



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 19, 2009

Mr. Joseph N. Jensen  
Senior Vice President and  
Chief Nuclear Officer  
Indiana Michigan Power Company  
Nuclear Generation Group  
One Cook Place  
Bridgman, MI 49106

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 - REGULATORY  
COMMITMENT MANAGEMENT PROGRAM AUDIT REPORT  
(TAC NOS. ME1360 AND ME1361)

Dear Mr. Jensen:

On August 4-5, 2009, the NRC staff performed an audit of Indiana Michigan Power Company's (I&M) Donald C. Cook Nuclear Plant, Units 1 and 2, regulatory commitments management program.

The purpose of the audit was to examine I&M's regulatory commitments management program and the regulatory commitments change process. The staff examined I&M commitment management records, including a sample of regulatory commitments that have not been previously inspected or otherwise audited by the NRC staff, that are risk significant, and that were important to the U.S. Nuclear Regulatory Commission (NRC) staff's decision-making process on the licensing actions for which respective commitments were made.

Based on the results of the on-site audit of I&M's procedures, processes, and records for managing regulatory commitments, and reviewing an identified sample of regulatory commitments, the NRC staff concludes that I&M has implemented the regulatory commitments management program effectively. The regulatory commitments management program and the regulatory commitments change process were effectively implemented consistent with the Nuclear Energy Institute's (NEI) industry guidance, NEI 99-04, and were generally in accordance with the NRC staff's Office Instruction LIC-105.

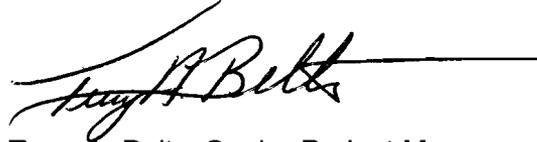
Details of the audit and the NRC staff's conclusions are set forth in the enclosed audit report.

J. Jensen

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The NRC staff appreciates the resources that were made available by your staff, both before and during the audit. If there are any questions, I can be contacted at (301) 415-3049 or by electronic mail at [Terry.Beltz@nrc.gov](mailto:Terry.Beltz@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Terry A. Beltz", is written over a horizontal line.

Terry A. Beltz, Senior Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosure:  
As stated

cc w/encl: Distribution via Listserv



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

INDIANA MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-315 AND 50-316

1.0 INTRODUCTION AND BACKGROUND

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented, and that changes to the regulatory commitments are evaluated, and when appropriate, reported to the NRC.

On May 27, 2003, the Office of Nuclear Reactor Regulation (NRR) issued Office Instruction LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC." LIC-105 is publicly available electronically from the Internet at the NRC web site, from the Agencywide Documents Access and Management System (ADAMS), Public Electronic Reading Room, ADAMS Accession No. ML022750041. LIC-105 provides the NRC staff and its stakeholders a reference for handling regulatory commitments made by the licensees for commercial nuclear power reactors. The guidance provided in LIC-105 is consistent with industry guidance prepared by NEI in NEI 99-04, "Guidelines for Managing NRC Commitment Changes."

As defined in NEI 99-04 and according to LIC-105, a "regulatory commitment" is an explicit statement to take a specific action agreed to, or volunteered by a licensee, and submitted in writing on the docket to the NRC. LIC-105 directs the NRR staff to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of commitments made to the NRC in past licensing actions (amendments, relief requests, exemptions, etc.) and activities (bulletins, generic letters, etc.). LIC-105 instructs the NRR project managers to perform audits of the licensees' commitments every 3 years.

The guidance that Indiana Michigan Power Company (I&M, the licensee) developed for the Donald C. Cook Nuclear Plant (CNP) to manage commitments made to the NRC and other regulatory and oversight agencies is established in procedure PMP-2350-CMS-001, "Commitment Management," Revision 3, effective July 31, 2009. This procedure details the CNP commitment management process, including defining responsibilities, commitment

Enclosure

identification and tracking, extension of commitment due dates, commitment closure, periodic review of commitments, and implementing changes to regulatory commitments.

On August 4-5, 2009, the NRC staff performed an audit of the regulatory commitments management program at CNP, Units 1 and 2. A summary of the NRC staff's activities, reviews, and conclusions is outlined below.

## 2.0 AUDIT PROCEDURE AND RESULTS

On August 4-5, 2009, the NRC staff performed the regulatory commitments management audit at the CNP, Units 1 and 2. LIC-105 limits the audit of commitments to those made by the licensee in writing to the NRC as a result of licensing actions (e.g., amendments, relief requests, exemptions, etc.) or licensing activities (e.g., bulletins, generic letters, etc.).

In preparation for the audit, the NRC staff searched in ADAMS for licensing actions, licensing activities, and other reports involving regulatory commitments and regulatory commitment changes during past 3 years. The staff also contacted I&M and obtained its list of regulatory commitments reported to the NRC staff during the past 3-year period. From the collected information, the NRC staff selected a representative sample of regulatory commitments that met the selection criteria identified in LIC-105 for the audit. The NRC staff asked I&M to provide the requisite documentation related to the commitments sample selected to support the audit.

The documents furnished by I&M included summary sheets providing the status of the commitments, the respective commitment management number(s), source documents, and appropriate backup documentation as needed (i.e., plant procedures, examination records, and/or other plant documentation). The regulatory commitments management records reviewed by the NRC were summaries of regulatory commitments implementation records, and summaries of regulatory commitments change reports.

