September 9, 2005

Mr. Mano K. Nazar Senior Vice President and Chief Nuclear Officer Indiana Michigan Power Company Nuclear Generation Group One Cook Place Bridgman, MI 49106

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 - ISSUANCE OF

AMENDMENTS RE: SAFETY EVALUATION REGARDING ONE TIME ALLOWED OUTAGE TIME EXTENSION FOR THE 69 KV OFFSITE POWER

CIRCUIT (TAC NOS. MC4525 AND MC4526)

Dear Mr. Nazar:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 289 to Renewed Facility Operating License No. DPR-58 and Amendment No. 271 to Renewed Facility Operating License No. DPR-74 for the Donald C. Cook Nuclear Plant, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated September 21, 2004, as supplemented by letters dated April 7, May 6, and August 10, 2005.

Your September 21, 2004, letter, proposed amendments that would extend the allowed outage times (AOTs) from 72 hours to 14 days for an inoperable emergency diesel generator (EDG), an inoperable component cooling water (CCW) system loop, an inoperable essential service water (ESW) system loop, or an inoperable alternate offsite power circuit (69 kilovolt (kV) circuit). However, by letter dated April 7, 2005, you withdrew your amendment request for extended CCW and ESW AOT, and limited the extended 69 kV circuit AOT to a one-time usage.

This amendment adds a license condition related to the 69 kV offsite power circuit limiting conditions for operation action statements. The proposed change to extend the AOT specified in TS 3.8.1, "AC Sources -Operating," to restore an inoperable EDG to operable status from the current 72 hours to 14 days will be addressed by separate correspondence. The proposed change addressed by this safety evaluation adds a license condition to extend the required action completion time for an inoperable alternate offsite power source (69 kV circuit) from the current 72 hours to 14 days on a one-time basis.

M. Nazar -2-

A copy of our related safety evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Deirdre W. Spaulding, Project Manager, Section 1 Project Directorate III Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosures: 1. Amendment No. 289 to DPR-58

2. Amendment No. 271 to DPR-74

3. Safety Evaluation

cc w/encls: See next page

M. Nazar -2-

A copy of our related safety evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

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NAME	DSpaulding	DClarke for	RJenkins	AHodgdon	HChernoff for
		THarris		_	LRaghavan
DATE	9/9/05	9/9/05	08/16/05	9/7/05	9/9/05

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Donald C. Cook Nuclear Plant, Units 1 and 2

CC:

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Mr. Joseph N. Jensen, Site Vice President Indiana Michigan Power Company Nuclear Generation Group One Cook Place Bridgman, MI 49106

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-315

DONALD C. COOK NUCLEAR PLANT, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 289 Renewed Operating License No. DPR-58

- 1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Indiana Michigan Power Company (the licensee) dated September 21, 2004, as supplemented by letters dated April 7, May 6, and August 10, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

- 2. Accordingly, the license is amended to add paragraph 2.C.(13) to Renewed Facility Operating License No. DPR-58 as follows:
 - (13) The 72 hour allowed outage time of Technical Specifications 3.8.1.1 Action "a" may be extended to 14 days one time for the 69 kilovolt (alternate) independent offsite power circuit when it is made inoperable to complete connection of the Supplemental Diesel Generators to the existing plant electrical system and to perform upgrades to the alternate offsite power supply circuit.
- 3. This license amendment is effective as of its date of issuance and shall be implemented within 120 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA by Harold Chernoff for/

L. Raghavan, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Renewed Facility

Operating License

Date of Issuance: September 9, 2005

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-316

DONALD C. COOK NUCLEAR PLANT, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 271 Renewed Facility License No. DPR-74

- 1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Indiana Michigan Power Company (the licensee) dated September 21, 2004, as supplemented by letters dated April 7, May 6, and August 10, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

