

Indiana Michigan  
Power Company  
500 Circle Drive  
Buchanan, MI 49107 1395



January 14, 2004

AEP:NRC:4034  
10 CFR 54

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555-0001

SUBJECT: Donald C. Cook Nuclear Plant Units 1 and 2  
Docket No. 50-315 and 50-316  
Response to Nuclear Regulatory Commission (NRC) Requests  
for Additional Information (RAIs) Pertaining to the Review of  
the License Renewal Application for Donald C. Cook Nuclear  
Plant, Units 1 and 2 - Scoping and Screening Methodology and  
Results (TAC Nos. MC 1202 and MC 1203)

Dear Sir or Madam:

By letter dated October 31, 2003, Indiana Michigan Power Company submitted an application to renew the operating licenses for Donald C. Cook Nuclear Plant (CNP), Units 1 and 2.

During the conduct of its review, the NRC Staff requested clarification of the scoping and screening methodology presented in Section 2.0, "Scoping and Screening Methodology for Identifying Structures and Components Subject to Aging Management Review and Implementation Results," of the CNP License Renewal Application. This letter provides the requested clarification.

Enclosure 1 to this letter provides an affirmation pertaining to the statements made in this letter. Attachment 1 provides the clarification requested by NRC RAIs 2.1-1 and 2.1-2. There are no new commitments contained in this submittal.

Should you have any questions, please contact Mr. Richard J. Grumbir, Project Manager, License Renewal, at (269) 697-5141.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. K. Nazar', is written over the typed name and title.

M. K. Nazar  
Senior Vice President and Chief Nuclear Officer

RS/rdw

A104

Enclosures:

- 1 Affirmation

Attachments:

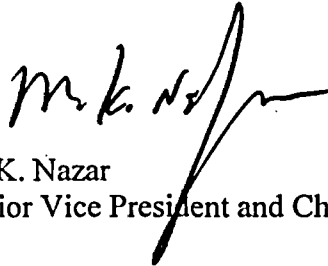
- 1 Response to Nuclear Regulatory Commission (NRC) Requests for Additional Information (RAIs) on the Scoping and Screening Methodology and Results Sections of the Donald C. Cook Nuclear Plant License Renewal Application
- c: J. H. Eads, NRC Washington DC  
J. L. Caldwell, NRC Region III  
J. T. King, MPSC  
K. D. Curry, AEP Ft. Wayne  
MDEQ – WHMD/HWRPS  
NRC Resident Inspector  
J. F. Stang, Jr., NRC Washington DC

bc: M. J. Finissi  
R. J. Grumbir  
D. W. Jenkins  
J. N. Jensen  
N. Haggerty  
B. D. Mann  
M. K. Nazar  
J. E. Newmiller  
D. J. Poupard  
K. W. Riches  
M. K. Scarpello  
T. K. Woods  
J. A. Zwolinski

**AFFIRMATION**

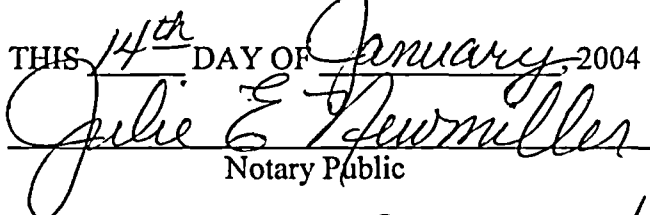
I, Mano K. Nazar, being duly sworn, state that I am Senior Vice President and Chief Nuclear Officer of American Electric Power Service Corporation and Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf 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



M. K. Nazar  
Senior Vice President and Chief Nuclear Officer

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 14<sup>th</sup> DAY OF January, 2004  
  
Notary Public

My Commission Expires 8-22-2004

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



**Response to Nuclear Regulatory Commission (NRC) Requests for Additional Information (RAIs) on the Scoping and Screening Methodology and Results Sections of the Donald C. Cook Nuclear Plant License Renewal Application**

The Donald C. Cook Nuclear Plant (CNP) scoping process discussed in response to these questions was discussed on December 18 and 19, 2003, with the NRC Project Manager for review of the CNP License Renewal Application (LRA) and the NRC Staff representative responsible for leading the review of the CNP license renewal scoping and screening process.

