

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



December 6, 2002

AEP:NRC:2900-05  
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 CHANGE SHEET 2 TO POWER MEASUREMENT  
UNCERTAINTY CALCULATION IN SUPPORT OF LICENSE  
AMENDMENT REQUEST FOR APPENDIX K MEASUREMENT  
UNCERTAINTY RECAPTURE – POWER UPRATE REQUEST  
(TAC NOS. MB5498 AND MB6751)

This letter submits a change to a previously-submitted proprietary calculation in support of a proposed increase in the Donald C. Cook Nuclear Plant (CNP) Units 1 and 2 licensed reactor core power levels. The attached calculation establishes the thermal power measurement uncertainty for the proposed 1.66 percent power uprates.

By References 1 and 2, Indiana Michigan Power Company (I&M), the licensee for CNP Units 1 and 2, proposed to amend Facility Operating Licenses DPR-58 and 74, respectively, including Appendix A, Technical Specifications, to allow a 1.66-percent increase in the licensed core power for each unit. I&M provided the NRC, via Reference 3, a copy of Calculation 1-2-O1-03 CALC 2, Revision 1, Change Sheet (CS)-1, "Power Calorimetric Accuracy Using the Caldon Check Plus Feedwater Flow Measurement System and a Modified PPC CALM Program," dated September 25, 2002 (Proprietary). Details of the calculation, including CS-1, were discussed in a telephone conference with NRC staff personnel on November 27, 2002. In response to issues discussed in the November 27, 2002, telephone conference, and subsequent discussions on December 2, 4, and 5, 2002, I&M has issued CS-2 to this calculation.

AP01

Attachment 1 to this letter provides CS-2 to 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 December 5, 2002 (Proprietary), which incorporates enhancements resulting from the November 27, 2002, telephone conference. 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 establishes the basis for the core thermal power measurement uncertainty for both Unit 1 and Unit 2. I&M anticipates that future changes to this calculation would occur only as a result of Unit 2 Leading Edge Flow Meter Testing. There are no new commitments made in this submittal.

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

Sincerely,



J. E. Pollock  
Site Vice President

NH/dmb

References:

1. Letter from J. E. Pollock, I&M, to NRC Document Control Desk, "Donald C. Cook Nuclear Plant Unit 1, Docket No. 50-315, License Amendment Request for Appendix K Measurement Uncertainty Recapture - Power Uprate Request," AEP:NRC:2900, dated June 28, 2002
2. Letter from J. E. Pollock, I&M, to NRC Document Control Desk, "Donald C. Cook Nuclear Plant Unit 2, Docket No. 50-316, License Amendment Request for Appendix K Measurement Uncertainty Recapture - Power Uprate Request," AEP:NRC:2902, dated November 15, 2002

3. Letter from J. E. Pollock, I&M, to NRC Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, Submittal of Change to Power Measurement Uncertainty Calculation in Support of License Amendment Request for Appendix K Measurement Uncertainty Recapture – Power Uprate Request," AEP:NRC:2900-04, dated November 15, 2002

Enclosure:

1. Notarized Affirmation Statement

Attachments:

1. Donald C. Cook Nuclear Plant Calculation No. 1-2-01-03 CALC 2, Revision 1, Change Sheet 2, "Power Calorimetric Accuracy using the Caldon Check Plus Feedwater Flow Measurement System and a Modified PPC CALM Program"
2. Application and Affidavit for Withholding Proprietary Information from Public Disclosure in Accordance with 10 CFR 2.790

- 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  
D. R. Hafer  
N. Haggerty  
G. J. Hill  
D. W. Jenkins  
J. A. Kobyra  
B. A. McIntyre  
J. E. Newmiller  
J. E. Pollock  
D. J. Poupard  
K. W. Riches  
M. K. Scarpello  
M. G. Williams  
T. K. Woods

**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



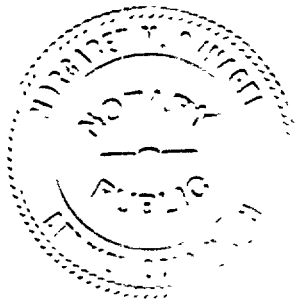
J. E. Pollock  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 6<sup>th</sup> DAY OF December, 2002

Margaret M. Swagel  
Notary Public

My Commission Expires 11/23/2005



ATTACHMENT 2 TO AEP:NRC:2900-05

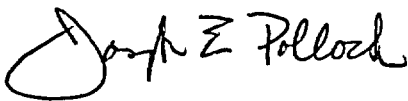
INDIANA MICHIGAN POWER COMPANY  
APPLICATION AND AFFIDAVIT FOR  
WITHHOLDING PROPRIETARY INFORMATION FROM  
PUBLIC DISCLOSURE IN ACCORDANCE WITH 10 CFR 2.790

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:2900-05, dated December 6, 2002. Attachment 1 is titled, "Cook Nuclear Plant Calculation No. 1-2-O1-03 CALC 2, Revision 1, Change Sheet 2 – 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 by 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.



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 of 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:2900-05, dated December 6, 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:2900-05, dated December 6, 2002. Attachment 1 is titled, "Cook Nuclear Plant Calculation No. 1-2-O1-03 CALC 2, Revision 1, Change Sheet 2 – 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.

- (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 uprates.

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.

Joseph E. Pollock  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 6<sup>th</sup> DAY OF December, 2002

Margaret M. Swagel  
Notary Public

My commission expires: 11/23/2005