- 2. Accordingly, the license is amended to add paragraph 2.C.(aa) to Renewed Facility Operating License No. DPR-74 as follows:
 - (aa) The 72 hour allowed outage time of Technical Specifications 3.8.1.1 Action "a" may be extended to 14 days one time for the 69 kilovolt (alternate) independent offsite power circuit when it is made inoperable to complete connection of the Supplemental Diesel Generators to the existing plant electrical system and to perform upgrades to the alternate offsite power supply circuit.
- 3. This license amendment is effective as of its date of issuance and shall be implemented within 120 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA by Harold Chernoff for/

L. Raghavan, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Renewed Facility
Operating License

Date of Issuance: September 9, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 289

TO RENEWED FACILITY OPERATING LICENSE NO. DPR-58

DOCKET NO. 315

Replace the following page of Renewed Facility Operating License No. DPR-58 with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the area of change.

REMOVE INSERT 4

June 30, 1986, January 28, 1987, May 26, 1987, June 16, 1988, June 17, 1988, June 7, 1989, February 1, 1990, February 9, 1990, March 26, 1990, April 26, 1990, March 31, 1993, April 8, 1993, December 14, 1994, January 24, 1995, April 19, 1995, June 8, 1995, and March 11, 1996, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- (5) Deleted by Amendment No. 279
- (6) Deleted by Amendment No. 80
- (7) Deleted by Amendment No. 287
- (8) Deleted by Amendment No. 279
- (9) Deleted by Amendment No. 279
- (10) Deleted by Amendment No. 279
- (11) Deleted by Amendment No. 279
- (12) 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.
- (13) The 72 hour allowed outage time of Technical Specifications 3.8.1.1 Action "a" may be extended to 14 days one time for the 69 kilovolt (alternate) independent offsite power circuit when it is made inoperable to complete connection of the Supplemental Diesel Generators to the existing plant electrical system and to perform upgrades to the alternate offsite power supply circuit.
- (5) Physical Protection

The Indiana Michigan Power Company shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822), and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans¹, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Donald C. Cook Nuclear Plant Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0," submitted by letter dated October 12, 2004.

- (5) Deleted by Amendment No. 80
- (5) Deleted by Amendment No. 80
- (5) In all places of this renewed operating license, the reference to the Indiana and Michigan Electric Company is amended to read Indiana Michigan Power Company.

¹ The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

ATTACHMENT TO LICENSE AMENDMENT NO. 271

TO RENEWED FACILITY OPERATING LICENSE NO. DPR-74

DOCKET NO. 316

Replace the following page of Renewed Facility Operating License No. DPR-74 with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the area of change.

REMOVE INSERT

April 8, 1993, December 14, 1994, January 24, 1995, April 19, 1995, June 8, 1995, and March 11, 1996, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- (p) Deleted by Amendment No. 121
- (q) Deleted by Amendment No. 2
- (r) Deleted by Amendment No. 68
- (s) Deleted by Amendment No. 261
- (t) Deleted by Amendment No. 63
- (u) Deleted by Amendment No. 261
- (v) Deleted by Amendment No. 269
- (w) Deleted by Amendment No. 261
- (x) Deleted by Amendment No. 261
- (y) Deleted by Amendment No. 261
- (z) The 72-hour allowed outage time of Technical Specification 3.8.1.1 Action "b" which was entered at 0923, on December 7, 2003, may be extended one time by an additional 72 hours to complete repair and testing of the 2 AB diesel generator.
- (aa) The 72 hour allowed outage time of Technical Specifications 3.8.1.1 Action "a" may be extended to 14 days one time for the 69 kilovolt (alternate) independent offsite power circuit when it is made inoperable to complete connection of the Supplemental Diesel Generators to the existing plant electrical system and to perform upgrades to the alternate offsite power supply circuit.

D. <u>Physical Protection</u>

The Indiana Michigan Power Company shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822), and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans¹, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Donald C. Cook Nuclear Plant Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0," submitted by letter dated October 12, 2004.

