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AEP
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POWER

March 9, 2004

AEP:NRC:4054-03
10 CFR 2.202

Docket Nos: 50-315
50-316

Secretary, Office of the Secretary of the Commission
U. S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555

Donald C. Cook Nuclear Plant Units 1 and 2
ANSWER TO REVISED NUCLEAR REGULATORY COMMISSION
ORDER ESTABLISHING INTERIM INSPECTION REQUIREMENTS FOR
REACTOR PRESSURE VESSEL HEADS AT
PRESSURIZED WATER REACTORS

References: U. S. Nuclear Regulatory Commission Order EA-03-009, "Issuance of First Revised NRC Order (EA-03-009) Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors," dated February 20, 2004.

This letter transmits Indiana Michigan Power Company's (I&M's) answer to a revised Nuclear Regulatory Commission (NRC) order establishing interim inspection requirements for reactor pressure vessel heads at pressurized water reactors.

The revised NRC order (referenced above) imposes enhanced requirements for inspection of pressurized water reactor pressure vessel heads and related penetration nozzles. Section V of the revised order requires that, within twenty days of its date of issuance, licensees submit an answer to the revised order, either consenting to the revised order or setting forth reasons as to why the revised order should not have been issued. The revised order also requires that licensees include notification if (1) they are unable to comply with any of the inspection requirements, or (2) compliance with any of the inspection requirements is unnecessary. The revised order further states that licensees

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proposing to deviate from the inspection requirements may request that the Director, Office of Nuclear Reactor Regulation, relax conditions of the order.

Consent to Order and Anticipated Relaxation Requests

Pursuant to Section V of the revised order, I&M, the licensee for Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2, hereby consents to the revised order. I&M is unable to comply with the requirements identified below and/or considers compliance with the requirements to be unnecessary, and has provided a brief description of the reason. I&M plans to request relaxation of these requirements by proposing alternative inspection requirements, similar to those approved for the original order, that will provide an acceptable level of quality and safety.

- Section IV.C(5)(b)(i) of the revised order requires that ultrasonic testing of each reactor pressure vessel head penetration nozzle extend two inches below the lowest point on the toe of the J-groove weld, or extend one inch below the lowest point on the toe of the J-groove weld and include nozzle surfaces having an operating stress level of 20,000 pounds per square inch and greater. However, due to the geometry of the probes used for such examinations and/or the presence of threads on the outside surface of the nozzles at CNP, the lowest portions of the nozzles cannot be effectively examined ultrasonically. As a result, for some nozzles, the minimum distance below the toe of the J-groove weld that can be ultrasonically examined is less than one inch.

- Section IV.C(5)(b)(ii) of the revised order requires that eddy current or dye penetrant testing of the wetted surface of each reactor pressure vessel head penetration nozzle base material extend two inches below the lowest point on the toe of the J-groove weld, or extend one inch below the lowest point on the toe of the J-groove weld and include nozzle surfaces having an operating stress level of 20,000 pounds per square inch or greater. However, the outside surface of each nozzle is threaded at the lower end at CNP, and some nozzles have a guide funnel screwed onto these threads. Eddy current or dye penetrant testing of the threaded surfaces and the surfaces inside the guide funnel is not possible, or is not possible without significant personnel radiation exposure. As a result, for some nozzles, the minimum distance on the outside diameter surface below the toe of the J-groove weld that can be eddy current or dye penetrant tested is less than one inch.

I&M plans to request relaxation of the above identified requirements in accordance with Section IV.F of the order by May 1, 2004, to support the Fall 2004 Unit 2 refueling outage.

This letter contains no new commitments. Should you have any questions, please contact Mr. John A. Zwolinski, Director of Design Engineering and Regulatory Affairs, at (269) 697-5007.

Sincerely,

Joseph N. Jensen
Site Vice President

JRW/rdw

c: Assistant General Counsel for Materials Litigation and Enforcement, NRC
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NRC Resident Inspector
J. F. Stang, Jr., NRC Washington, DC

AFFIRMATION

I, Joseph N. Jensen, 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

Joseph N. Jensen
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 9th DAY OF March, 2004

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