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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
PROPOSED ALTERNATIVE TO THE
AMERICAN SOCIETY OF MECHANICAL ENGINEERS CODE, SECTION XI
CONTAINMENT INSERVICE INSPECTION PROGRAM

Pursuant to 10 CFR 50.55a(a)(3)(i), Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant Units 1 and 2, is proposing an alternative to the containment inservice inspection (CISI) requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI. Specifically, I&M is requesting an extension of the current CISI interval. The proposed alternative is provided in the attachment to this letter.

I&M requests approval of the proposed alternative by March 31, 2008, to ensure that approval is received prior to the end of the current CISI interval that ends September 8, 2008. There are no new commitments identified in this letter. Should you have any questions, please contact Ms. Susan D. Simpson, Regulatory Affairs Manager, at (269) 466-2428.

Sincerely,

Joseph N. Jensen
Site Vice President

RV/rdw

A047
NRR

Attachment: 10 CFR 50.55a Relief Request – CISIR-06, Proposed Alternative for Containment Inspection Interval Extension in Accordance with 10 CFR 50.55a(a)(3)(i)

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

10 CFR 50.55a Relief Request – CISIR-06
Proposed Alternative for Containment Inspection Interval Extension in Accordance with 10 CFR 50.55a(a)(3)(i)

1.0 ASME CODE COMPONENTS AFFECTED

Code Class:	MC / CC
Code Reference:	IWA-2430(d) IWA-2432
Examination Category:	All under Subsection IWE and IWL[1]
Item Number:	All under Subsection IWE and IWL[1]
Description:	Class MC pressure retaining components, metallic shell and penetration liners of Class CC components, and reinforced concrete of Class CC components.
Component Number:	All Class MC and CC Components

[1]Note: Applicability to Subsection IWL is limited to the referencing of the Code of Record in program documents and update of program procedures to the new code requirements. Subsection IWL inspection frequencies will remain unchanged.

2.0 APPLICABLE CODE EDITION AND ADDENDA

American Society of Mechanical Engineers Code, Section XI, 1992 Edition and 1992 Addenda

3.0 APPLICABLE CODE REQUIREMENTS

Paragraph IWA-2430(d) states "For components inspected under Program B, each of the inspection intervals may be extended or decreased by as much as 1 year. Adjustments shall not cause successive intervals to be altered by more than one year from the original pattern of intervals."

Paragraph IWA-2432 states "The inspection intervals shall comply with the following, except as modified by IWA-2430(d):

1st Inspection Interval – 10 years following initial start of plant commercial service

Successive Inspection Intervals – 10 years following the previous inspection interval"

4.0 REASON FOR REQUEST

Indiana and Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, is requesting an extension of the current Containment Inservice Inspection (CISI) Interval to enable CNP's CISI and Inservice Inspection (ISI) Intervals to coincide. The proposed extension will eliminate the burden associated with maintaining two programs having different code requirements because of a difference in the starting dates of their respective intervals.

5.0 PROPOSED ALTERNATIVE AND BASIS FOR USE

As an alternative to the requirements of IWA-2430(d) and IWA-2432, I&M proposes extending the first interval for the CISI Program approximately 18 months from September 9, 2008, to March 1, 2010, to achieve a common interval start date and a common ISI code with the ISI Program. The start date for the Fourth Ten-Year ISI Interval and the Second Ten-Year CISI Interval will be March 1, 2010. As required by 10 CFR 50.55a(g)(4)(ii), the Code of Record for the updated (2010) ISI and CISI programs (IWE and IWL components) will be the latest edition incorporated by reference in 10 CFR 50.55a(b)(2) twelve months prior to March 1, 2010.

All originally scheduled First CISI Interval examinations will be completed prior to the extended period. Additional examinations will be performed in accordance with the First CISI interval requirements to bridge the gap between the inspection intervals. The Subsection IWE general visual examination of accessible surfaces (Examination Category E-A, Item No. E1.11), the VT-3 visual examination of moisture barriers (Examination Category E-D, Item No. E5.30), and the VT-1 visual examinations of bolting during maintenance disassemblies (Examination Category E-G, Item No. E8.10, Note 2) will be performed during Unit 1 and Unit 2 outages in the extended period. There are no Augmented Examination areas for either Unit 1 or Unit 2.

The examinations performed in the 18-month extended period for Subsection IWE components will equal the number of examinations normally performed in a code-specified 36-month inspection period. One hundred percent of accessible surfaces and moisture barriers will be visually examined along with the visual examination of the percentage of bolting specified in IWE-2412 for the first inspection period. The current schedule of Class CC examinations performed under Subsection IWL requirements remains unchanged. The additional examinations in the extended period are separate and will not be credited to the Second CISI program inspection interval.

The Federal Register Final Rule Notice regarding the CISI program (67 FR 60520, dated September 26, 2002) states in part: "This [the implementation of the CISI and ISI requirements] creates a hardship for licensees because ISI programs are required to maintain up to 3 separate editions and addenda of Section XI -- one edition and addenda applicable to

the ISI of Class MC and Class CC components, another edition and addenda applicable to the ISI of Class 1, 2, and 3 components, and a third edition and addenda applicable to Appendix VIII UT qualification requirements. Therefore, licensees may wish to synchronize 120-month interval updates such that the same edition and addenda of Section XI apply to the ISI of Class MC and Class CC components, Appendix VIII UT qualification requirements, and the ISI of Class 1, 2, and 3 components. Licensees wishing to synchronize their 120-month intervals may submit a request in accordance with § 50.55a(a)(3) to obtain authorization to extend or reduce 120-month intervals."

Currently, the CNP ISI and CISI Programs are required to be updated approximately 18 months apart. Updating the ISI Program and CISI Program separately with different program interval start dates creates a dual set of program requirements for examinations, testing, personnel certifications, and repair/replacement requirements. The proposed alternative will make the requirements consistent for the implementation of both programs by I&M, and for the inspection and audit activities performed by the regulatory and enforcement authorities.

The CISI Program inspection interval is being extended, rather than reducing the ISI Program inspection interval, because of the extensive planning that is necessary for the ISI examinations required to be performed at the end of the interval such as the mechanized reactor vessel examinations.

6.0 DURATION OF PROPOSED ALTERNATIVE

Relief is requested until March 1, 2010.

7.0 CONCLUSION

It is I&M's opinion that the extension of the First CISI Interval in conjunction with the additional examinations (described in Section 4.0) to be performed during the interim period provides an acceptable level of quality and safety as required by 10 CFR 50.55a(a)(3)(i).