



April 29, 2003

AEP.NRC:3311-02  
10 CFR 50.90

Docket No.: 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  
SUPPLEMENT TO RESPONSE TO NRC REQUEST FOR ADDITIONAL  
INFORMATION FOR LICENSE AMENDMENT REQUEST TO EXTEND  
REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES  
ACTUATION SYSTEM SURVEILLANCE TIME REQUIREMENTS AS  
EVALUATED IN WCAP-15376 (TAC Nos. MB6324 and MB6325)

- References: 1) Letter from H. K. Chernoff, Nuclear Regulatory Commission, to A. C. Bakken III, Indiana Michigan Power Company, "Donald C. Cook Nuclear Plant, Units 1 and 2 - Request for Additional Information Regarding, 'License Amendment Request to Extended Reactor Trip System and Engineered Safety Features Actuation System Surveillance Time Requirement as Evaluated in WCAP-15376' (TAC MB6324 and MB6325)," dated March 27, 2003.
- 2) Letter from A. C. Bakken III, Indiana Michigan Power Company, to U. S. Nuclear Regulatory Commission Document Control Desk, "Response to NRC Request for Additional Information for License Amendment Request to Extend Reactor Trip System and Engineered Safety Features Actuation System Surveillance Requirements as Evaluated in WCAP-15376 (TAC Nos. MB6324 and MB6325)," AEP:NRC:3311-01, dated April 7, 2003.
- 3) Letter from J. E. Pollock, Indiana Michigan Power Company, to U. S. Nuclear Regulatory Commission Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2 Docket Nos. 50-315 and 50-316 License Amendment Request to Extend

A001

Reactor Trip System and Engineered Safety Features Actuation System Surveillance Requirements as Evaluated in WCAP-15376," AEP:NRC:2311, dated August 30, 2002.

This letter provides supplemental information based on Nuclear Regulatory Commission (NRC) questions on Indiana Michigan Power Company's (I&M) response to NRC request for additional information for a license amendment to revise the Donald C. Cook Nuclear Plant (CNP) reactor trip system (RTS) and engineered safety features actuation system (ESFAS) surveillance requirements.

By Reference 1, the NRC requested additional information pertaining to I&M's license amendment request. I&M provided its response to the NRC request in Reference 2. After review of Reference 2, the NRC had additional questions pertaining to the response to NRC's request. This letter addresses the additional questions. Enclosure 1 provides an affirmation pertaining to the statements made in this letter. Attachment 1 identifies the commitments made in this letter. Supplemental information, as discussed with the NRC Project Manager, is provided below.

Regarding the response to NRC Question 1, I&M will include the MASTER RELAY TEST and SLAVE RELAY TEST specified in NUREG-1431, "Standard Technical Specifications Westinghouse Plants" with the conversion to Improved Standard Technical Specifications (ISTS). The current frequency for testing master relays is each train at least every other 31 days, although some of the frequencies would be changed as part of the scope of this license amendment. The current 18-month frequency for testing slave relays, as discussed in Reference 2, is consistent with frequencies for performing slave relay tests approved by the NRC for Farley Nuclear Plant in their conversion to ISTS.

The NRC questioned whether the consideration for common cause addressed in I&M's response to NRC Question 6 would be documented. In response to this question, I&M will implement procedures to document, during Operations review of conditions adverse to quality, plausible common causes for equipment failures, and to initiate testing/inspection if necessary to determine operability of affected current licensing basis equipment.

I&M's response to NRC Question 7 stated that CNP performs testing in accordance with approved procedures which do not specify a process for testing channels in bypass through the use of lifting leads or jumpering channels. The NRC questioned whether I&M was committing to prohibit testing using lifted leads or jumpers. In response to this question, I&M will prohibit routine

surveillance procedures from testing RTS analog channels in bypass through the use of lifting leads or jumpering channels.

In reference to NRC Question 8, the NRC questioned whether a post-implementation review of the Power Range Nuclear Instrumentation would provide better assurance that the instruments will remain within existing allowance for the extended period. In response to this question, I&M will establish a program to monitor and review as-found and as-left data for the Power Range Nuclear Instrument channels for a one year period, starting at implementation, to verify that the observed setpoint drift remains within the existing allowance contained in the instrument setpoint calculation

The NRC questioned whether the reliability of the CNP design of the reactor protection system is applicable to NUREG/CR-5500 and the other topical reports related to completion time, bypass time, and surveillance test interval extensions. Additional information from a review I&M is performing on reliability/availability data for the CNP reactor protection system will be provided in a subsequent letter.

The information provided in this letter consists of supporting information for the amendment request submitted by Reference 3. The information in this letter does not alter the validity of the original evaluation of significant hazards considerations performed in accordance with 10 CFR 50.92 documented in Enclosure 2 to Reference 3. The environmental assessment provided in Enclosure 2 to Reference 3 also remains valid

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

Sincerely,



A. C. Bakken III  
Senior Vice President, Nuclear Operations

KAS/rdw

Enclosure. Affirmation

Attachment: Regulatory Commitments

c: H. K. Chernoff, NRC Washington, DC  
K. D. Curry, Ft. Wayne AEP  
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, A. Christopher Bakken III, being duly sworn, state that I am Senior Vice President, Nuclear Operations of American Electric Power Service Corporation and 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.

American Electric Power Service Corporation



A. C. Bakken III  
Senior Vice President, Nuclear Operations

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 29<sup>th</sup> DAY OF April, 2003

Julie E. Newmiller  
Notary Public

My Commission Expires 8-22-2004

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



ATTACHMENT TO AEP:NRC:3311-02

REGULATORY 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 NRC's information and are not regulatory commitments.

Commitment	Date
I&M will include the MASTER RELAY TEST and SLAVE RELAY TEST specified in NUREG-1431, "Standard Technical Specifications Westinghouse Plants" with the conversion to Improved Standard Technical Specifications (ISTS).	Conversion to ISTS.
I&M will implement procedures to document, during Operations review of conditions adverse to quality, plausible common causes for equipment failures, and to initiate testing/inspection if necessary to determine operability of affected current licensing basis equipment.	The appropriate administrative controls will be established when the surveillance test interval extensions are implemented following NRC approval.
I&M will prohibit routine surveillance procedures from testing reactor trip system (RTS) analog channels in bypass through the use of lifting leads or jumpering channels.	Prior to implementing the surveillance interval extensions for the RTS channels.
I&M will establish a program to monitor and review as-found and as-left data for the Power Range Nuclear Instrument channels for a one year period, starting at implementation, to verify that the observed setpoint drift remains within the existing allowance contained in the instrument setpoint calculation.	Prior to implementing increased surveillance test intervals for the Power Range Nuclear Instruments.
Additional information from a review I&M is performing on reliability/availability data for the CNP reactor protection system will be provided in a subsequent letter.	May 2, 2003