



**INDIANA  
MICHIGAN  
POWER**

*A unit of American Electric Power*

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

July 29, 2005

AEP:NRC:5090  
10 CFR 50.90

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

**Subject:** Donald C. Cook Nuclear Plant Units 1 and 2  
Docket Nos. 50-315 and 50-316  
Application for Technical Specification Improvement to Eliminate Requirements to  
Provide Monthly Operating Reports and Occupational Radiation Exposure Reports

**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),"  
Accession Number ML050620034, dated June 1, 2005.

Dear Sir or Madam:

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations, Indiana Michigan Power Company (I&M), the licensee for the Donald C. Cook Nuclear Plant (CNP), Units 1 and 2, is submitting a request for an amendment to the technical specifications (TS).

The proposed amendment would delete the TS requirements to submit monthly operating reports and occupational radiation exposure reports. The change is consistent with Nuclear Regulatory Commission (NRC)-approved Revision 1 to Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process.

By the referenced letter, the NRC approved the conversion of the CNP Current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) specified in NUREG-1431, "Standard Technical Specifications – Westinghouse Plants," Revision 2. However, the ITS have not yet been implemented. I&M has therefore provided copies of both the CTS and the current draft ITS

A001  
IE24  
IES6

pages that are affected by this proposed amendment. I&M will coordinate with the NRC Project Manager to ensure that the appropriate pages are issued.

The enclosure to this letter provides an affirmation pertaining to the statements made in this correspondence. Attachment 1 provides a description of the proposed change and confirmation of applicability. Attachments 2a and 2b provide the Unit 1 and Unit 2 CTS pages marked to show the proposed changes. Attachments 3a and 3b provide the Unit 1 and Unit 2 ITS pages marked to show the proposed changes. Attachments 4a and 4b provide the proposed Unit 1 and Unit 2 CTS pages. Attachments 5a and 5b provide the proposed Unit 1 and Unit 2 ITS pages. Attachment 6 provides I&M's regulatory commitment to provide operating data to the NRC using an industry database. I&M requests NRC review and approval in accordance with normal NRC review schedules for this type of request. I&M requests a 45-day implementation period following approval.

Should you have any questions, please contact Mr. John A. Zwolinski, Safety Assurance Director at (269) 466-2428.

Sincerely,



Joseph N. Jensen  
Site Vice President

RGV/rdw

Enclosure: Affirmation

Attachments:

1. Description and Assessment
- 2a. Unit 1 Current Technical Specification Pages Marked to Show Proposed Changes
- 2b. Unit 2 Current Technical Specification Pages Marked to Show Proposed Changes
- 3a. Unit 1 Improved Technical Specification Pages Marked to Show Proposed Changes
- 3b. Unit 2 Improved Technical Specification Pages Marked to Show Proposed Changes
- 4a. Unit 1 Proposed Current Technical Specification Pages
- 4b. Unit 2 Proposed Current Technical Specification Pages
- 5a. Unit 1 Proposed Improved Technical Specification Pages
- 5b. Unit 2 Proposed Improved Technical Specification Pages
6. Commitment

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

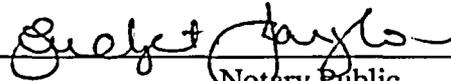
Indiana Michigan Power Company



Joseph N. Jensen  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 29<sup>th</sup> DAY OF July, 2005

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

My Commission Expires 6/10/2007



Attachment 1 to AEP:NRC:5090

Description and Assessment

1.0 INTRODUCTION

In Reference 1, the Nuclear Regulatory Commission (NRC) approved the conversion of the Donald C. Cook Nuclear Plant (CNP) Current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) specified in NUREG-1431, "Standard Technical Specifications – Westinghouse Plants," Revision 2. However, the ITS have not yet been implemented. Indiana Michigan Power Company (I&M) has therefore provided copies of both the CTS and the current draft ITS pages that are affected by this proposed amendment.

