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AEP
INDIANA MICHIGAN POWER

December 6, 2001

C1201-05
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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
AMMENDED RESPONSE TO
NUCLEAR REGULATORY COMMISSION (NRC) BULLETIN 2001-01:
CIRCUMFERENTIAL CRACKING OF REACTOR PRESSURE VESSEL
HEAD PENETRATION NOZZLES
(TAC numbers MB2624 and MB2625)

References:
1) Letter from M. W. Rencheck (I&M) to NRC Document Control Desk, "Revised Response to Nuclear Regulatory Commission (NRC) Bulletin 2001-01: Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles, (TAC numbers MB2624 and MB2625)" C1001-08, dated October 12, 2001.

2) Letter from M. W. Rencheck (I&M) to NRC Document Control Desk, "Additional Information Concerning Response To Nuclear Regulatory Commission (NRC) Bulletin 2001-01: Circumferential Cracking Of Reactor Pressure Vessel Head Penetration Nozzles, (TAC numbers MB2624 and MB2625)" C1101-05, dated November 5, 2001.

This letter amends Indiana Michigan Power Company's (I&M's) response to NRC Bulletin 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles," for the Donald C. Cook Nuclear Plant (CNP).

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Reference 1 provided I&M's revised response to NRC bulletin 2001-01. In Reference 1, I&M committed to perform a remote visual examination of all accessible vessel head penetrations (VHP) under the reactor vessel head insulation and to perform eddy current testing (ECT) examination, with ultrasonic testing of relevant indications, of the VHP base material near the susceptible weld area and "J-groove" welds. These commitments were documented in the first two items of Attachment 2 to Reference 1.

In Reference 2, I&M informed the NRC staff that it would visually inspect all accessible penetrations under the insulation on top of the head, and use non-destructive techniques to examine selected penetrations from below the head. This inspection was to include examinations of all control rod drive and thermocouple penetration "J-groove" welds, and selected penetration inside diameter surfaces.

On November 30, 2001, during a telephone call between Mr. John Stang, NRC Project Manager and Mr. Scot Greenlee, CNP Director of Nuclear Technical Services, I&M made verbal commitments concerning the inspection activities for the Unit 2 reactor VHPs. In that telephone call, I&M agreed to the following:

> For each of the control rod drive mechanism and thermocouple penetrations, I&M will perform one of the following inspections:
>
> - Qualified visual examination.
> - Surface examination, ECT or liquid penetrant, of the wetted surfaces on and near the "J-groove" weld on the outside and inside diameter, supplemented by ultrasonic testing as necessary for weld locations that are not accessible by eddy current probes.
> - Ultrasonic testing from the inside diameter of the penetration capable of detecting circumferential cracks on the outside diameter above and in the vicinity of the J-groove weld.
>
> For any penetration where attached boric acid crystallization is suspected to be the result of a through-wall crack, I&M will attempt to locate circumferential cracks on the outside diameter above and in the vicinity of the "J-groove" weld using ultrasonic testing on that penetration from the inside diameter.

These inspections will be performed during the Unit 2 refueling outage commencing January 19, 2002. These commitments supercede the commitments

documented in the first two items of Attachment 2 to Reference 1 and the information concerning the inspection activity provided in Reference 2.

The first two items of Attachment 1 document the new commitments made in this letter. The other items in Attachment 1 restate the remaining commitments from Reference 1. Attachment 1, therefore, provides all I&M commitments pertaining to NRC Bulletin 2001-01.

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, Strategic Business Improvements

/dmb

Attachments

c: J. E. Dyer
MDEQ – DW & RPD, w/o attachment
NRC Resident Inspector
R. Whale, w/o attachment

AFFIRMATION

I, Michael W. Rencheck, being duly sworn, state that I am Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this document 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

M. W. Rencheck
Vice President, Strategic Business Improvements

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 6 DAY OF December, 2001

Margaret M. Sunagel
Notary Public

My Commission Expires 11/23/2005

MARGARET MARY SUNAGEL
Notary Public, Berrien County, MI
My Commission Expires Nov 23, 2005

ATTACHMENT 1 TO C1201-05

COMMITMENTS

The following table identifies those actions committed to by Indiana Michigan Power Company (I&M) in this document. Any other actions discussed in this submittal represent intended or planned actions by I&M. They are described to the Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

Commitment	Due Date
For each of the control rod drive mechanism and thermocouple penetrations, I&M will perform one of the following inspections: • Qualified visual examination • Surface examination, eddy current testing (ECT) or liquid penetrant, of the wetted surfaces on and near the "J-groove" weld on the outside and inside diameter, supplemented by ultrasonic testing as necessary for weld locations that are not accessible by eddy current probes. • Ultrasonic testing from the inside diameter of the penetration capable of detecting circumferential cracks on the outside diameter above and in the vicinity of the J-groove weld	Unit 2, Cycle 13 Refueling Outage
For any penetration where attached boric acid crystallization is suspected to be the result of a through-wall crack, I&M will attempt to locate circumferential cracks on the outside diameter above and in the vicinity of the "J-groove" weld using ultrasonic testing on that penetration from the inside diameter.	Unit 2, Cycle 13 Refueling Outage
ECT procedures will be demonstrated using calibration blocks. A demonstrated ultrasonic technique will be used for detection, as well as sizing and characterization, of any observed indications.	Unit 2, Cycle 13 Refueling Outage
Certified personnel will perform the examinations using procedures that have been developed in accordance with Donald C. Cook Nuclear Plant (CNP) or vendor's quality assurance program.	Unit 2, Cycle 13 Refueling Outage
CNP will re-examine an embedded flaw in Unit 2's penetration number 75 (repair performed in 1996) using a liquid penetrant technique to verify that there are no surface indications open to the primary water environment.	Unit 2, Cycle 13 Refueling Outage
All detected flaws will be evaluated for acceptability using the criteria contained in the vendor's flaw data handbook currently under development. This will be a revision to information contained in WCAP-14118.	Unit 2, Cycle 13 Refueling Outage
If any flaw exceeds the acceptance criteria of the vendor's handbook, it will be dispositioned for continued operation or repaired prior to returning the unit to service.	Unit 2, Cycle 13 Refueling Outage