



October 17, 2002

AEP:NRC:2900-03
10 CFR 50, Appendix K

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
SUBMITTAL OF POWER MEASUREMENT UNCERTAINTY
CALCULATION IN SUPPORT OF LICENSE AMENDMENT REQUEST
FOR APPENDIX K MEASUREMENT UNCERTAINTY RECAPTURE –
POWER UPRATE REQUEST (TAC NO. MB5498)

- REFERENCES: 1) Letter from J. E. Pollock (I&M) to Nuclear Regulatory Commission (NRC) Document Control Desk, "License Amendment Request for Appendix K Measurement Uncertainty Recapture – Power Uprate Request," AEP:NRC:2900, dated June 28, 2002
- 2) Letter from J. F. Stang (NRC) to A. C. Bakken III (I&M) "Donald C. Cook Nuclear Plant, Unit 1 – Request for Additional Information Regarding License Amendment Request, 'Power Uprate Measurement Uncertainty Recapture,' dated June 28, 2002 (TAC NOS. MB5498)," dated October 2, 2002
- 3) Letter from J. E. Pollock (I&M) to NRC Document Control Desk, "Response to Nuclear Regulatory Commission Request for additional Information Regarding License Amendment Request for Appendix K Measurement Uncertainty Recapture – Power Uprate Request (TAC No. MB5498)," dated October 15, 2002

This letter submits a proprietary calculation in support of a proposed increase in the Donald C. Cook Nuclear Plant (CNP) Unit 1 licensed reactor core power level. The attached calculation establishes the thermal power measurement uncertainty for the proposed 1.66 percent power uprate.

A-201

By Reference 1, Indiana Michigan Power Company (I&M), the licensee for CNP Unit 1, proposed to amend Facility Operating License DPR-58, including Appendix A, Technical Specifications, to allow a 1.66-percent increase in the licensed core power to 3304 MWt. By Reference 2, the NRC requested additional information regarding the changes proposed in Reference 1. I&M's response to the NRC's questions is provided by Reference 3. In response to Questions 3 and 25 of Reference 2, I&M committed to provide to the NRC a copy of the calculation that describes the methodology used to calculate the thermal power measurement uncertainty presented in Table I-1 of Attachment 3 to Reference 1. Attachment 1 to this letter satisfies that commitment by providing I&M's calculation, 1-2-O1-03 CALC 2, Revision 1, "Power Calorimetric Accuracy Using the Caldon Check Plus Feedwater Flow Measurement System and a Modified PPC CALM Program," dated September 25, 2002 (Proprietary). Attachment 2 provides the application and affidavit for withholding Attachment 1 from public disclosure in accordance with 10 CFR 2.790.

It should be noted that the thermal power uncertainty measurement calculation provided in Attachment 1 to this letter is applicable to both Unit 1 and Unit 2, although Reference 1 only requested a power uprate for CNP Unit 1. I&M plans to use this calculation to justify a measurement uncertainty recapture power uprate request for Unit 2 later this year. There are no new commitments made in this submittal.

Should you have any questions, or require additional information, please contact Mr. Brian A. McIntyre, Manager of Regulatory Affairs, at (269) 697-5806.

Sincerely,



J. E. Pollock
Site Vice President

NH/jen

Enclosure:
Notarized Oath and Affirmation Statement

Attachments:

1. Cook Nuclear Plant Calculation No. 1-2-O1-03 CALC 2, Revision 1
2. Application and Affidavit for Withholding Proprietary Information from Public Disclosure in Accordance with 10 CFR 2.790

- (b) Enhance cost-effective plant operation by justifying future operation at an uprated power level.
5. Public disclosure of this information is likely to cause harm to I&M because it would allow other companies in the nuclear industry to benefit from the results of a significant analysis program without requiring commensurate expense, or allowing I&M to recoup a portion of its expenditures, or benefit from the sale of the information as described below.

The activity that is the subject of the calculation is not specific to CNP, but rather is an activity that potentially affects the nuclear plants of other utilities.

The calculation and development of the calculation methodology was funded solely by I&M.

The cost to I&M of the calculation and development of the calculation methodology was substantial.

The methodology can easily be adapted to other nuclear plants evaluating Measurement Uncertainty Recapture Power Upgrades.

The subject information could only be duplicated by other companies or groups of companies at a similar expense to that incurred by I&M.

I&M may elect to recover a portion of the costs of this methodology development by making the information available to other utilities on a cost-sharing basis. Public disclosure of the information at this time would prevent implementation of this strategy.

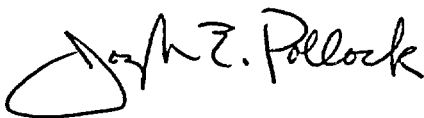
I, Joseph E. Pollock, being duly sworn, state that I am the person who subscribed my name to the foregoing statement, and that the matters and facts set forth in the statement are true to the best of my knowledge, information and belief.

