Indiana Michigan
Power Company
Cook Nuclear Plant
One Cook Plant
Bridgman, MI 49106
616 465 5901

AEP
INDIANA
MICHIGAN
POWER

November 18, 2000 C1100-15

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Mr. Geoffrey E. Grant
Director, Division of Reactor Projects
801 Warrenville Road
Lisle, IL 60532-4351

Donald C. Cook Nuclear Plant Units 1 and 2
RESOLUTION OF CONTAINMENT STRUCTURAL ISSUES

References: (1) Letter from Geoffrey E. Grant, Director, Division of Reactor Projects, U. S. Nuclear Regulatory Commission (NRC) Region III, to R. P. Powers (I&M), "Resolution of Containment Structural Issues at Donald C. Cook Nuclear Plant Units 1 and 2," dated November 3, 2000.

(2) Letter from M. W. Rencheck (I&M) to NRC Document Control Desk, "Resolution of Containment Structural Issues," dated October 15, 2000.

(3) NRC Generic Letter (GL) 91-18, Revision 1, "Information To Licensees Regarding NRC Inspection Manual Section On Resolution Of Degraded and Nonconforming Conditions," dated October 8, 1997.

Indiana Michigan Power Company (I&M), the Licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, is providing this letter in response to your letter dated November 3, 2000, (Reference 1). This letter provides details regarding the timeframe for completion of corrective actions for containment structural issues described in I&M's letter dated October 15, 2000 (Reference 2).

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As described in Reference 2, and in public meetings held on June 1, 2000, and September 27, 2000, I&M identified containment structural issues through detailed reviews of CNP Unit 2 and Unit 1 containment internal structures, which we have described generally as "discovery." This discovery effort was completed in the summer of 1999. I&M's reviews identified deficient or missing calculations needed to demonstrate conformance with Updated Final Safety Analysis Report design requirements, and to resolve physical deficiencies with certain containment subcompartment walls.

While I&M's goal was to demonstrate design basis conformance for the containment structures prior to restart of either CNP unit, this was not achievable in all cases due to the extent of the work required. Where demonstration of design basis compliance was not possible prior to restart, I&M demonstrated the operability of these structures consistent with the regulatory guidance in NRC GL 91-18 (Reference 3). These operability evaluations remain in effect while I&M continues to address the remaining containment structural design basis issues. Since these operability evaluations were based on conservative bounding evaluations and extensive calculations, I&M believes that these remaining issues are not safety significant.

I&M's corrective actions, summarized in Reference 2, are on schedule to be completed by May 15, 2001 – in advance of the next scheduled outage for either unit. These corrective actions, with the exception of the verification of some Unit 2 physical containment internal dimensions, are expected to complete the "deficiency resolution" phase of the process as described in GL 91-18. Any license amendments necessary to implement these corrective actions, a part of the "long term follow-up" phase of the process described in GL 91-18, will be submitted in a timely manner, but no later than the unit's next refueling outage. As described in Reference 2, verification of certain Unit 2 physical dimensions used as input for the design basis calculations/evaluations will be completed during containment compartment walkdowns during the next Unit 2 refueling outage (late 2001 or early 2002) or during a Unit 2 forced outage of sufficient duration during the current fuel cycle.

I&M's goal is to complete any needed design changes by the end of the next scheduled refueling outage for each unit. However, if due to their complexity, the needed design changes cannot be completed and implemented by the next refueling outage for each unit, or if the Unit 2 containment compartment walkdowns reveal additional work is needed, I&M will provide justification for the time needed to resolve these issues consistent with the guidance in GL 91-18.

I&M has performed analyses to demonstrate that the Unit 1 and 2 structures are operable. I&M is committed to ensuring that full compliance with the design and licensing basis is achieved in a timely manner. This approach is consistent with the guidance in GL 91-18. I&M will provide the NRC Project Manager with timely notice of any activities or results that will impact resolution of our containment structural issues.

Should you have any further questions, please contact Mr. Wayne J. Kropp, Director of Regulatory Affairs, at (616) 697-5056.

Sincerely,

M. W. Rencheck
Vice President Nuclear Engineering

/dmb

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