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A unit of American Electric Power

Indiana Michigan Power
Cook Nuclear Plant
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Bridgman, MI 49106
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July 28, 2006

AEP:NRC:6055-13
10 CFR 50.55a

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
RISK-INFORMED INSERVICE INSPECTION PROGRAM
COMMITMENT DUE DATE EXTENSION
(TAC Nos. MC8569 and MC8570)

- References:
1. Letter from Daniel P. Fadel, Indiana Michigan Power Company (I&M), to U. S. Nuclear Regulatory Commission (NRC) Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, Proposed Alternative to the American Society of Mechanical Engineers Code Section XI Weld Inspection Requirements," AEP:NRC:5055-10, Accession Number ML052780450, dated September 22, 2005.
 2. Letter from Daniel P. Fadel, I&M, to NRC Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, Commitment Due Date Extension, AEP:NRC:5055-15, Accession Number ML060090295, dated December 28, 2005.
 3. Letter from L. Raghavan, NRC, to Mano K. Nazar, I&M, "Donald C. Cook Nuclear Plant, Units 1 and 2 (DCCNP-1 and DCCNP-2) – Relief Request ISIR-19 Regarding Class 1 and 2 Piping Weld Inspection Requirements (TAC Nos. MC8569 and MC8570)," Accession Number ML060820513, dated May 31, 2006.

In Reference 1, Indiana Michigan Power Company (I&M) proposed an alternative to the American Society of Mechanical Engineers Code, Section XI (ASME Code) requirements for the minimum number of Class 1 and 2 piping welds to be examined during the next Unit 1 and Unit 2 refueling outages. The proposal was requested because of I&M's intention to adopt a risk-informed inservice inspection (RI-ISI) program during the current third ten-year inservice inspection interval. The RI-ISI program, when implemented, would reduce the number of welds requiring examination. I&M committed to submit the RI-ISI program by December 31, 2005.

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In Reference 2, I&M revised its commitment to submit the RI-ISI program from December 31, 2005, to July 31, 2006. As noted in the Reference 2 revision, I&M's RI-ISI program is to be based on Code Case N-716, and the Grand Gulf Nuclear Station is the pilot plant for a Code Case N-716 based RI-ISI program. The Grand Gulf program is presently scheduled to be submitted by July 31, 2006. Therefore, I&M is revising its commitment date.

The attachment to this letter provides I&M's revised commitment.

In addition to informing the NRC of the commitment date extension, I&M is requesting clarification of a statement contained in the letter approving I&M's proposed alternative, Reference 3. Page 5 of the Safety Evaluation Report contains the following statement:

"If the NRC [U. S. Nuclear Regulatory Commission] staff does not approve the DCCNP-1 and DCCNP-2 RI-ISI program by 6 months prior to the first outage of the third period, the licensee will be required to complete the remaining ASME Code-required piping examinations during the third period at each unit."

I&M understands that if the RI-ISI program is not approved by the NRC, additional ASME Code-required weld examinations will have to be performed by the end of the third ten-year inspection interval. However, the above statement implies that if the RI-ISI program is approved less than six months prior to the first outage of the third period, I&M would still be required to perform the remaining ASME Code-required piping examinations. Based on a July 20, 2006, telephone conversation with NRC personnel, it is I&M's understanding that the statement should read:

"If the NRC staff does not approve the DCCNP-1 and DCCNP-2 RI-ISI program, the licensee will be required to complete the remaining ASME Code required piping examinations during the third period at each unit."

I&M requests clarification of this issue prior to March 1, 2007, as this date is approximately six months prior to the first outage of the third period.

Should you have any questions, please contact Ms. Susan D. Simpson, Regulatory Affairs Manager, at (269) 466-2428.

Sincerely,



Joseph M. Jensen
Site Support Services Vice President

RV/rdw

Attachment: Regulatory Commitment

- c: R. Aben – Department of Labor and Economic Growth
- J. L. Caldwell – NRC Region III
- K. D. Curry – AEP Ft. Wayne, w/o attachment
- J. T. King – MPSC, w/o attachment
- MDEQ – WHMD/RPMWS, w/o attachment
- NRC Resident Inspector
- P. S. Tam – NRC Washington DC

Attachment to AEP:NRC:6055-13

Regulatory Commitment

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.

Commitment	Date
I&M will develop and submit a risk-informed inservice inspection program for NRC approval.	September 30, 2006