January 4, 2001

Mr. Robert P. Powers, Senior Vice President
Indiana Michigan Power Company
Nuclear Generation Group
500 Circle Drive
Buchanan, MI 49107

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 - CHANGES TO IMPLEMENTATION OF POST-ACCIDENT SAMPLING SYSTEM COMMITMENTS (TAC NOS. MA8960 AND MA8961)

Dear Mr. Powers:

By letter dated January 28, 2000, Indiana Michigan Power Company (I&M), the licensee, notified the U.S. Nuclear Regulatory Commission (NRC) that Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, has implemented changes to the post-accident sampling system (PASS) commitments. Attachment 1 to the January 28th letter included a description of the changes to the PASS licensing basis. Attachment 2 included a list of actions committed to by I&M in the January 28th letter. The January 28th letter did not request any NRC response or action on this matter.

The licensing basis for the PASS was established in correspondence between I&M and the NRC in response to Item II.B.3, "Post accident sampling capability," of NUREG-0737, "Clarification of TMI Action Plan Requirements." By letter dated March 14, 1983, the NRC issued a confirmatory order which established that the installation of the PASS system, in accordance with the I&M correspondence, was complete.

The changes described in the January 28, 2000, letter and the stated reasons for the changes are summarized as follows:

1. The testing frequency of the containment sump sampling equipment is changed from once every six months to once every refueling cycle. Sampling every six months would require either testing at power or a plant shutdown every six months. Testing at power would not be consistent with the as low as reasonably achievable (ALARA) considerations and shutdowns every six months can have detrimental effects. In addition, other liquid sample points are tested on a semi-annual frequency. Accordingly, the test frequency is changed from once every six months to once every refueling cycle.

2. The lower limit of detection for the chloride in undiluted samples is changed from 0.01 parts per million (ppm) to 0.05 ppm. This is based on recent work which has established a new lower limit of detection of 0.05 ppm for undiluted samples.

3. The distinction between recommended instrument accuracy limits and actual instrument uncertainty values measured by validation testing is clarified. This clarification is necessary to eliminate confusion regarding recommended instrument accuracy limits and actual instrument uncertainty values. The recommended accuracy limits and instrument ranges will be incorporated into the updated final safety analysis report (UFSAR).

4. The analytical equipment and methods used for the boron and dissolved oxygen analyses are changed. The licensee's original submittal included detailed descriptions of the equipment being used at the time for boron and dissolved oxygen analyses. Equipment makes and models for the equipment used were provided in the original submittals. This change is necessary to recognize that original equipment may be changed and that original makes and models may be obsolete at the time of the change. Changes to PASS equipment will continue to be performed in accordance with the requirements of 10 CFR 50.59.

5. The use of labor resources other than outside contractors to implement the preventive maintenance program for the PASS is being allowed. The licensee's original submittal stated that preventive maintenance will be performed by an outside contractor. The commitment is being revised to allow the use of other (e.g., I&M plant personnel) labor resources.

Based on the January 28th letter, we understand that these changes were: (1) reviewed in accordance with the requirements of 10 CFR 50.59, (2) reviewed in accordance with I&M's commitment management program, which is based on the Nuclear Energy Institute (NEI) guidance on managing NRC commitments, and (3) evaluated against the NEI guidance document criterion pertaining to commitments necessary to achieve compliance with an obligation and the criterion pertaining to commitments used as a basis for an NRC safety evaluation. Based on the 10 CFR 50.59 review, I&M determined that the changes did not involve an unreviewed safety question. Based on the NEI guidance, I&M determined that NRC approval is not required for implementation of the above changes.

The staff has performed an audit of the material provided in the January 28th letter. Based on this audit, the staff finds the use of 10 CFR 50.59 and the NRC accepted NEI guidance on managing NRC commitments appropriate for the changes discussed. This is based on the fact that the changes affected implementation details that were beyond the higher level requirements contained in the March 14, 1983, confirmatory order.

If you have any questions regarding this matter, please contact me, at 301-415-1345.

Sincerely,

/RA/

John F. Stang, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos.: 50-315 and 50-316

cc: See next page

If you have any questions regarding this matter, please contact me, at 301-415-1345.

Sincerely,

/RA/

John F. Stang, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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