The proposed license amendment deletes the requirements in Unit 1 and Unit 2 CTS 6.9.1.5.a for an annual report on occupational radiation exposures and Unit 1 and Unit 2 CTS 6.9.1.8 for a monthly report of operating statistics and shutdown experience. The corresponding ITS requirements are 5.6.1 and 5.6.4.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specification (TS) improvement was announced in Reference 2 as part of the consolidated line item improvement process (CLIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

CTS 6.9.1.5.a (ITS 5.6.1) Occupational Radiation Exposure Report Deleted

CTS 6.9.1.8 (ITS 5.6.4) Monthly Operating Reports Deleted

As addressed in the safety evaluation (SE) published in the Notice of Availability for TSTF-369, I&M is proposing to adopt a part of NRC-approved Revision 4 to TSTF-258, "Changes to Section 5.0, Administrative Controls." Specifically, CTS 6.9.1.8 includes a requirement to include in the monthly operating reports any challenges to pressurizer power operated relief valves or pressurizer safety valves (ITS 5.6.4 does not have this provision). The NRC model safety evaluation addressed the removal of requirements to submit monthly operating reports in those cases where the TS includes a requirement to address challenges to relief and safety valves (i.e., if a licensee had not yet adopted the associated part of TSTF-258). The proposed change is consistent with the option described in the Reference 2 Notice of Availability, and the related documentation for both TSTF-369 and the limited portion of TSTF-258 included in this application.

### 3.0 BACKGROUND

The background for this application is adequately addressed by the Reference 2 Notice of Availability and TSTF-369.

### 4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the Reference 2 Notice of Availability and TSTF-369.

### 5.0 TECHNICAL ANALYSIS

I&M has reviewed the Reference 2 SE as part of the CLIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. I&M has concluded that the justifications presented in the TSTF proposal and the SE prepared by NRC staff are applicable to CNP, Units 1 and 2 and justify this amendment for the incorporation of the changes to the CNP technical specifications.

### 6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the Reference 2 Notice of Availability and TSTF-369.

#### 6.1 VERIFICATION AND COMMITMENT

As discussed in the model Reference 2 SE for TS improvement, I&M is making the following regulatory commitment:

Using an industry database, I&M will provide the NRC the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The commitment is based on the use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).

CNP does not have different reactor types or both operating and shutdown reactors. Thus, no commitment regarding apportionment of station doses between different reactor types or between operating and shutdown units is required.

## 7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

I&M has reviewed the Reference 2 proposed no significant hazards consideration determination as part of the CLIIP. I&M has concluded that the proposed determination presented in the notice is applicable to CNP and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

## 8.0 ENVIRONMENTAL EVALUATION

I&M has reviewed the environmental evaluation included in the Reference 2 model SE as part of the CLIIP. I&M has concluded that the NRC staff's findings presented in that evaluation are applicable to CNP and the evaluation is hereby incorporated by reference for this application.

## 9.0 PRECEDENTS

This application is being made in accordance with the CLIIP. I&M is not proposing variations or deviations from the TS changes described in TSTF-369 and the limited portion of TSTF-258 or the Reference 2 model SE.

Similar amendments have previously been approved for Brunswick Units 1 and 2, Reference 3, and Crystal River Unit 3, Reference 4.

## 10. REFERENCES

1. 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)," Accession Number ML050620034, dated June 1, 2005.
2. Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).
3. Letter from Brenda L. Mozafari, NRC, to C. J. Gannon, Brunswick Steam Electric Plant, "Brunswick Steam Electric Plant, Units 1 and 2 – Issuance of Amendments on Elimination of Requirements to Provide Monthly Operating Reports and Annual Occupational Radiation Exposure Reports (TAC Nos. MC5125 and MC5126)," dated April 19, 2005.

4. Letter from Brenda L. Mozafari, NRC, to Dale E. Young, Crystal River Nuclear Plant, "Crystal River Unit 3 – Issuance of Amendment on Elimination of Requirements to Provide Monthly Operating Reports and Annual Occupational Radiation Exposure Reports (TAC No. MC5127)," dated April, 19 2005.

Attachment 2a to AEP:NRC:5090

Unit 1 Current Technical Specification Pages Marked to  
Show Proposed Changes

Revised Pages

Unit 1

6-10

6-12

## 6.0 ADMINISTRATIVE CONTROLS

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### 6.9 STARTUP REPORT (Continued)

- 6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

### ANNUAL REPORTS<sup>1</sup>

- 6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

- 6.9.1.5 Reports required on an annual basis shall include:

- a. ~~A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving annual exposures greater than 100 mrem according to work and job functions<sup>2</sup>, e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance (describe maintenance), waste processing and refueling. Also included is a tabulation of the total person-rem exposures for station, utility, and other personnel associated with each work and job function. The dose assignment to various duty functions may be estimates based on pocket dosimeter, electronic dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose received shall be assigned to specific major work functions. DELETED<sup>2</sup>~~
- b. The complete results of steam generator tube in-service inspections performed during the report period (reference Specification 4.4.5.5.b).
- c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.
- d. Information regarding any instances when the I-131 specific activity limit was exceeded.