**RAI 2.1-1:**

*D. C. Cook Units 1 & 2 LRA Section 2.1.1 states the following with respect to the scoping methodology:*

*"Consistent with NEI 95-10, the scoping process used for the CNP license renewal project began with a list of plant systems and structures, determined the functions they perform, and then determined which functions met any of the three criteria of 10 CFR 54.4(a). Functions that meet any of the criteria are intended functions for license renewal, and the systems and structures that perform these functions are included within the scope of license renewal."*

*In order for the staff to determine that you have not omitted any structures, systems, and components that should be within the scope of license renewal according to 10 CFR 54.4(a), confirm whether you have included all the structures, systems, and components in such systems and structures within the scope of license renewal. If not, describe what structures, systems, and components you excluded from the scope of license renewal.*

**I&M Response to RAI 2.1-1:**

To provide assurance that no structures, systems, and components that should be within the scope of license renewal according to 10 CFR 54.4(a) were omitted from the CNP license renewal scope, the response to this question addresses the comprehensiveness of the CNP scoping and screening process.

All of the mechanical and electrical systems at CNP were reviewed for inclusion in the scope of license renewal. Use of the CNP facility database, a comprehensive database of plant equipment, provides assurance that all systems are reviewed for inclusion in the scope of license renewal.

As discussed in LRA Section 2.1.1, the scoping process began with a list of plant systems and structures. The functions performed by the plant systems and structures were determined, then a

determination was made as to which functions met any of the three criteria of 10 CFR 54.4(a). Functions that meet any of the criteria are intended functions for license renewal, and the systems and structures that perform these functions are included within the scope of license renewal. These systems and structures that perform intended functions are indicated in the LRA in Table 2.2-1a, Systems Within the Scope of License Renewal Mechanical Systems, Table 2.2-1b, Systems Within the Scope of License Renewal Electrical Systems (Bounding Approach), and Table 2.2-3, Structures Within the Scope of License Renewal. Systems and structures that are not within the scope of license renewal are listed in the LRA in Table 2.2-2, Systems Not Within the Scope of License Renewal, and Table 2.2-4, Structures Not Within the Scope of License Renewal. The mechanical and electrical system codes from the CNP facility database were included in LRA Tables 2.2-1a, 2.2-1b, and 2.2-2.

To ensure comprehensive consideration of structures for inclusion in the scope of license renewal, the structures listed in LRA Tables 2.2-3 and 2.2-4 were identified from a review of current licensing basis documentation, including the Updated Final Safety Analysis Report and civil/structural plant layout drawings. The current license basis documentation was used in addition to the facility database since all structures are not listed in the facility database.

Within the systems and structures in the scope of license renewal, structures, and components that are subject to aging management review (AMR) were identified in accordance with 10 CFR 54.21. All components within the systems identified in the LRA in Table 2.2-1a and Table 2.2-1b were conservatively considered to be within the scope of license renewal for the purpose of identifying components and structures that are subject to AMR. In accordance with 10 CFR 54.21(a)(1), structures and components subject to AMR are those that perform an intended function without moving parts or a change in configuration or properties and that are not subject to replacement based on a qualified life or specified time period.

In conclusion, all components within the systems identified in LRA Tables 2.2-1a and 2.2-1b, and all structures identified in LRA Table 2.2-3, were conservatively considered to be within the scope of license renewal for the purposes of identifying components and structures that are subject to AMR.

#### RAI 2.1-2:

*D. C. Cook Units 1 & 2 LRA Section 2.1.2.1.2, Identifying Components Subject to Aging Management Review, states the following: "[license] renewal drawings were created by marking mechanical flow diagrams to indicate only those components within the system evaluation boundaries that require an aging management review." However, the highlighted portions of license renewal drawings are bounded by a flag, which is defined in the legend of the drawings as the license renewal boundary. As such, the license renewal drawings indicate that the highlighted portions represent system, structures, and components are within the scope of*

*license renewal. Clarify this apparent discrepancy by confirming whether the highlighted portions represent system, structures, and components that are (1) within the scope of license renewal or (2) within the scope of license renewal and subject to AMR.*

**I&M Response to RAI 2.1-2:**

The highlighted portions of the license renewal drawings represent systems, structures, and components that are within the scope of license renewal and subject to AMR. This is not indicative of a discrepancy between the text in LRA Section 2.1.2.1.2 and the manner in which the license renewal drawings were highlighted.

LRA Section 2.1.2.1.2, "Identifying Components Subject to Aging Management Review," states the following: "[license] renewal drawings were created by marking mechanical flow diagrams to indicate only those components within the system evaluation boundaries that require an aging management review." The license renewal boundary may be defined as the separation point between the portion of the system that requires an AMR (highlighted portion) and the portion of the system that does not require an AMR.