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December 19, 2005

AEP:NRC:5054-14  
10 CFR 50.54(f)

Docket Nos.: 50-315  
50-316

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Donald C. Cook Nuclear Plant Units 1 and 2  
NUCLEAR REGULATORY COMMISSION GENERIC LETTER 2004-02  
REVISION OF COMMITMENTS

- References:
1. Nuclear Regulatory Commission (NRC) Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," dated September 13, 2004 (ML042360586).
  2. Letter from J. N. Jensen, Indiana Michigan Power Company, to NRC Document Control Desk, "Nuclear Regulatory Commission Generic Letter 2004-02 – Information Requested by September 1, 2005," AEP:NRC:5054-11, dated August 31, 2005 (ML052510512).

By Generic Letter 2004-02 (Reference 1), the Nuclear Regulatory Commission (NRC) requested that pressurized water reactor licensees evaluate the potential for post-accident debris to impede or prevent the recirculation functions of emergency core cooling and containment spray systems. Indiana Michigan Power Company's (I&M's) response to Generic Letter 2004-02 for the Donald C. Cook Nuclear Plant was transmitted by Reference 2. In that response, I&M committed to complete the final acceptance reviews of a Westinghouse baseline evaluation summary report by December 31, 2005. I&M also committed to submit any required license amendment requests by December 31, 2005. This letter revises those commitments. The revision of these commitments does not affect I&M's intention to achieve full compliance with the requirements identified in the Applicable Requirements Section of the generic letter by December 31, 2007, as requested in the generic letter.

Attachment 1 to this letter provides the revised commitments and associated background information. Attachment 2 provides the revised commitments in tabular form.

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Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Supervisor, at (269) 466-2649.

Sincerely,



Joseph N. Jensen  
Site Vice President

JW/rdw

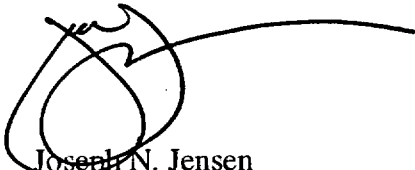
Attachments:

1. NRC Generic Letter 2004-02 Commitment Revisions
  2. Regulatory Commitments
- c:
- J. L. Caldwell, NRC Region III
  - K. D. Curry, Ft. Wayne AEP, w/o attachments
  - J. T. King, MPSC
  - MDEQ – WHMD/RPMWS
  - NRC Resident Inspector
  - P. S. Tam, 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 letter 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.

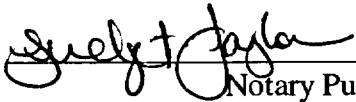
Indiana Michigan Power Company



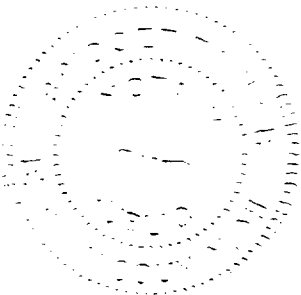
Joseph N. Jensen  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 19<sup>th</sup> DAY OF December, 2005

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

My Commission Expires 6/10/2007



## ATTACHMENT 1 TO AEP:NRC:5054-14

### NRC GENERIC LETTER 2004-02 COMMITMENT REVISIONS

References for this attachment are identified on Page 3 and Page 4.

By Generic Letter 2004-02 (Reference 1), the U. S. Nuclear Regulatory Commission (NRC) requested that pressurized water reactor licensees evaluate the potential for post-accident debris to impede or prevent the recirculation functions of emergency core cooling and containment spray systems. Indiana Michigan Power Company's (I&M's) response to Generic Letter 2004-02 for the Donald C. Cook Nuclear Plant (CNP) was transmitted by Reference 2. In that response, I&M provided several commitments regarding actions that would be taken to address the concerns identified in the generic letter. I&M has determined that two of these commitments must be revised. The commitments to be revised were contained in the responses to Requested Information Items 2(c) and 2(e) of the generic letter. The revisions to these two commitments are described below.