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<sup>1</sup> A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

<sup>2</sup> This tabulation supplements the requirements of 20.2206 of 10 CFR Part 20. DELETED

## 6.0 ADMINISTRATIVE CONTROLS

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### MONTHLY REACTOR OPERATING REPORT

- 6.9.1.8 ~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission (Attn: Document Control Desk), Washington, D.C. 20555, with a copy to the Regional Office no later than the 15th of each month following the calendar month covered by the report.~~ DELETED

### CORE OPERATING LIMITS REPORT

- 6.9.1.9.1 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:
- a. Moderator Temperature Coefficient Limits for Specification 3/4.1.1.4,
  - b. Rod Drop Time Limits for Specification 3/4.1.3.3,
  - c. Shutdown Rod Insertion Limits for Specification 3/4.1.3.4,
  - d. Control Rod Insertion Limits for Specification 3/4.1.3.5,
  - e. Axial Flux Difference for Specification 3/4.2.1,
  - f. Heat Flux Hot Channel Factor for Specification 3/4.2.2,
  - g. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3, and
  - h. Allowable Power Level for Specification 3/4.2.6.
- 6.9.1.9.2 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:
- a. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (Westinghouse Proprietary),
  - b. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," September 1974 (Westinghouse Proprietary),
  - c. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control/ $F_Q$  Surveillance Technical Specification," February 1994 (Westinghouse Proprietary),
  - d. WCAP-10266-P-A Rev. 2, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," March 1987 (Westinghouse Proprietary).
  - e. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," July 1991 (Westinghouse Proprietary).

**Attachment 2b to AEP:NRC:5090**

**Unit 2 Current Technical Specification Pages Marked to  
Show Proposed Changes**

**Revised Pages**

**Unit 2**

**6-10**

**6-12**

## 6.0 ADMINISTRATIVE CONTROLS

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### STARTUP REPORT (Continued)

- 6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

### ANNUAL REPORTS<sup>1</sup>

- 6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.
- 6.9.1.5 Reports required on an annual basis shall include:
- a. ~~A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving annual exposures greater than 100 mrem according to work and job functions<sup>2</sup>, e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance (describe maintenance), waste processing and refueling. Also included is a tabulation of the total person-rem exposures for station, utility, and other personnel associated with each work and job function. The dose assignment to various duty functions may be estimates based on pocket dosimeter, electronic dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose received shall be assigned to specific major work functions. DELETED.~~
  - b. The complete results of steam generator tube in-service inspections performed during the report period (reference Specification 4.4.5.5.b).
  - c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.
  - d. Information regarding any instances when the I-131 specific activity limit was exceeded.

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<sup>1</sup> A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

<sup>2</sup> This tabulation supplements the requirements of 20.2206 of 10 CFR Part 20. DELETED

## 6.0 ADMINISTRATIVE CONTROLS

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### MONTHLY REACTOR OPERATING REPORT

6.9.1.8 ~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission (Attn: Document Control Desk), Washington, D.C. 20555, with a copy to the Regional Office no later than the 15th of each month following the calendar month covered by the report.~~ DELETED

### CORE OPERATING LIMITS REPORT

6.9.1.9.1 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:

- a. Moderator Temperature Coefficient Limits for Specification 3/4.1.1.4,
- b. Rod Drop Time Limits for Specification 3/4.1.3.4,
- c. Shutdown Rod Insertion Limits for Specification 3/4.1.3.5,
- d. Control Rod Insertion Limits for Specification 3/4.1.3.6,
- e. Axial Flux Difference for Specification 3/4.2.1,
- f. Heat Flux Hot Channel Factor for Specification 3/4.2.2,
- g. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3, and
- h. Allowable Power Level for Specification 3/4.2.6.

