cook Nuclear Plant, Units 1 and 2 (CNP).

The NRC staff issued its draft Final Safety Evaluation (SE) for the ITS conversion amendments in its letter dated March 31, 2005. In the attached e-mail dated April 20, 2005, the licensee provided comments on the draft Final SE. In the conference call of May 11, 2005, the licensee stated that it was acceptable to place the e-mail information on the CNP dockets.

The comments provided by the licensee were incorporated into the license amendment SE and tables.

Docket Nos. 50-315 and 50-316

Attachment: E-mail Dated April 20, 2005

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E-MAIL DATED APRIL 20, 2005

From: <gewadkins@aep.com>
To: <jnd@nrc.gov>
Date: 4/20/05 2:03PM
Subject: Comments on Draft Final SE DOC Tables

Jack,

Here are my final comments on the draft Final SE Tables:

1. Table A - Administrative Changes, for ITS Section 3.3, ITS 3.3.2 DOC A.7 has been removed (in error I presume), and does not appear to be in any of the DOC tables.

2. In Table A - Administrative Changes, for ITS Section 3.3, several of the original ?A? DOCS have been recategorized as ?M? DOCS and moved to the M DOC Table as new items by **** *. As a result of this change and removal of the ITS 3.3.2 DOC A.7, all of the ITS 3.3.2 ?A? DOCS from ITS 3.3.2 DOC A.7 on were renumbered differently than our submittals. To avoid confusion, and to ensure the SE is consistent with our Revision 1 submittal, I would recommend that you leave the original ITS ?A? DOC numbers as is, and if deliberately eliminating a DOC place ?Not used.? in the Description of Change column, and for those DOCS moved place a statement in the Description of Change column that says something like ?This change has been recategorized as ITS 3.3.2 DOC M.xx.? The DOCS that I have discovered to be moved include the following:

Our ITS 3.3.2 DOC A.8 has been recategorized by NRC as new ITS 3.3.2 DOC M.13

Our ITS 3.3.2 DOC A.9 has been recategorized by NRC as new ITS 3.3.2 DOC M.14

Our ITS 3.3.2 DOC A.12 has been recategorized by NRC as new ITS 3.3.2 DOC M.15

Our ITS 3.3.2 DOC A.13 has been recategorized by NRC as new ITS 3.3.2 DOC M.16

3. In Table A - Administrative Changes, for ITS Section 3.3, ITS 3.3.6 DOC A.1 is missing the CTS requirements column information.

4. In Table A - Administrative Changes, for ITS Section 3.8, a new ITS 3.8.1 DOC A.13 from our submittal is required to be added to the draft Final SE table.

5. In Table A - Administrative Changes, for ITS Chapter 5.0, ITS 5.6 DOC A.6 needs to be revised consistent with our submittals, specifically to

add references to adding the appropriate analytical method for the Overtemperature DeltaT and Overpower DeltaT Allowable Value parameter values. This was the last, late-breaking change that we discussed several weeks ago related to a WCAP SER condition that we inadvertently forgot to meet (and was not caught by the NRC reviewer).

6. In Table M - More Restrictive Changes, for ITS Section 3.3, ITS 3.3.2 DOC M.13 (appears as ITS 3.3.2 DOC A.8 in our submittals as discussed in comment 2 above) needs to be revised consistent with our submittals, specifically to eliminate the discussions associated with ITS 3.3.2 DOC L.16 (which has been revised to "Not used." in our submittal as well in your draft Final SE table).

7. In Table M - More Restrictive Changes, for ITS Section 3.4, ITS 3.4.12 M.3 appears twice. The second ITS 3.4.12 DOC M.3 should be ITS 3.4.12 DOC M.4 (designated as "Not used.").

8. In Table M - More Restrictive Changes, for ITS Section 3.8, ITS 3.8.1 DOC M.10 should reference "SR 3.8.1.22" (not "SR 3.8.1.20").

9. In Table L - Less Restrictive Changes, for ITS Section 3.3, ITS 3.3.2 DOC L.21 should be changed to "Not used." This item has been deleted in our submittals.

10. In Table LA - Removed Details, for ITS Section 3.4, ITS 3.4.12 DOC LA.1 should be changed to delete the entries in the last 3 columns (item should be designated as "Not used.").

11. In Table LA - Removed Details, for ITS Section 3.5, ITS 3.5.5 DOC LA.1 needs to be revised consistent with our submittals, specifically to change the pressure values.

12. In Table R - Relocated Specifications, ITS Section 3.2 is missing (should be a single "NONE" entry).

13. There appear to be a number of word-processing problems with symbols. For example, the "copyright" sign (i.e., a "c" in the middle of a circle) appears for "(c)" in several places (e.g., ITS 3.3.1 DOC A.8, ITS 3.3.2 DOC A.2, ITS 3.3.2 DOC M.1); and other symbols such as the "greater than or equal to", "less than or equal to", "degrees", "delta", etc. do not appear correctly (e.g., ITS 3.5.1 DOC A.4).

There are no other comments at this time, and I have finished the amount of review that we were going to perform. Any questions, just call.