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INDIANA MICHIGAN POWER

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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
WITHDRAWAL OF COMMITMENT RELATED TO THE
DESIGN BASIS DOCUMENTATION RECONSTITUTION PROJECT

References: 1) Letter from M. W. Rencheck (I&M) to U. S. Nuclear Regulatory Commission Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, Design Basis Document Reconstitution (DBDR) Project," submittal C1099-01, dated October 25, 1999.

2) Letter from J. E. Taylor (NRC) to E. L. Draper, Jr. (I&M), "Request for Information Pursuant to 10 CFR 50.54(f) Regarding Adequacy and Availability of Design Basis Information," dated October 9, 1996.

3) Letter from E. E. Fitzpatrick (I&M) to U. S. Nuclear Regulatory Commission Document Control Desk, "Request for Information Pursuant to 10 CFR 50.54(f) Regarding Adequacy and Availability of Design Basis Information," submittal AEP:NRC:1257, dated February 6, 1997.

4) Letter from R. P. Powers (I&M) to U. S. Nuclear Regulatory Commission Document Control Desk, "Restart Plan Revision 5," Submittal AEP:NRC:1260G, dated March 12, 1999.

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5) Letter from J. E. Dyer (NRC) to R. P. Powers (I&M), "Closure of NRC Inspection Manual Chapter 0350 Restart Action Plan for Restart of the Donald C. Cook (D. C. Cook) Nuclear Plant-Unit 2," dated June 13, 2000.

6) Letter from J. A. Grobe (NRC) to R. P. Powers (I&M), "D. C. Cook Inspection Report 50-316/2000013 (DRP)," dated June 14, 2000.

7) Letter from J. E. Dyer (NRC) to R. P. Powers (I&M), "Closure of NRC Inspection Manual Chapter 0350 Oversight Panel for D. C. Cook," dated June 7, 2001.

In Reference 1, Indiana Michigan Power Company (I&M), the Licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, committed to provide the Nuclear Regulatory Commission (NRC) with a plan for completion of the Design Basis Documentation Reconstitution (DBDR) project by June 21, 2001, six months following the restart of the second unit at CNP. The purpose of this letter is to withdraw this commitment because the goals of the DBDR project have been achieved by other activities.

The NRC issued Reference 2 to request information from I&M that would provide the NRC with "added confidence and assurance that your plant(s) are operated and maintained within the design basis and any deviations are reconciled in a timely manner." I&M's response (Reference 3) informed the NRC that the DBDR project was in progress. I&M committed to complete the DBDR project by the end of 1999.

CNP Units 1 and 2 were subsequently shut down in September 1997 for an extended outage, and the DBDR Project was placed on hold in early 1999. As a result, I&M informed the NRC in Reference 1 that it was superceding the commitment made in Reference 3 with a commitment to provide a plan to complete the DBDR project within six months following restart of the second unit.

During the extended CNP shutdown, several initiatives were undertaken to identify, understand, and correct design basis issues. These include, but are not limited to, expanded system readiness reviews and programmatic readiness reviews. These reviews and the resulting corrective actions have provided reasonable assurance that the systems are capable of performing their safety and accident mitigation functions by assessing conformance with the design basis and licensing basis. The NRC was previously informed of these reviews in the

CNP Restart Plan (Reference 4). Furthermore, the NRC indicated in References 5, 6, and 7 that these readiness reviews were adequate to support restart of CNP.

When these reviews identified gaps or discrepancies with design basis information, the issues were entered into the corrective action program. The corrective actions were evaluated for risk significance. Items required for restart were completed, while others have been assigned the appropriate priority. Resolution of these corrective actions result in the creation and/or revision of controlled engineering documents containing design bases information, as appropriate. The documents are placed in I&M's document control system, which has undergone significant improvements as a result of the functional area review described in Reference 4. These improvements make the controlled documentation containing design basis information available to CNP staff.

In conclusion, the intent of the commitment made in Reference 3 was to provide added confidence and assurance that CNP is operated and maintained within the design basis, and any deviations are reconciled in a timely manner. This has been accomplished through the completed readiness reviews and related unit restart activities. Therefore, the commitment is appropriately withdrawn.

I&M does recognize, however, the need to provide plant personnel with improved access to design basis information. I&M's Business Plan includes projects to enhance the retrieval of design information, including implementation of integrated business management software. As this is considered a business process enhancement, a formal commitment to the NRC for this effort is not appropriate.

Should you have any questions, please contact Mr. Ronald W. Gaston, Manager of Regulatory Affairs, at (616) 697-5020.

Sincerely,

M. W. Rencheck
Vice President Nuclear Engineering

/bjb

c: J. E. Dyer
MDEQ - DW & RPD
NRC Resident Inspector
R. Whale