¹ The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 289

TO RENEWED FACILITY OPERATING LICENSE NO. DPR-58

AND AMENDMENT NO. 271 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-74

INDIANA MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-315 AND 50-316

1.0 INTRODUCTION

By letter to the Nuclear Regulatory Commission (NRC, the Commission) dated September 21, 2004, as supplemented by letters dated April 7, May 6, and August 10, 2005, the Indiana Michigan Power Company proposed changes to Donald C. Cook Nuclear Plant, Units 1 and 2 (D. C. Cook) technical specifications (TSs) related to the emergency diesel generator (EDG) and the 69 kilovolt (kV) offsite power circuit limiting conditions for operation (LCO) action statements. By letter dated April 7, 2005, the licensee withdrew its request for extended component cooling water (CCW) and essential service water (ESW) allowed outage times (AOTs).

This amendment adds a license condition related to the 69 kV offsite power circuit limiting conditions for operation (LCO) action statements. The proposed change to extend the AOTs specified in TS 3.8.1, "AC Sources - Operating," to restore an inoperable EDG to operable status from the current 72 hours to 14 days will be addressed by separate correspondence. The proposed change addressed by this safety evaluation adds a license condition to extend the AOT for an inoperable alternate offsite power source (69 kV circuit) from the current 72 hours to 14 days on a one-time basis.

The purpose of the proposed change is to provide the licensee with needed flexibility to complete the one-time connection of the supplemental diesel generators (SDGs).

The supplemental letters contained clarifying information and did not change the initial no significant hazards consideration determination or expand the scope of the original *Federal Register* notice.

2.0 REGULATORY EVALUATION

The regulatory requirements that the NRC staff applied in its review of the application include:

General Design Criterion (GDC) 17, "Electric power systems," of Appendix A, "General Design Criteria for Nuclear Power Plants," to Part 50 of Title 10 of the *Code of Federal Regulations*

(CFR) states, in part, that nuclear power plants have onsite and offsite electric power systems to permit the functioning of structures, systems, and components that are important to safety. The onsite system is required to have sufficient independence, redundancy, and testability to perform its safety function, assuming a single-failure. The offsite power system is required to be supplied by two physically independent circuits that are designed and located so as to minimize, to the extent practical, the likelihood of their simultaneous failure under operating and postulated accident and environmental conditions. In addition, this criterion requires provisions to minimize the probability of losing electric power from the remaining electric power supplies as a result of loss of power from the unit, the offsite transmission network, or the onsite power supplies.

GDC-18, "Inspection and testing of electric power systems," states that electric power systems that are important to safety be designed to permit appropriate periodic inspection and testing to assess the continuity of the systems and the conditions of their components.

Section 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants," requires that preventive maintenance activities not reduce the overall availability of the systems, structures and components. It also requires that before performing maintenance activities, the licensee assess and manage the increase in risk that may result from the proposed maintenance activities.

Regulatory Guide (RG) 1.93, "Availability of Electric Power Sources," provides guidance with respect to operating restrictions (i.e., AOTs) if the number of available alternate current (AC) sources is less than that required by the TS LCO. In particular, this guide prescribes an AOT of 72 hours for an inoperable onsite or offsite AC source.

3.0 BACKGROUND

As described in the licensee's submittal dated September 21, 2004, the offsite AC power to D. C. Cook is provided by connections to the American Electric Power Company (AEP) transmission system. The AEP transmission system uses 345 kV and 765 kV transmission lines for bulk supply. Connections from the AEP system to other utilities are maintained by the East Central Area Reliability Coordination Agreement, creating a reliable integrated network.