6.9.1.9.2 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:

- a. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (Westinghouse Proprietary),
- b. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," September 1974 (Westinghouse Proprietary),
- c. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control/ $F_Q$  Surveillance Technical Specification," February 1994 (Westinghouse Proprietary),
- d. WCAP-10266-P-A Rev. 2, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," March 1987 (Westinghouse Proprietary).
- e. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," July 1991 (Westinghouse Proprietary).

Attachment 3a to AEP:NRC:5090

Unit 1 Improved Technical Specification Pages Marked to  
Show Proposed Changes

Revised Pages

Unit 1

5.6-1

5.6-2

## 5.0 ADMINISTRATIVE CONTROLS

### 5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

#### 5.6.1 Occupational Radiation Exposure Report

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NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

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A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year. ~~DELETED~~

#### 5.6.2 Annual Radiological Environmental Operating Report

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NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

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The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

## 5.6 Reporting Requirements

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### 5.6.2 Annual Radiological Environmental Operating Report (continued)

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

### 5.6.3 Radioactive Effluent Release Report

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NOTE

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A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station.

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The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted within 90 days of January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

### 5.6.4 Monthly Operating Reports

~~Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~ DELETED

### 5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
  1. SL 2.1.1, "Reactor Core Safety Limits";
  2. LCO 3.1.1, "SHUTDOWN MARGIN (SDM)";
  3. LCO 3.1.3, "Moderator Temperature Coefficient (MTC)";
  4. LCO 3.1.5, "Shutdown Bank Insertion Limits";

**Attachment 3b to AEP:NRC:5090**

**Unit 2 Improved Technical Specification Pages Marked to  
Show Proposed Changes**

**Revised Pages**

**Unit 2**

**5.6-1**

**5.6-2**

## 5.0 ADMINISTRATIVE CONTROLS

### 5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

#### 5.6.1 Occupational Radiation Exposure Report

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NOTE

~~A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.~~

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~~A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year. ~~DELETED~~~~

#### 5.6.2 Annual Radiological Environmental Operating Report

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NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

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The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

## 5.6 Reporting Requirements

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### 5.6.2 Annual Radiological Environmental Operating Report (continued)

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

### 5.6.3 Radioactive Effluent Release Report

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NOTE

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A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station.

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The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted within 90 days of January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

### 5.6.4 Monthly Operating Reports

~~Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~ DELETED

### 5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
  1. SL 2.1.1, "Reactor Core Safety Limits";
  2. LCO 3.1.1, "SHUTDOWN MARGIN (SDM)";
  3. LCO 3.1.3, "Moderator Temperature Coefficient (MTC)";
  4. LCO 3.1.5, "Shutdown Bank Insertion Limits";

Attachment 4a to AEP:NRC:5090

Unit 1 Proposed Current Technical Specification Pages

Revised Pages

Unit 1

6-10

6-12

## 6.0 ADMINISTRATIVE CONTROLS

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### 6.9 STARTUP REPORT (Continued)

- 6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

### ANNUAL REPORTS<sup>1</sup>

- 6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.
- 6.9.1.5 Reports required on an annual basis shall include:
- a. DELETED<sup>2</sup>
  - b. The complete results of steam generator tube in-service inspections performed during the report period (reference Specification 4.4.5.5.b).
  - c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.
  - d. Information regarding any instances when the I-131 specific activity limit was exceeded.

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<sup>1</sup> A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

<sup>2</sup> DELETED

## 6.0 ADMINISTRATIVE CONTROLS

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6.9.1.8 DELETED

### CORE OPERATING LIMITS REPORT

6.9.1.9.1 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:

- a. Moderator Temperature Coefficient Limits for Specification 3/4.1.1.4,
- b. Rod Drop Time Limits for Specification 3/4.1.3.3,
- c. Shutdown Rod Insertion Limits for Specification 3/4.1.3.4,
- d. Control Rod Insertion Limits for Specification 3/4.1.3.5,
- e. Axial Flux Difference for Specification 3/4.2.1,
- f. Heat Flux Hot Channel Factor for Specification 3/4.2.2,
- g. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3, and
- h. Allowable Power Level for Specification 3/4.2.6.

6.9.1.9.2 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:

- a. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (Westinghouse Proprietary),
- b. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," September 1974 (Westinghouse Proprietary),
- c. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control/F<sub>Q</sub> Surveillance Technical Specification," February 1994 (Westinghouse Proprietary),
- d. WCAP-10266-P-A Rev. 2, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," March 1987 (Westinghouse Proprietary).
- e. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," July 1991 (Westinghouse Proprietary).

