



June 28, 2004

AEP:NRC:4054-02  
10 CFR 50.54(f)

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  
CLARIFICATION - RESPONSE TO NUCLEAR REGULATORY  
COMMISSION BULLETIN 2003-01 REGARDING DEBRIS BLOCKAGE OF  
RECIRCULATION SUMP

- Reference: 1) Letter from A. C. Bakken III, Indiana Michigan Power Company (I&M), to U. S. Nuclear Regulatory Commission (NRC) Document Control Desk, "Response to Nuclear Regulatory Commission Bulletin 2003-01 Regarding Debris Blockage of Recirculation Sump," AEP:NRC:3054-12, dated August 7, 2003.
- 2) NRC Bulletin 2003-01, "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors," dated June 9, 2003.

This letter clarifies the description of certain foreign material controls contained in I&M's response to an NRC bulletin.

Reference 1 provided I&M's response to NRC Bulletin 2003-01 (Reference 2) regarding debris blockage of recirculation sumps. The description of containment foreign material controls on Page 5 of the attachment to Reference 1 stated that the ice condenser is treated as a high risk foreign material exclusion (FME) area. During an NRC inspection conducted in January 2004, it was noted that this description appeared to be inconsistent with the controls being implemented in accordance with plant procedures. As documented in the associated Inspection Report, work in the lower plenum during outages in

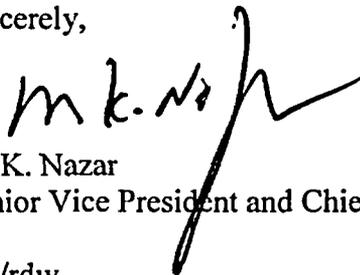
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May 2003 (Unit 2) and November 2003 (Unit 1) was categorized "standard risk" for FME. The Inspector noted: "This did not significantly affect FME controls; in fact, the purpose of these work activities was to find and remove foreign materials from the ice condensers." The NRC Inspector stated that he had no concerns regarding the adequacy of the FME controls being implemented. The intent of this letter is to respond to the Inspector's observation and clarify the methods employed by I&M to provide FME controls for the ice condenser.

The description of ice condenser FME controls provided in Reference 2 is clarified as follows. The ice condenser consists of three main sections. These three sections are, from top to bottom, the upper plenum, the ice bed, and the lower plenum. The upper plenum is separated from the ice bed by horizontal doors called intermediate deck doors. With the intermediate deck doors closed, the upper plenum is treated as a standard risk FME area because foreign material can be readily observed and removed from the area. With an intermediate deck door open or removed, the ice bed underneath the door is exposed. As a minimum, the upper plenum area around an open or removed intermediate deck door, and the exposed ice bed, are treated as a high risk FME area, since foreign material can not be readily observed and removed from the ice bed. The lower plenum is normally treated as a standard risk FME area at all times because foreign material can be readily observed and removed from the area.

This letter contains no new commitments. Should you have any questions, please contact Mr. John A. Zwolinski, Safety Assurance Director, at (269) 466-2428.

Sincerely,

A handwritten signature in black ink, appearing to read "M. K. Nazar", with a long, sweeping underline that extends to the right.

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

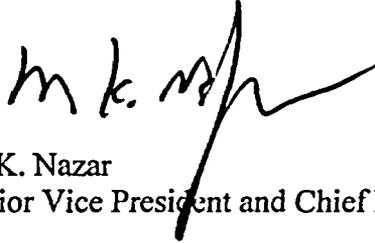
JW/rdw

c: J. L. Caldwell, NRC Region III  
K. D. Curry, Ft. Wayne AEP  
Director, Office of Nuclear Reactor Regulation  
J. T. King, MPSC  
J. G. Lamb, NRC Washington DC  
MDEQ – WHMD/HWRPS  
NRC Resident Inspector

**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 response 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.

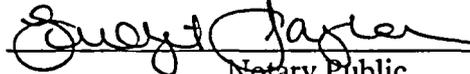
American Electric Power Service Corporation



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

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 28<sup>th</sup> DAY OF June, 2004

  
\_\_\_\_\_  
Notary Public

My Commission Expires 6/10/2007



BRIDGET TAYLOR  
Notary Public - Michigan  
Berrien County  
My Commission Expires  
June 10, 2007