The Unit 1 and 2 offsite power sources consist of the 345 kV offsite circuit (preferred) from the 345 kV/765 kV switchyards and the 69 kV offsite circuit (alternate). These offsite circuits are physically independent from each other. The preferred offsite system connects the offsite transmission network to the station through seven offsite circuits. Six 345 kV lines connect to the 345 kV switchyard. The 345 kV switchyard supplies power to a 345 kV/34.5 kV transformer (TR 5) and a 765/345/345 kV transformer (TR 4). The seventh offsite circuit is a 765 kV line from the 765 kV switchyard, which also feeds TR 4. TR 4 and TR 5 supply power to the 4.16 kV buses via reserve auxiliary transformers (RATs). The RATs are designated as TR 101 CD (TR 201 CD) for Train A and TR 101 AB (TR 201 AB) for Train B. The power supply configuration is normally in a split-bus arrangement, with the Train A RATs aligned to TR 4 via circuit breaker 12 CD and the Train B RAT aligned to TR 5 via circuit breaker 12 AB. Under certain conditions, TR 4 or TR 5 may be aligned to supply both trains in Units I and 2. RAT TR 101 CD (TR 201 CD) supplies the Train A 4.16 kV emergency bus T11C (T21C) via bus 1C (2C) while emergency bus T11D (T21D) is supplied via bus 1D (2D). RAT TR 101 AB (TR 201 AB) supplies the Train B 4.16 kV emergency bus T11A (T 21 A) via bus 1A (2A) while

emergency bus T11B (T21B) is supplied via bus 1B (2B). The Train A and Train B 4.16 kV emergency buses, which are normally supplied by the turbine generator via the unit auxiliary transformers (UATs), will automatically transfer to the RATs as a result of a turbine generator trip.

A 69 kV line supplies the alternate offsite circuit. The 69 kV line supplies transformers TR 12EP-1 and TR 12EP-2, either of which can be manually aligned, via 4.16 kV Bus 1, to directly supply Train A 4.16 kV emergency buses T11C (T21C) and T11D (T21D) or Train B 4.16 kV emergency buses T11A (T21B) and T11B (T21B). The 69 kV circuit is supplied power from 69 kV tap station approximately 2 miles away.

The emergency onsite AC power source for each unit consists of two 4.16 kV, 3-phase, 60 cycles, 3500 kW EDGs. One EDG supplies each engineered safety feature (ESF) bus train. DG 1-CD (2-CD) is dedicated to 4.16 kV emergency buses T11C (T21C) and T11D (T21D). DG 1-AB (2-AB) is dedicated to 4.16 kV emergency buses T11A (T21A) and T11AB (T21B). The EDGs start automatically on a loss of voltage signal to the 4.16 kV buses, which is sensed by loss of voltage relays. Upon sensing a loss of voltage signal, master relays automatically start the EDGs, trip the normal feed breakers for the 4.16 kV buses and trip all motor feeder breakers and 480 V bus transformer feeder breakers on the buses, the 600 volt bus tie breaker, and all non-essential 600 volt feeder breakers and 480 volt bus breakers. The EDG will also start and operate in the standby mode without connecting to the emergency bus on a safety injection signal without a concurrent loss of voltage signal. When the EDGs are tied to the emergency bus, loads are then sequentially connected by individual time delay relays. The individual time delay relays, therefore, control the permissive and starting signals to motor breakers to prevent overloading the EDG by automatic load application.

The EDGs are monitored under the Maintenance Rule (MR) program in accordance with 10 CFR 50.65, and are currently in the 10 CFR 50.65 (a)(2) category. This indicates that the EDGs are meeting their established MR reliability and unavailability goals.

In addition to the above, the licensee is installing two backup SDGs to supply safe shutdown loads. SDGs will be used to reduce overall plant risk. The SDGs will be commercial-grade and will be connected to the 69 kV substation. The SDG components will be protected against the effects of likely weather-related events. The electrical output of the two SDGs will be connected to 4.16 kV Bus 1, between the secondary side of transformer and circuit breakers 1EP and 2EP. The connections from the circuit breakers to the 4.16 kV ESF buses in the plant are routed underground.

