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**Indiana Michigan Power**  
Cook Nuclear Plant  
One Cook Place  
Bridgman, MI 49106  
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November 16, 2007

AEP:NRC:7055-06  
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  
Containment Inservice Inspection Interval Extension  
Request for Additional Information

- References: 1. Letter from J. N. Jensen, 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, Containment Inservice Inspection Program," AEP:NRC:7055-02, dated July 17, 2007 (ML072060375).
2. Electronic mail from P. S. Tam, NRC, to M. K. Scarpello, I&M, "D. C. Cook - Draft RAI re. Extension of CISI Interval (TAC MD6083, MD6084)," dated October 16, 2007 (ML072890458).

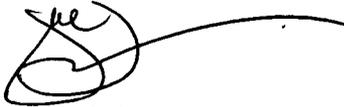
In Reference 1, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, requested Nuclear Regulatory Commission (NRC) approval of a proposed alternative to the American Society of Mechanical Engineers Code, Section XI, Containment Inservice Inspection (CISI) Program. Specifically, I&M requested an extension of CNP's current interval by approximately eighteen months to enable the CISI program to be coincident with CNP's Inservice Inspection Program.

In Reference 2, the NRC requested additional information regarding I&M's request. The attachment to this letter provides I&M's response to the request for additional information.

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This letter contains no new commitments. Should you have any questions, please contact Ms. Susan D. Simpson, Regulatory Affairs Manager, at (269) 466-2428.

Sincerely,

A handwritten signature in black ink, appearing to read "Jensen", with a long horizontal flourish extending to the right.

Joseph N. Jensen  
Site Vice President

RGV/rdw

Attachment

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:7055-06

Containment Inservice Inspection Interval Extension  
Request for Additional Information

In Reference 1, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, requested Nuclear Regulatory Commission (NRC) approval of a proposed alternative to the American Society of Mechanical Engineers Code (ASME), Section XI, Containment Inservice Inspection (CISI) Program. Specifically, I&M requested an extension of CNP's current interval by approximately eighteen months to enable the CISI program to be coincident with CNP's Inservice Inspection Program.

In Reference 2, the NRC requested additional information regarding I&M's request. The following provides I&M's response to the request for additional information.

NRC Request 1

*In Section 5.0 of the attachment to the 7/17/07 letter, I&M proposed that the first interval for the Containment In-service Inspection (CISI) be extended approximately 18 months from September 9, 2008 to March 1, 2010. The extension will permit I&M to achieve a common interval start date and a common In-service Inspection (ISI) code with the ISI program. I&M also states that the code of record for the updated (2010) ISI and CISI programs will be the latest edition incorporated by reference in 10 CFR 50.55a(b)(2) twelve months prior to March 1, 2010. These statements imply that March 1, 2010 applies to both Units 1 and 2. Please provide a table showing the current and proposed Units 1 and 2 ISI and CISI inspection interval dates and to clarify the statement relative to the code of record in the first paragraph of Section 5.0, "Proposed Alternative and Basis for Use."*

I&M Response to Request 1

Table 1 provides the requested information.

NRC Request 2

*The second paragraph of Section 5.0 of the attachment states that there are no augmented examination areas for either Unit 1 or Unit 2. This statement indicates that all surface areas (e.g., leak chase channels, sump liner) listed in IWE-1240 as likely areas requiring augmented examination and other areas such as space between ice baskets and the liner have been found acceptable and were not inspected in accordance with the augmented examination requirements of Table IWE 2500-1. Please provide further information relative to this statement, IWE-1240 and the Examination Category E C of Table IWE-2500-1 as applicable to the CNP Units 1 and 2.*

I&M Response to Request 2

There is no evidence of containment liner accessible areas experiencing accelerated degradation in either unit. Most of the liner plate behind the ice condensers is inaccessible. The ice baskets and interior of the ice condenser are separated from the containment liner by a paneled wall with a gap between the wall and the liner. There are inspection ports in the ice condenser that are used to monitor conditions of the containment liner behind the ice condenser. The liner in the area of the inspection ports shows no evidence of corrosion or accelerated degradation.

NRC Request 3

*Please confirm and provide pertinent information that the examination and tests (required by the CISI program) performed during recent inspections have satisfied the acceptance standards contained within Articles IWE-3000 and IWL-3000.*

I&M Response to Request 3

The recent examination results of the containment liner have satisfied the code acceptance criteria. The overall condition of the containment liners of both containments is very good following the implementation of a coatings inspection and maintenance program that supplements the ASME Code, Section XI examinations. The concrete examinations on both unit containments have been completed with the use of a crane and man-basket that provided a means to thoroughly examine the exterior concrete. There were no conditions that would adversely impact the structural integrity of either containment structure.

- References:
1. Letter from J. N. Jensen, I&M, to 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, Containment Inservice Inspection Program," AEP:NRC:7055-02, dated July 17, 2007 (ML072060375).
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Table 1  
Current and Proposed ISI and CISI Intervals

Program	Next Inspection Interval Start Date (Current Requirement)	Proposed Inspection Interval Start Date	Extended Period Examinations
ISI	3/1/2010 (Units 1 and 2)	3/1/2010 (Units 1 and 2)	ISI Program examinations are not impacted by the interval extension
CISI	9/9/2008 (Units 1 and 2)	3/1/2010 (Units 1 and 2)	<p>ASME Section XI, 1992 Edition/Addenda IWE examinations that are performed during a typical inspection period</p> <p>Category E-A, Item Number E1.11: General visual examination of accessible surfaces</p> <p>Category E-D, Item Number E5.30: VT-3 visual examination of moisture barriers</p> <p>Category E-G, Item Number E8.10, Note 2: VT-1 visual examinations of bolting during maintenance disassemblies</p> <p>Note: IWL examinations were completed in 2007 and will remain on a five year schedule</p>