#### Requested Information Item 2(c) Commitment

In Requested Information Item 2(c) of the generic letter, the NRC requested that licensees provide:

*A description of the methodology that was used to perform the analysis of the susceptibility of the ECCS and CSS recirculation functions to the adverse effects of post-accident debris blockage and operation with debris-laden fluids. The submittal may reference a guidance document (e.g., Regulatory Guide 1.82, Rev. 3, industry guidance) or other methodology previously submitted to the NRC. (The submittal may also reference the response to Item 1 of the Requested Information described above. The documents to be submitted or referenced should include the results of any supporting containment walkdown surveillance performed to identify potential debris sources and other pertinent containment characteristics.)*

I&M's response to Item 2(c) identified Westinghouse Electric Corporation (Westinghouse) as the lead organization in the contractor team assembled to perform the required analyses and evaluations. I&M's response stated that Westinghouse would provide I&M with a summary report of the baseline evaluation, and that I&M would then perform an Owner's Acceptance Review of the summary report. I&M committed to have the final Westinghouse baseline summary report and I&M acceptance reviews completed no later than December 31, 2005. However, Westinghouse actions necessary to address the results of ongoing industry initiatives and address the results of I&M reviews will take longer than expected. Therefore, the final Westinghouse baseline summary report and I&M acceptance reviews will be completed no later than March 17, 2006.

Requested Information Item 2(e) Commitment

In Requested Information Item 2(e) of the generic letter, the NRC requested that licensees provide:

*A general description of and planned schedule for any changes to the plant licensing bases resulting from any analysis or plant modifications made to ensure compliance with the regulatory requirements listed in the Applicable Regulatory Requirements section of this generic letter. Any licensing actions or exemption requests needed to support changes to the plant licensing basis should be included.*

The regulatory requirements listed in the Applicable Regulatory Requirements section of the generic letter are:

- 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light-Water Nuclear Power Reactors,"
- 10 CFR 50.67, "Accident Source Term,"
- 10 CFR 100, "Reactor Site Criteria," and

The following General Design Criteria (GDC) in 10 CFR 50, Appendix A, or for plants not licensed to the GDC, similar requirements in their licensing basis:

- Criterion 35, "Emergency Core Cooling,"
- Criterion 38, "Containment Heat Removal," and
- Criterion 41, "Containment Atmosphere Cleanup."

I&M's response to Item 2(e) identified a potential license amendment request to change certain Technical Specification (TS) Surveillance Requirements involving inspection of recirculation sump related components. I&M committed to complete its evaluation of the need for a license amendment and submit any required license amendment requests by December 31, 2005.

Currently, I&M has not identified any license amendments that will be needed to ensure compliance with the regulatory requirements identified in the Applicable Regulatory Requirements section of the generic letter. However, I&M has determined that a license amendment may be needed to comply with 10 CFR 50.36, which governs the content of the TS. Regulation 10 CFR 50.36(c)(2)(ii)(C) requires that TS Limiting Conditions for Operation (LCOs) be established for:

*A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

I&M's response to the generic letter described the planned refined evaluation demonstrating compliance with the regulatory requirements listed in the Applicable Regulatory Requirements section of the generic letter following planned plant modifications. I&M has determined that the refined evaluation will likely need to credit flowpaths, not currently addressed in the CNP TS, that would supply liquid to the recirculation sump following a loss of coolant accident. Regulation 10 CFR 50.36(c)(2)(ii)(C) would require that LCOs be established for these flowpaths if the refined evaluation determines they must function to mitigate a design basis loss of coolant accident. The refined evaluation for Unit 1 (and potentially, Unit 2) is expected to be complete shortly before the Fall 2006 Unit 1 refueling outage. If a separate refined evaluation is performed for Unit 2, it would be completed prior to the Fall 2007 Unit 2 refueling outage.