4.0 ONE-TIME 14 DAY AOT EXTENSION FOR 69 KV OFFSITE POWER CIRCUIT

The licensee has proposed to add a license condition to extend the AOT for the 69 kV offsite circuit (one of the offsite power sources) from the current 72 hours to 14 days on a one time basis. The extension will be used one time to complete connection of the SDGs to the existing plant electrical system and to perform upgrades to the alternate power circuit. The licensee proposes that the following license condition be added to Section 2.C of the D. C. Cook operating licenses.

The 72 hours allowed outage time of TSs 3.8.1.1 Action "a" may be extended to 14 days one time for the 69 kV (alternate) qualified offsite circuit when it is made inoperable to complete connection of the supplemental diesel generators to the existing plant electrical system and to perform upgrades to the alternate offsite power supply circuit.

Based on the above, the NRC staff concludes that with the compensatory actions implemented before and during the extended AOT extension for the 69 kV alternate power circuit, as described in Section 5.0 below, the proposed one-time extension is acceptable.

5.0 REGULATORY COMMITMENTS

The licensee has provided the following regulatory commitments:

- A. Prior to entering the extended 69 kV circuit AOT, the following compensatory actions will be implemented:
 - Hold discussion with the system load dispatcher to: 1) ensure no significant grid
 perturbations are expected during the extended AOT; and 2) request that the
 system load dispatcher inform D. C. Cook if conditions change during the
 extended AOT such that unacceptable voltage would occur following a unit trip.
 - Evaluate weather conditions. The extended AOT would not be entered if official weather forecasts for the plant site are predicting severe conditions (tornado, thunderstorm, or ice storm conditions).
 - Evaluate the condition of the switchyard, offsite power supply, and the grid. An
 extended 69 kV circuit AOT will not be entered when grid stress conditions are
 high such as during extreme summer temperatures and/or high demand.
- B. During the extended 69 kV circuit AOT, the following compensatory actions will be implemented:
 - Monitor weather conditions daily in accordance with the D. C. Cook on-line risk management program, and take appropriate actions if severe weather is expected.
 - Perform an evaluation per 10 CFR 50.65 (a)(4) if any testing and maintenance activities must be conducted.
 - Designate the turbine driven auxiliary feedwater (TDAFW) pump as guarded equipment.
 - Prohibit elective switchyard maintenance during the 69 kV circuit AOT, other than that directly associated with the 69 kilovolt offsite circuit. In addition, prohibit elective maintenance on the main, auxiliary (Unit Auxiliary), or startup (Reserve Auxiliary) transformers associated with the unit.

The licensee committed to designate the TDAFW pump as guarded equipment when credited

as available for extending the 69 kV offsite power circuit AOT. The licensee's on-line risk procedure requires that any work activity in a guarded equipment area be reviewed to determine if the activity may cause an adverse impact on the guarded equipment. If the activity is determined to result in an adverse impact, the work may not proceed unless two individuals qualified to perform risk assessments using the safety monitor configuration risk management software determine the risk to be acceptable.

The NRC staff concludes that reasonable controls for the implementation and subsequent evaluation of the proposed changes pertaining to the above regulatory commitments are best provided by the licensee's administrative processes, including its commitment management program. The above regulatory commitments do not warrant the creation of regulatory requirements.

6.0 NRC STAFF'S CONCLUSION

Based on the above considerations, the NRC staff finds that the licensee's proposed request to add a license condition to extend the AOT on a one-time basis for an inoperable 69 kV alternate offsite power circuit from 72 hours to 14 days is acceptable.

Further, the NRC staff believes that regulatory commitments to implement other restrictions and compensatory measures would ensure the availability of the remaining sources of AC power during the extended AOT for the 69 kV alternate power source.

7.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendments. The State official had no comments.

8.0 ENVIRONMENTAL CONSIDERATION

These amendments change the requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding (69 FR 62476). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

9.0 CONCLUSION

The NRC staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the

common defense and security or to the health and safety of the public.

Principal Contributor: O. Chopra

Date: September 9, 2005