



**INDIANA  
MICHIGAN  
POWER**

A unit of American Electric Power

Indiana Michigan Power  
Cook Nuclear Plant  
One Cook Place  
Bridgman, MI 49106  
AEP.com

July 5, 2005

AEP:NRC:5901-04

Docket Nos. 50-315  
50-316

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

Donald C. Cook Nuclear Plant, Units 1 and 2  
CORRECTION OF ADMINISTRATIVE ERROR FOR  
IMPROVED TECHNICAL SPECIFICATIONS  
(TAC NOS. MC2629, MC2630, MC2653 THROUGH MC2687,  
MC2690 THROUGH MC2695, MC3152 THROUGH MC3157,  
MC3432 THROUGH MC3453)

Reference: Letter from J. Donohew, Nuclear Regulatory Commission, to M. K. Nazar, Indiana Michigan Power Company, "D. C. Cook Nuclear Plant, Units 1 and 2 - Issuance of Amendments for the Conversion to the Improved Technical Specifications with Beyond Scope Issues (TAC Nos. MC2629, MC2630, MC2653 through MC2687, MC2690 through MC2695, MC3152 through MC3157, MC3432 through MC3453)," dated June 1, 2005.

Dear Sir or Madam:

By Reference 1, the U. S. Nuclear Regulatory Commission (NRC) issued Amendment Nos. 287 and 269 to Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2 Facility Operating License Nos. DPR-58 and DPR-74, respectively. These amendments approved the conversion of the CNP Unit 1 and Unit 2 current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) consistent with Improved Standard Technical Specifications as described in NUREG-1431, "Standard Technical Specifications – Westinghouse Plants," Revision 2.

While preparing to implement these amendments, Indiana Michigan Power Company (I&M) has identified an administrative error in both CNP Unit 1 and Unit 2 Technical Specification 3.3.1. Specifically, on both CNP Unit 1 and Unit 2 Technical Specification pages 3.3.1-16, the inequality associated with the  $\tau_3$  time constant should be " $\geq$ " instead of " $\leq$ ." In the CNP Unit 1 and Unit 2 CTS, the  $\tau_3$  time constant (utilized in the rate lag controller for  $T_{avg}$ ) is the same as the  $\tau_7$  time constant in NUREG-1431. In converting to the ITS, I&M inadvertently adopted the " $\leq$ " inequality sign of the NUREG-1431  $\tau_3$  time constant (utilized in the lag compensator for  $\Delta T$ , which is not applicable for the CNP design), instead of the " $\geq$ " inequality sign of the equivalent NUREG-1431  $\tau_7$  time constant.

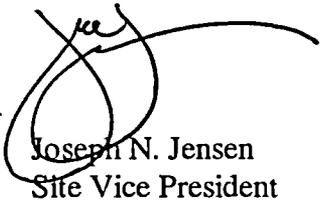
A001

Therefore, I&M requests that the NRC issue revised pages to Amendment Nos. 287 and 269 to CNP Unit 1 and Unit 2 Facility Operating License Nos. DPR-58 and DPR-74, respectively, to correct this administrative error. Attachment 1 contains the original CNP Unit 1 and Unit 2 Technical Specification pages provided in Reference 1 marked to show correction of this administrative error, and Attachment 2 contains final corrected CNP Unit 1 and Unit 2 Technical Specification pages with the proposed changes incorporated for issuance by the NRC. In order to support timely implementation of these amendments, I&M requests NRC issuance of the revised pages by August 4, 2005.

Enclosure 1, "Affirmation," provides an oath and affirmation affidavit regarding the statements made and matters set forth in this submittal.

This letter contains no commitments. If you have any questions or require additional information, please contact Mr. Michael K. Scarpello, Regulatory Affairs Supervisor, at (269) 466-2649.