Attachment 4b to AEP:NRC:5090

Unit 2 Proposed Current Technical Specification Pages

Revised Pages

Unit 2

6-10

6-12

## 6.0 ADMINISTRATIVE CONTROLS

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### STARTUP REPORT (Continued)

- 6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

### ANNUAL REPORTS<sup>1</sup>

- 6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.
- 6.9.1.5 Reports required on an annual basis shall include:
- a. DELETED<sup>2</sup>
  - b. The complete results of steam generator tube in-service inspections performed during the report period (reference Specification 4.4.5.5.b).
  - c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.
  - d. Information regarding any instances when the I-131 specific activity limit was exceeded.

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<sup>1</sup> A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

<sup>2</sup> DELETED

## 6.0 ADMINISTRATIVE CONTROLS

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6.9.1.8 DELETED

### CORE OPERATING LIMITS REPORT

6.9.1.9.1 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:

- a. Moderator Temperature Coefficient Limits for Specification 3/4.1.1.4,
- b. Rod Drop Time Limits for Specification 3/4.1.3.4,
- c. Shutdown Rod Insertion Limits for Specification 3/4.1.3.5,
- d. Control Rod Insertion Limits for Specification 3/4.1.3.6,
- e. Axial Flux Difference for Specification 3/4.2.1,
- f. Heat Flux Hot Channel Factor for Specification 3/4.2.2,
- g. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3, and
- h. Allowable Power Level for Specification 3/4.2.6.

6.9.1.9.2 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:

- a. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (Westinghouse Proprietary),
- b. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," September 1974 (Westinghouse Proprietary),
- c. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control/F<sub>Q</sub> Surveillance Technical Specification," February 1994 (Westinghouse Proprietary),
- d. WCAP-10266-P-A Rev. 2, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," March 1987 (Westinghouse Proprietary).
- e. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," July 1991 (Westinghouse Proprietary).

Attachment 5a to AEP:NRC:5090

Unit 1 Proposed Improved Technical Specification Pages

Revised Pages Unit 1

5.6-1

5.6-2

## 5.0 ADMINISTRATIVE CONTROLS

### 5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 DELETED

5.6.2 Annual Radiological Environmental Operating Report

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NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

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The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

## 5.6 Reporting Requirements

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### 5.6.2 Annual Radiological Environmental Operating Report (continued)

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

### 5.6.3 Radioactive Effluent Release Report

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NOTE

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A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station.

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The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted within 90 days of January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

### 5.6.4 DELETED

### 5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
  1. SL 2.1.1, "Reactor Core Safety Limits";
  2. LCO 3.1.1, "SHUTDOWN MARGIN (SDM)";
  3. LCO 3.1.3, "Moderator Temperature Coefficient (MTC)";
  4. LCO 3.1.5, "Shutdown Bank Insertion Limits";

Attachment 5b to AEP:NRC:5090

Unit 2 Proposed Improved Technical Specification Pages

Revised Pages

Unit 2

5.6-1

5.6-2

## 5.0 ADMINISTRATIVE CONTROLS

### 5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 DELETED

5.6.2 Annual Radiological Environmental Operating Report

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NOTE

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A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

---

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

## 5.6 Reporting Requirements

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### 5.6.2 Annual Radiological Environmental Operating Report (continued)

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

### 5.6.3 Radioactive Effluent Release Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station.

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The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted within 90 days of January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

### 5.6.4 DELETED

### 5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. SL 2.1.1, "Reactor Core Safety Limits";
  2. LCO 3.1.1, "SHUTDOWN MARGIN (SDM)";
  3. LCO 3.1.3, "Moderator Temperature Coefficient (MTC)";
  4. LCO 3.1.5, "Shutdown Bank Insertion Limits";

Attachment 6 to AEP:NRC:5090

Commitment

The following table identifies those actions committed to by Indiana Michigan Power Company (I&M) in this document. Any other actions discussed in this submittal represent intended or planned actions by I&M. They are described to the Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

Commitment	Due Date
Using an industry database, I&M will provide the NRC the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The commitment will be based on the use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).	Ongoing