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**Indiana Michigan Power**  
Cook Nuclear Plant  
One Cook Place  
Bridgman, MI 49106  
AEP.com

December 19, 2006

AEP:NRC:6054-07  
10 CFR 50.54(f)

Docket Nos.: 50-315  
50-316

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

Donald C. Cook Nuclear Plant Units 1 and 2  
REVISION OF COMMITMENT FOR UPDATE OF RESPONSE TO  
REQUEST FOR ADDITIONAL INFORMATION REGARDING  
NUCLEAR REGULATORY COMMISSION GENERIC LETTER 2004-02

This letter provides a revised commitment to submit additional information regarding the effect of post-accident debris on emergency core cooling system recirculation functions. References for this letter are identified in Attachment 1.

By Generic Letter (GL) 2004-02 (Reference 1), the Nuclear Regulatory Commission (NRC) requested that pressurized water reactor (PWR) 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) responses to GL 2004-02 for the Donald C. Cook Nuclear Plant (CNP) were transmitted by References 2, 3, and 4. Reference 5 transmitted an NRC Request for Additional Information (RAI) regarding the information provided in References 2, 3, and 4. Similar RAIs were transmitted to other PWR licensees. By Reference 6, I&M provided updated information regarding its previous responses and provided a portion of the information requested in the CNP RAI. I&M committed, in Reference 6, to provide the remainder of the information requested in the CNP RAI in updates to be submitted by December 31, 2006, and December 31, 2007. I&M also identified certain other information that it intended to provide in these updates.

By Reference 7, the NRC informed the Nuclear Energy Institute that it did not expect licensees that had not completed supporting evaluations by December 31, 2006, to submit partial responses to their RAI by that date. The NRC stated that it expected each PWR licensee to submit a complete supplemental response in 2007 as soon as the information and analysis results are available, and expected all responses to be provided no later than December 31, 2007. The NRC

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further stated that it planned to communicate this information to each PWR licensee by separate correspondence. Internal NRC correspondence (Reference 8) documented a copy of the letter to be distributed to PWR licensees, containing the above information transmitted by Reference 7.

Consistent with References 7 and 8, I&M no longer intends to submit updated information regarding the RAI or other GL 2004 issues by December 31, 2006. The commitment made in Reference 6 is hereby revised to be as follows:

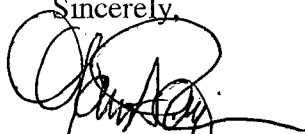
The remainder of the information requested in the letter from P. S. Tam, NRC, to M. K. Nazar, I&M, dated February 9, 2006 (ML060370547), will be provided in future update(s) within 60 days after all information and supporting analysis results are available, but no later than December 31, 2007.

Attachment 2 to this letter provides the revised commitment in tabular form.

Additionally, the NRC acknowledged in References 7 and 8 that some licensees have received approval to extend completion of GL 2004-02 corrective actions past December 31, 2007, to allow installation of certain equipment in spring 2008. The NRC stated in References 7 and 8 that it expects that the design of such equipment to have occurred in time to support a complete GL 2004-02 response by December 31, 2007. The NRC further stated that, if any substantive GL 2004-02 corrective action analytical results or technical details change in 2008 (e.g., during an outage in which GL 2004-02 corrective action modifications are completed), it expects that the facility GL 2004-02 response will be appropriately updated within 90 days of the change or outage completion. I&M has received NRC approval (Reference 9) to extend completion of certain GL 2004-02 corrective actions past December 31, 2007, and intends to meet the above described NRC expectations.

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

Sincerely,



Mark A. Peifer  
Site Vice President

JRW/rdw

Attachments:

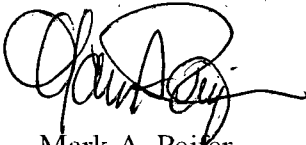
1. References
2. Regulatory Commitments

c: J. L. Caldwell – NRC Region III  
K. D. Curry – AEP Ft. Wayne  
J. T. King – MPSC  
MDEQ – WHMD/RPMWS  
NRC Resident Inspector  
P. S. Tam – NRC Washington, DC

**AFFIRMATION**

I, Mark A. Peifer, 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



Mark A. Peifer  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 19<sup>th</sup> DAY OF December, 2006

Regan D. Wendzel  
Notary Public

My Commission Expires REGAN D. WENZEL  
Notary Public, Berrien County, MI  
My Commission Expires Jan. 21, 2009

ATTACHMENT 1 TO AEP:NRC:6054-07

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 D. P. Fadel, Indiana Michigan Power Company (I&M), to NRC Document Control Desk, "90 Day Response to Nuclear Regulatory Commission Generic Letter 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors," AEP:NRC:5054-04, dated March 4, 2005 (ML050750069).
3. 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).
4. Letter from J. N. Jensen, I&M, to NRC Document Control Desk, "Nuclear Regulatory Commission Generic Letter 2004-02 – Revision of Commitments," AEP:NRC:5054-14, dated December 19, 2005 (ML060030459).
5. Letter from P. S. Tam, NRC, to M. K. Nazar, I&M, "Donald C. Cook Nuclear Plant, Units 1 and 2 - Request for Additional Information Re: Response to Generic Letter 2004-02, 'Potential Impact of Debris Blockage on Emergency Recirculation During Design-Basis Accidents at Pressurized-Water Reactors' (TAC Nos. MC4679 and MC4680)," dated February 9, 2006 (ML060370547).
6. Letter from J. N. Jensen, I&M, to NRC Document Control Desk, "Update to Response to Nuclear Regulatory Commission Generic Letter 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors," AEP:NRC:6054-05, dated June 27, 2006 (ML061860257).
7. Letter from J. A. Grobe, NRC, to A. R. Petrangelo, Nuclear Energy Institute, "Nuclear Regulatory Commission Request for Additional Information to Pressurized Water Reactor Licensees Regarding Responses to Generic Letter 2004-02," dated March 28, 2006 (ML063110263).
8. Memorandum from C. P. Jackson, NRC to C. Haney, NRC, "Letter to PWR Licensees Regarding Alternate Approach for Responding to the Request for Additional Information Letter Regarding Generic Letter 2004-02," dated December 6, 2006 (ML063390024).
9. Letter from P. S. Tam, NRC, to M. K. Nazar, I&M, "Donald C. Cook Nuclear Plant, Unit 1 (DCCNP-1) - Extension of Completion Date for Actions in Response to Generic Letter 2004-02 (TAC No. MC4679)," dated July 28, 2006 (ML062020768).

ATTACHMENT 2 TO AEP:NRC:6054-07

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>
The remainder of the information requested in the letter from P. S. Tam, NRC, to M. K. Nazar, I&M, dated February 9, 2006 (ML060370547), will be provided in future update(s).	Within 60 days after all information and supporting analysis results are available, but no later than December 31, 2007.