Sincerely,



Joseph N. Jensen  
Site Vice President

GW/rdw

Enclosure:

1. Affirmation

Attachments:

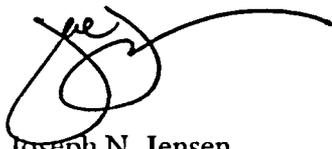
1. CNP Unit 1 and Unit 2 Technical Specification Pages Marked to Show Changes
2. CNP Unit 1 and Unit 2 Technical Specification Pages with the Proposed Changes Incorporated

c: T. H. Boyce, NRC Washington, DC  
J. L. Caldwell, NRC Region III  
K. D. Curry, Ft. Wayne AEP, w/o enclosure/attachments  
J. N. Donohew, NRC Washington, DC  
P. C. Hearn, NRC Washington, DC  
J. T. King, MPSC, w/o enclosure/attachments  
C. F. Lyon - NRC Washington, DC  
MDEQ - WHMD/RPMWS, w/o enclosure/attachments  
NRC Resident Inspector

**AFFIRMATION**

I, Joseph N. Jensen, being duly sworn, state that I am Site 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.

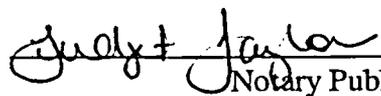
Indiana Michigan Power Company



Joseph N. Jensen  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 5<sup>th</sup> DAY OF July, 2005

  
\_\_\_\_\_  
Notary Public

My Commission Expires 6/10/2007



Attachment 1 to AEP:NRC:5901-04

CNP UNIT 1 AND UNIT 2 TECHNICAL SPECIFICATION PAGES  
MARKED TO SHOW CHANGES

Pages Affected

Unit 1: 3.3.1-16

Unit 2: 3.3.1-16

Table 3.3.1-1 (page 6 of 6)  
Reactor Trip System Instrumentation

Note 2: Overpower  $\Delta T$

The Overpower  $\Delta T$  Function Allowable Value shall not exceed the following nominal Trip Setpoint by more than 0.038% of  $\Delta T$  span.

$$\Delta T \leq \Delta T_o \left\{ K_4 - K_5 \frac{\tau_3 S}{1 + \tau_3 S} T - K_6 [T - T''] - f_2(\Delta I) \right\}$$

Where:  $\Delta T$  is measured RCS  $\Delta T$ , °F.  
 $\Delta T_o$  is the indicated  $\Delta T$  at RTP, °F.  
 $S$  is the Laplace transform operator,  $\text{sec}^{-1}$ .  
 $T$  is the measured RCS average temperature, °F.  
 $T''$  is the nominal  $T_{\text{avg}}$  at RTP,  $\leq$  [\*]°F.

$K_4 \leq$ [*]	$K_5 \geq$ [*]/°F for increasing $T_{\text{avg}}$ [*]/°F for decreasing $T_{\text{avg}}$	$K_6 \geq$ [*]/°F when $T > T''$ [*]/°F when $T \leq T''$
$\tau_3 \leq$ [*] sec		
$f_2(\Delta I) =$ [*]		

\*These values denoted with [\*] are specified in the COLR.

Table 3.3.1-1 (page 6 of 6)  
Reactor Trip System Instrumentation

Note 2: Overpower  $\Delta T$

The Overpower  $\Delta T$  Function Allowable Value shall not exceed the following nominal Trip Setpoint by more than 0.037% of  $\Delta T$  span.

$$\Delta T \leq \Delta T_o \left\{ K_4 - K_5 \frac{\tau_3 S}{1 + \tau_3 S} T - K_6 [T - T''] - f_2(\Delta I) \right\}$$

Where:  $\Delta T$  is measured RCS  $\Delta T$ , °F.  
 $\Delta T_o$  is the indicated  $\Delta T$  at RTP, °F.  
 $S$  is the Laplace transform operator,  $\text{sec}^{-1}$ .  
 $T$  is the measured RCS average temperature, °F.  
 $T''$  is the nominal  $T_{\text{avg}}$  at RTP,  $\leq$  [\*]°F.

