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Indiana Michigan Power
Cook Nuclear Plant
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Bridgman, MI 49106
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December 20, 2007

AEP:NRC:7054-04
10 CFR 50.54(f)

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
Response to Generic Letter 2007-01: Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients
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, '90-Day Response to Nuclear Regulatory Commission Generic Letter 2007-01: Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients,'" AEP:NRC:7054-02, dated May 8, 2007 (ML071370358).

2. Letter from P. S. Tam, NRC, to M. W. Rencheck, I&M, "D. C. Cook Nuclear Plant, Units 1 and 2 – Request for Additional Information Regarding Response to Generic Letter 2007-01, 'Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients,' (TAC MD4318, MD4319)," dated November 16, 2007 (ML073180202).

In Reference 1, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, provided the Nuclear Regulatory Commission (NRC) a history of inaccessible or underground power cable failures for all cables that are within the scope of the Maintenance Rule. CNP also provided a description of the inspection, testing, and monitoring programs to detect the degradation of inaccessible or underground power cables that support systems that are within the scope of the Maintenance Rule.

In Reference 2, the NRC requested additional information regarding I&M's response. 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 or revised commitments. Should you have any questions, please contact Mr. James M. Petro, Regulatory Affairs Manager, at (269) 466-2491.

Sincerely,

Joseph N. Jensen
Site Vice President

SLA/rdw

Attachment

c: J. L. Caldwell - NRC Region III
K. D. Curry - AEP Ft. Wayne, w/o attachment
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 document 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

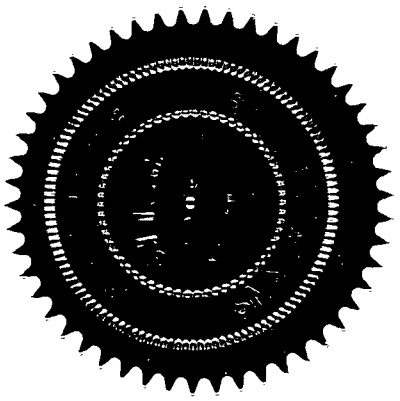
Joseph N. Jensen
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 20th DAY OF December, 2007

Sarah L. Rolheiser
Notary Public

My Commission Expires 9/9/2011



Attachment to AEP:NRC:7054-04

Response to Generic Letter 2007-01: Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients
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In Reference 1, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, provided the Nuclear Regulatory Commission (NRC) a history of inaccessible or underground power cable failures for all cables that are within the scope of the Maintenance Rule. CNP also provided a description of the inspection, testing, and monitoring programs to detect the degradation of inaccessible or underground power cables that support systems that are within the scope of the Maintenance Rule.

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

NRC Request 1

Licensee Event Report 50-315/98040-00 discussed a faulted underground cable due to aging of the cable. Please provide the information for the cable fault as requested in GL [Generic Letter] 2007-01, or justify why it is not in the scope of the GL.

I&M Response to Request 1

I&M has determined that the faulted underground cable that initiated the events described in Licensee Event Report 50-315/98040-00 is outside the scope of GL 2007-01. The GL required licensees to provide a history of inaccessible or underground power cable failures for all cables that are within the scope of 10 CFR 50.65 (Maintenance Rule). The cable failure described in the Licensee Event Report was for a 12 kilovolt (kV) power cable connected to the low voltage side of a 34.5kV/12kV switchyard station service transformer. CNP maintains an Inter-Organizational Agreement (IOA) with American Electric Power (AEP) Utility Operations that, in part, describes the ownership/maintenance boundaries for switchyard facilities and equipment. Responsibility for the station service transformers is assigned to AEP Utility Operations in the IOA. Based on the boundaries defined in the IOA, the failed cable is considered part of the transmission network subject to the maintenance programs of the Transmission System Operator and is not in the scope of 10 CFR 50.65.

NRC Request 2

The licensee reviewed its cable routing to identify cables that could routinely be exposed to moisture. A licensee should not have excluded cable failures based on whether the cables were routinely exposed to moisture. All failures of underground or inaccessible cables within the scope of the Maintenance Rule are within the scope of the GL. Please confirm that the reported cable failure history included all cable failures. If D.C. Cook's response to GL 2007-01 excluded cable failures based on moisture exposure, please provide the data for each cable failure as requested in GL 2007-01.

I&M Response to Request 2

I&M's response (Reference 1) to GL 2007-01, did not exclude cable failures based on moisture exposure. The response included a summary of the failure history search methodology used to identify failures of inaccessible or underground cables within the scope of the Maintenance Rule. Inherent in the methodology was an assumption that all underground or inaccessible cables could routinely be exposed to moisture. Based on this assumption, the cable population selected for failure history search included those that were installed in underground or inaccessible locations. The population also included an additional subset of cables within the scope of the Maintenance Rule that would not generally meet the definition of inaccessible or underground, but have a history of moisture exposure (i.e., cables located in pits beneath Motor Control Centers). Cable failures identified from maintenance history searches of the resulting population of cables were reported in I&M's response to GL 2007-01 without further consideration of moisture exposure.

References:

1. Letter from J. N. Jensen, I&M, to NRC Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, '90-Day Response to Nuclear Regulatory Commission Generic Letter 2007-01: Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients,'" AEP:NRC:7054-02, dated May 8, 2007 (ML071370358).

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