



**INDIANA
MICHIGAN
POWER**

A unit of American Electric Power

Indiana Michigan Power
Cook Nuclear Plant
One Cook Place
Bridgman, MI 49106
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August 5, 2005

AEP:NRC:5901-05

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)

- 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. Letter from M. K. Nazar, Indiana Michigan Power Company, to Nuclear Regulatory Commission Document Control Desk, "Donald C. Cook Nuclear Plant Unit 1 and Unit 2, License Amendment Request - Conversion of Current Technical Specifications (CTS) to Improved Technical Specifications (ITS)," AEP:NRC:4901, Accession Number ML041200298, dated April 6, 2004.

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.

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During preparations for implementing the ITS, Indiana Michigan Power Company (I&M) discovered an administrative error in Reference 2 involving the conversion of CTS Surveillance Requirement (SR) 4.8.1.1.2.e.11 to ITS SR 3.8.1.18. Both of these requirements are intended to verify operability of the emergency diesel generator load sequencing relays. However, the times to be measured and the associated acceptance criterion of ITS SR 3.8.1.18 are not the same as CTS SR 4.8.1.1.2.e.11, even though Reference 2 indicated that the requirements were the same (ITS addresses time intervals between starting of sequenced loads, whereas CTS addresses acceptable times for the starting of each individual sequenced load). Therefore, Reference 2 should have converted the CTS SR 4.8.1.1.2.e.11 requirements to ITS SR 3.8.1.18 with no change in technical meaning. As a result, both CNP Unit 1 and Unit 2 ITS pages 3.8.1-14 require a change to reflect the current licensing basis, as intended in Reference 2.

This inadvertent change was not recognized by I&M during preparation of Reference 2, and was also not recognized by the NRC reviewers during preparation of Reference 1, because the CTS pages in Reference 2, as marked to show proposed changes, did not show any revision to the technical requirements of CTS SR 4.8.1.1.2.e.11. Further, there was no annotation to a Discussion of Change that would have indicated to the NRC reviewer that a change was intended. Therefore, the intent to maintain the current licensing basis for this SR was clear in Reference 2.

On this basis, 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. This correction would replace the more restrictive requirements of ITS SR 3.8.1.18 with the wording of CTS SR 4.8.1.1.2.e.11 with only minor editorial changes.

As a corrective action, an independent technical review was performed by I&M Engineering for each Limiting Condition for Operation, Applicability, Action, and SR in ITS 3.8, Electrical Systems. No other administrative errors affecting ITS 3.8 were found. In addition, an independent technical and supervisory review was performed by I&M Engineering of the validation and design input information originally provided by I&M Engineering to the ITS Project development team. This information was provided in response to open items created by the ITS Project development team to ensure completeness and accuracy of the design information provided in Reference 2. No additional changes to the ITS were found to be necessary.

Past precedents for correcting these types of administrative errors following conversion from CTS to ITS include the following:

1. Letter from B. A. Wetzel, Nuclear Regulatory Commission, to M. Reddemann, Point Beach Nuclear Plant, Nuclear Management Company, LLC, "Point Beach Nuclear Plant, Units 1 and 2 - Correction to Amendment Nos. 201 and 206 (TAC Nos. MA7186 and MA7187)," Accession Number ML013050062, dated November 16, 2001.
2. Letter from L. N. Hartz, Virginia Electric and Power Company, to Document Control Desk, Nuclear Regulatory Commission, "Virginia Electric and Power Company (Dominion), North

Anna Power Station Units 1 and 2, Improved Technical Specifications, Correction of Administrative Error (TAC Nos. MB0799 and MB0800)," Accession Number ML021550518, dated May 28, 2002.

3. Letter from S R. Monarque, Nuclear Regulatory Commission, to D. A. Christian, Virginia Electric and Power Company, "North Anna Power Station, Units 1 and 2 - Improved Technical Specifications: Correction of Administrative Error (TAC Nos. MB5249 and MB5250)," Accession Number ML021770436, dated June 26, 2002.
4. Letter from T. Kim, Nuclear Regulatory Commission, to M. Nazar, Prairie Island Nuclear Generating Plant, Nuclear Management Company, LLC, "Prairie Island Nuclear Generating Plant, Units 1 and 2 - Correction to Amendment Nos. 158 and 149 Regarding Conversion to Improved Technical Specifications," Accession Number ML022590537, dated September 13, 2002.

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 September 19, 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, Licensing and Technical Specification Supervisor, at (269) 466-2649.

Sincerely,



Daniel P. Fadel
Engineering 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, AEP Ft. Wayne, 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

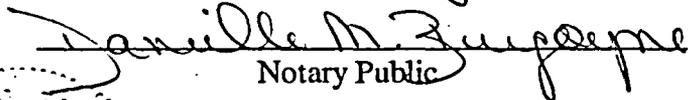
I, Daniel P. Fadel, being duly sworn, state that I am Engineering Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining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

Indiana Michigan Power Company


Daniel P. Fadel
Engineering Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 5 DAY OF August, 2005


Notary Public

My Commission Expires Apr. 4, 2008



DANIELLE M. BURGOYNE
Notary Public, State of Michigan
County of Berrien
My Commission Expires Apr. 4, 2008
Acting in the County of Berrien

Attachment 1 to AEP:NRC:5901-05

**DONALD C. COOK NUCLEAR PLANT
UNIT 1 AND UNIT 2 TECHNICAL SPECIFICATION PAGES
MARKED TO SHOW CHANGES**

Pages Affected

Unit 1: 3.8.1-14

Unit 2: 3.8.1-14

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.18</p> <p>-----NOTE----- This Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the unit is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR.</p> <p>-----</p> <p>Verify interval between each sequenced load block is that the automatic sequence timing relays are OPERABLE with each load sequence time within ± 5% of design interval for each emergency time delay relay its required value and that each load is sequenced on within the design allowable time limit.</p>	<p>24 months</p>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.18</p> <p>-----NOTE----- This Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the unit is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR.</p> <p>-----</p> <p>Verify interval between each sequenced load block is that the automatic sequence timing relays are OPERABLE with each load sequence time within $\pm 5\%$ of design interval for each emergency time delay relay its required value and that each load is sequenced on within the design allowable time limit.</p>	<p>24 months</p>

Attachment 2 to AEP:NRC:5901-05

**DONALD C. COOK NUCLEAR PLANT
UNIT 1 AND UNIT 2 TECHNICAL SPECIFICATION PAGES
WITH THE PROPOSED CHANGES INCORPORATED**

Pages Affected

Unit 1: 3.8.1-14
Unit 2: 3.8.1-14

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.18</p> <p>-----NOTE----- This Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the unit is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR.</p> <p>-----</p> <p>Verify that the automatic sequence timing relays are OPERABLE with each load sequence time within $\pm 5\%$ of its required value and that each load is sequenced on within the design allowable time limit.</p>	<p>24 months</p>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.18</p> <p>-----NOTE----- This Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the unit is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. -----</p> <p>Verify that the automatic sequence timing relays are OPERABLE with each load sequence time within $\pm 5\%$ of its required value and that each load is sequenced on within the design allowable time limit.</p>	<p>24 months</p>