$K_4 \leq$  [\*]

$K_5 \geq$  [\*]/°F for increasing  $T_{\text{avg}}$   
 [\*]/°F for decreasing  $T_{\text{avg}}$

$K_6 \geq$  [\*]/°F when  $T > T''$   
 [\*]/°F when  $T \leq T''$

$\tau_3 \leq$  [\*] sec

$f_2(\Delta I) =$  [\*]

\*These values denoted with [\*] are specified in the COLR.

Attachment 2 to AEP:NRC:5901-01

CNP UNIT 1 AND UNIT 2 TECHNICAL SPECIFICATION PAGES  
WITH THE PROPOSED CHANGES INCORPORATED

Pages Affected

Unit 1: 3.3.1-16

Unit 2: 3.3.1-16

Table 3.3.1-1 (page 6 of 6)  
Reactor Trip System Instrumentation

Note 2: Overpower  $\Delta T$

The Overpower  $\Delta T$  Function Allowable Value shall not exceed the following nominal Trip Setpoint by more than 0.037% of  $\Delta T$  span.

$$\Delta T \leq \Delta T_o \left\{ K_4 - K_5 \frac{\tau_3 S}{1 + \tau_3 S} T - K_6 [T - T''] - f_2(\Delta I) \right\}$$

Where:  $\Delta T$  is measured RCS  $\Delta T$ , °F.  
 $\Delta T_o$  is the indicated  $\Delta T$  at RTP, °F.  
 $S$  is the Laplace transform operator,  $\text{sec}^{-1}$ .  
 $T$  is the measured RCS average temperature, °F.  
 $T''$  is the nominal  $T_{\text{avg}}$  at RTP,  $\leq [^{\circ}\text{F}]$ .

$K_4 \leq [^{\circ}\text{F}]$	$K_5 \geq [^{\circ}\text{F}] / ^{\circ}\text{F}$ for increasing $T_{\text{avg}}$ $[^{\circ}\text{F}] / ^{\circ}\text{F}$ for decreasing $T_{\text{avg}}$	$K_6 \geq [^{\circ}\text{F}] / ^{\circ}\text{F}$ when $T > T''$ $[^{\circ}\text{F}] / ^{\circ}\text{F}$ when $T \leq T''$
$\tau_3 \geq [^{\circ}\text{F}] \text{ sec}$		
$f_2(\Delta I) = [^{\circ}\text{F}]$		

\*These values denoted with [ $^{\circ}$ ] are specified in the COLR.

Table 3.3.1-1 (page 6 of 6)  
Reactor Trip System Instrumentation

Note 2: Overpower  $\Delta T$

The Overpower  $\Delta T$  Function Allowable Value shall not exceed the following nominal Trip Setpoint by more than 0.037% of  $\Delta T$  span.

$$\Delta T \leq \Delta T_o \left\{ K_4 - K_5 \frac{\tau_3 S}{1 + \tau_3 S} T - K_6 [T - T''] - f_2(\Delta I) \right\}$$

Where:  $\Delta T$  is measured RCS  $\Delta T$ , °F.  
 $\Delta T_o$  is the indicated  $\Delta T$  at RTP, °F.  
 $S$  is the Laplace transform operator,  $\text{sec}^{-1}$ .  
 $T$  is the measured RCS average temperature, °F.  
 $T''$  is the nominal  $T_{\text{avg}}$  at RTP,  $\leq [^{\circ}\text{F}]$ .

$$K_4 \leq [^{\circ}\text{F}]$$

$$K_5 \geq [^{\circ}\text{F}] / ^{\circ}\text{F} \text{ for increasing } T_{\text{avg}} \\ [^{\circ}\text{F}] / ^{\circ}\text{F} \text{ for decreasing } T_{\text{avg}}$$

$$K_6 \geq [^{\circ}\text{F}] / ^{\circ}\text{F} \text{ when } T > T'' \\ [^{\circ}\text{F}] / ^{\circ}\text{F} \text{ when } T \leq T''$$

$$\tau_3 \geq [^{\circ}\text{F}] \text{ sec}$$

$$f_2(\Delta I) = [^{\circ}\text{F}]$$

\*These values denoted with [\*] are specified in the COLR.