



March 13, 2003

AEP:NRC:2016-06

Docket No: 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 Unit 2  
REQUEST FOR NOTICE OF ENFORCEMENT DISCRETION  
FROM TECHNICAL SPECIFICATION 3.7.1.2  
LIMITING CONDITION FOR OPERATION FOR THE  
AUXILIARY FEEDWATER SYSTEM

Reference: Letter from Joseph E Pollock, Indiana Michigan Power Company, to U. S. Nuclear Regulatory Commission (NRC) Document Control Desk, "Donald C. Cook Nuclear Plant Unit 2 Request for Notice of Enforcement Discretion from Technical Specification 3.7.1.2 Limiting Condition for Operation for the Auxiliary Feedwater System," AEP:NRC:2016-05, dated March 11, 2003.

In the referenced letter, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Unit 2 (DPR-74), requested a Notice of Enforcement Discretion from Technical Specification 3.7.1.2 Limiting Condition for Operation for the auxiliary feedwater (AFW) system to complete a motor replacement for the Unit 2 West Motor Driven AFW (MDAFW) pump. I&M is submitting this letter to clarify the methods by which compensatory measures documented in Item 7 of the reference, Proposed Compensatory Measures, were implemented.

As discussed during the March 8, 2003, conference call with the NRC, no surveillance testing would be performed on plant equipment that could jeopardize plant operation (i.e., starting or stopping pumps, stroking valves, taking instrument channels out of service, etc.) during the additional time the Unit 2 West MDAFW pump was out of service. However, non-intrusive surveillance testing (i.e., rod position verification, instrument channel checks, leak rates, etc.) would be performed. I&M verified implementation of this compensatory measure by reviewing the surveillance test schedule for

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March 8, 2003, and March 9, 2003. As described in the referenced letter, the compensatory measures that precluded Unit 2 safety-related and vital secondary equipment from being removed from service for maintenance, that precluded work on shared safety significant systems, and that precluded work from being performed that could potentially jeopardize unit operation, ensured that no surveillances of this nature would be performed.

I&M has confirmed that no surveillance testing that could have jeopardized plant operation was performed during the time that the Unit 2 West MDAFW pump was out of service.

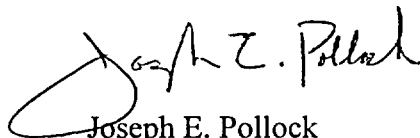
On March 12, 2003, the details of this letter were discussed with the NRC Region III Project Engineer assigned to CNP.

Copies of this letter are being transmitted to the Michigan Public Service Commission and Michigan Department of Environmental Quality, in accordance with the requirements of 10 CFR 50.91.

This submittal contains no new commitments.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph E. Pollock". The signature is fluid and cursive, with a large loop at the beginning.

Joseph E. Pollock  
Site Vice President

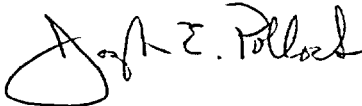
BWO/jen

c: K. D. Curry – AEP Ft. Wayne  
J. E. Dyer – NRC Region III  
J. T. King – MPSC  
MDEQ - DW & RPD  
NRC Resident Inspector  
J. F. Stang, Jr. – NRC Washington DC

**AFFIRMATION**

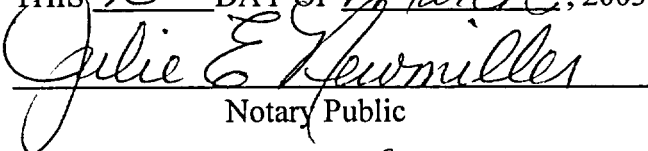
I, Joseph E. Pollock, being duly sworn, state that I am Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this Request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

Indiana Michigan Power Company



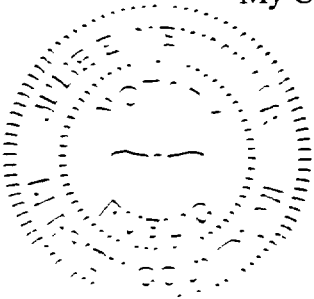
Joseph E. Pollock  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 13<sup>th</sup> DAY OF March, 2003  
  
Notary Public

JULIE E. NEWMILLER  
Notary Public, Berrien County, MI  
My Commission Expires Aug 22, 2004

My Commission Expires 8-22-2004



bc:    A. C. Bakken III  
       P. B. Cowan  
       M. J. Finissi  
       J. P. Gebbie  
       S. A. Greenlee  
       D. W. Jenkins  
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