Consistent with established regulatory processes, I&M considers it appropriate to submit an amendment request only upon completion of a supporting refined evaluation that quantitatively demonstrates the need for, and adequacy of, additional flow paths to the recirculation sump. Accordingly, I&M will submit Unit 1 and Unit 2 amendment requests within 60 days following completion of their respective refined evaluations if the respective refined evaluation demonstrates the need for a license amendment. I&M will notify the NRC Licensing Project Manager upon completion of the refined evaluation(s), thereby establishing the start date(s) for the 60 day period(s).

If a respective refined evaluation demonstrates the need for additional flowpaths, I&M will establish administrative controls, consistent with NRC Administrative Letter 98-10 (Reference 3) to specify operability, action, and surveillance requirements for the flow paths, thereby assuring safety while the respective amendment request is under NRC review. These administrative controls would be contained in the CNP Unit 1 and Unit 2 Technical Requirements Manuals. The Unit 1 and Unit 2 plant modifications that support the refined evaluation are scheduled for the respective refueling outages in the Fall of 2006 and the Fall of 2007. Therefore, the administrative requirements will be implemented for Unit 1 upon completion of the Fall 2006 refueling outage. The administrative requirements will be implemented for Unit 2 upon completion of the Fall 2007 refueling outage if the Unit 2 amendment request remains under review at that time.

#### References for this Attachment

1. NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," dated September 13, 2004 (ML042360586).

2. Letter from J. N. Jensen, I&M, to NRC Document Control Desk, "Nuclear Regulatory Commission Generic Letter 2004-02 – Information Requested by September 1, 2005," AEP:NRC:5054-11, dated August 31, 2005 (ML052510512).
3. NRC Administrative letter 98-10, "Dispositioning of Technical Specifications that are Insufficient to Assure Plant Safety," dated December 29, 1998 (ML031110108).

ATTACHMENT 2 TO AEP:NRC:5054-14

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 the NRC's information and are not regulatory commitments.

<b>Commitment</b>	<b>Date</b>
I&M will complete the final acceptance reviews of the Westinghouse summary report.	March 17, 2006
I&M will submit Unit 1 amendment requests if the refined evaluation demonstrates the need for a license amendment pursuant to 10 CFR 50.36.	Within 60 days following completion of the Unit 1 refined evaluation.
I&M will submit Unit 2 amendment requests if the refined evaluation demonstrates the need for a license amendment pursuant to 10 CFR 50.36.	Within 60 days following completion of the Unit 2 refined evaluation.
I&M will notify the NRC Licensing Project Manager upon completion of the Unit 1 refined evaluation, thereby establishing the start date for the 60 day period.	Upon completion of the Unit 1 refined evaluation.
I&M will notify the NRC Licensing Project Manager upon completion of the Unit 2 refined evaluation, thereby establishing the start date for the 60 day period.	Upon completion of the Unit 2 refined evaluation.
If the Unit 1 refined evaluation demonstrates the need for these additional flowpaths, I&M will establish administrative controls, consistent with NRC Administrative Letter 98-10 to specify operability, action, and surveillance requirements for the flow paths, while the above identified amendment request is under NRC review. These administrative controls will be contained in the Donald C. Cook Nuclear Plant (CNP) Unit 1 Technical Requirements Manual.	Upon completion of the Fall 2006 Unit 1 refueling outage.



<b>Commitment</b>	<b>Date</b>
If the Unit 2 refined evaluation demonstrates the need for these additional flowpaths, I&M will establish administrative controls, consistent with NRC Administrative Letter 98-10 to specify operability, action, and surveillance requirements for the flow paths, while the above identified amendment request is under NRC review. These administrative controls will be contained in the CNP Unit 2 Technical Requirements Manual.	Upon completion of the Fall 2007 Unit 2 refueling outage if the amendment request remains under review at that time.