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 17 DAY OF OCTOBER, 2002


Notary Public

My commission expires: 11/23/2005



Joseph E. Pollock
Site Vice President

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

ATTACHMENT 1 to AEP:NRC:2900-03

COOK NUCLEAR PLANT
CALCULATION NO. 1-2-01-03 CALC 2, REVISION 1

POWER CALORIMETRIC ACCURACY
USING THE CALDON CHECK PLUS FEEDWATER FLOW MEASUREMENT SYSTEM
AND A MODIFIED PPC CALM PROGRAM

SEPTEMBER 25, 2002

PROPRIETARY

**THIS ATTACHMENT INCLUDES INFORMATION THAT IS
PROPRIETARY TO INDIANA MICHIGAN POWER COMPANY (I&M).
THIS CALCULATION SHOULD NOT BE RELEASED OUTSIDE I&M OR THE NRC
WITHOUT PRIOR PERMISSION FROM I&M.**

AFFIRMATION

I, Joseph E. Pollock, being duly sworn, state that I am Site Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request 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.

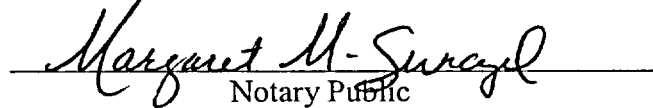
Indiana Michigan Power Company



J. E. Pollock
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 17 DAY OF OCTOBER, 2002


Notary Public

My Commission Expires 11/23/2005

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

- c: K. D. Curry – AEP Ft. Wayne, w/o attachments
 J. E. Dyer – NRC Region III
 MDEQ - DW & RPD, w/o attachments
 NRC Resident Inspector
 J. F. Stang, Jr. – NRC Washington DC
 R. Whale – MPSC, w/o attachments

bc: Without Enclosure/Attachments

G. P. Arent
A. C. Bakken, III
M. J. Finissi
S. A. Greenlee
G. J. Hill
D. W. Jenkins
J. A. Kobyra
B. A. McIntyre
J. E. Newmiller
J. E. Pollock
K. W. Riches
M. K. Scarpello
T. R. Stephens
M. G. Williams
T. K. Woods

ATTACHMENT 2 TO AEP:NRC:2900-03

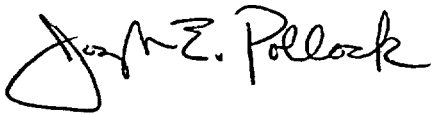
INDIANA MICHIGAN POWER COMPANY
APPLICATION AND AFFIDAVIT FOR
WITHHOLDING PROPRIETARY INFORMATION FROM
PUBLIC DISCLOSURE IN ACCORDANCE WITH 10 CFR 2.790

Application for Withholding of Proprietary Information from Public Disclosure:

Indiana Michigan Power Company (I&M) requests that the proprietary information described below be withheld from public disclosure.

The proprietary information for which withholding is requested is contained in Attachment 1 to this I&M submittal, AEP:NRC:2900-03, dated October 17, 2002. Attachment 1 is titled, "Cook Nuclear Plant Calculation No. 1-2-01-03 CALC 2, Revision 1 – Power Calorimetric Accuracy Using the Caldon Check Plus Feedwater Flow Measurement System and a Modified PPC CALM Program."

The affidavit provided following this application sets forth the basis on which the information may be withheld from public disclosure by the Nuclear Regulatory Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.790 of the Commission's regulations.

A handwritten signature in black ink, appearing to read "Joseph E. Pollock". The signature is stylized with a large, looped initial "J" and a cursive script for the rest of the name.

Joseph E. Pollock
Site Vice President

Affidavit for Withholding of Proprietary Information from Public Disclosure:

Affidavit of Joseph E. Pollock

1. I am Site Vice President for Donald C. Cook Nuclear Plant (CNP), Indiana Michigan Power Company (I&M), and as such, have the responsibility of reviewing the proprietary information sought to be withheld from public disclosure in connection with I&M's submittal AEP:NRC:2900-03, dated October 17, 2002, and am authorized to apply for its withholding on behalf of I&M.
2. I am making this affidavit in conformance with the provisions of 10 CFR 2.790 of the regulations of the Nuclear Regulatory Commission (NRC) and in conjunction with I&M's application for withholding, which accompanies this affidavit.
3. I have knowledge of the criteria used by I&M in designating information as proprietary or confidential.
4. Pursuant to the provisions of 10 CFR 2.790(b)(4), the following is being furnished for consideration by the NRC in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned by I&M and has been held in confidence by I&M.
 - (ii) The information is of a type that would customarily be held in confidence by I&M. The information consists of analysis methodology details, analysis results, supporting data, and aspects of system design, relative to an analysis that provides a competitive advantage to I&M.
 - (iii) The information is transmitted to the NRC in confidence, and under the provision of 10 CFR 2.790, it is to be received in confidence by the NRC.
 - (iv) The information sought to be protected is not available in public sources to the best of my knowledge and belief.
 - (v) The proprietary information sought to be withheld is contained in Attachment 1 to this I&M submittal, AEP:NRC:2900-03, dated October 17, 2002. Attachment 1 is titled, "Cook Nuclear Plant Calculation No. 1-2-O1-03 CALC 2, Revision 1 – Power Calorimetric Accuracy Using the Caldon Check Plus Feedwater Flow Measurement System and a Modified PPC CALM Program."

This information enables I&M to:

- (a) Justify a proposed license amendment with equipment and system performance, evaluation, and analysis information.