The audit excluded the following types of commitments that are internal to licensee processes:

- (1) Commitments made on the licensee's own initiative among internal organizational components.
- (2) Commitments that pertain to milestones of licensing action/activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
- (3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee by the licensee having taken timely action in accordance with the subject requirements.

### 2.1 Verification of Licensee's Program for Implementation of Regulatory Commitments

The NRC staff's audit was intended to confirm that the licensee has documented its implementation of its regulatory commitments made to the NRC staff in past licensing communications.

The NRC staff found that licensee procedure PMP-2350-CMS-001 was an effective tool for managing and maintaining regulatory commitments, and generally provided an acceptable program as described in NEI 99-04.

The licensee enters the regulatory commitments made to the NRC that are explicit statements to take a specific action agreed to, or volunteered by a licensee, and submitted in writing on docket to the NRC into a commitment database. Each commitment is numbered and described by a commitment title and brief description. Comments and implementation dates are captured. The licensee's staff is regularly trained in procedures for entering and updating the regulatory commitments in its regulatory commitments management program. The regulatory commitments program procedure, PMP-2350-CMS-001, is followed in documenting, tracking, and implementing the regulatory commitments.

The sources of the commitments are documented in a source document. Incorporating documents provide the procedures or processes for maintaining and implementing the commitments. Closing documents provide the procedure or process for assuring that each regulatory commitment was properly completed, appropriately closed, and well documented.

Attachment 1 summarizes the representative sample of selected regulatory commitments that were evaluated for this audit. Based on the review of the selected sample of the regulatory commitments, the NRC staff concludes that the licensee's regulatory commitments management program generally conforms to the NRC accepted guidance in NEI 99-04, and is acceptable.

## 2.2 Verification of Licensee's Processes for Changes to Regulatory Commitments

The regulatory commitments changes are evaluated in accordance with provisions of Nuclear Energy Institute's guidance in NEI 99-04, "Guidelines for Managing NRC Commitments." The changes are reported to NRC biannually.

Based on its review, the NRC staff concludes that the changes to regulatory commitments are being reported to the NRC consistent with the NRC guidance.

## 3.0 CONCLUSION

The NRC staff concludes, based on the results of the on-site audit of I&M procedures, processes, and documentation for managing regulatory commitments, that I&M has implemented the regulatory commitments management program effectively, and implemented regulatory commitment changes appropriately, in accordance with LIC-105 and generally consistent with the NRC accepted guidance in NEI 99-04.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Michael K Scarpello  
Paul Schoepf  
Julie Newmiller

Principal Contributor: Terry A. Beltz

Date: August 19, 2009

Attachment:  
As stated

ATTACHMENT

REGULATORY COMMITMENTS - SUMMARY OF AUDIT RESULTS

AUDIT PERFORMED AUGUST 4-5, 2009

DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2

**REGULATORY COMMITMENTS - SUMMARY OF AUDIT RESULTS**

**AUDIT PERFORMED AUGUST 4-5, 2009**

**DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2**

<b>Letter Number</b>	<b>Subject</b>	<b>Commitment / CR Action No.</b>	<b>Description of Commitment</b>	<b>Implementation Status</b>
AEP:NRC:6054-07 10 CFR 50.54(f)  12/19/2006  ML063610088	Donald C. Cook Nuclear Plant, Units 1 and 2 – Revision of Commitments for Additional Information Regarding Nuclear Regulatory Commission Generic Letter 2004-02	8418	This information pertains to RAIs or other GL 2004-02 issues requested in the letter from P.S. Tam, NRC, to M.K. Nazar, I&M, dated February 9, 2006 (ML060370547).  The licensee will provide future update(s) within 60 days after all the information and supporting analysis results are available, but no later than December 31, 2007.	CLOSED on 02/29/2008
AEP:NRC:7504 10 CFR 50.4  02/09/2007  ML070520400	Donald C. Cook Nuclear Plant, Units 1 and 2 – Hydrogen Igniter Backup Power Supply	8440	Install design modifications in both Unit 1 and Unit 2 to provide an alternative method of activating the hydrogen igniters from an area other than the control room complex.  The commitment date is December 31, 2007.	CLOSED on 12/27/2007
AEP:NRC:6055-09 10 CFR 50.55a(3)(i)  09/29/2006  ML062850540	Donald C. Cook Nuclear Plant, Units 1 and 2 – Request for Approval of Risk-Informed Inservice Inspection Program for Class 1 and 2 Piping American Society of Mechanical Engineers Code, Category B-F, B-J, C-F-1 and C-F-2 Piping Welds	8420	Withdraw approved relief requests ISIR-005 and ISIR-006.  Following approval and implementation of the risk- informed inservice inspection program.	CLOSED on 11/05/2007
AEP:NRC:2073-38 10 CFR 50.4  01/10/2007  ML070230486	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies	8421 - 8430	I&M provided a list of commitments regarding requirements specified in Section B.5.b of NRC Orders related to mitigation strategies required by site security and emergency plans.  Scheduled completion dates were from 04/30/2007 through 12/30/2007.	CLOSED  8421 - 04/20/2007      8426 - 05/31/2007 8422 - 04/20/2007      8427 - 08/31/2007 8423 - 04/20/2007      8428 - 08/16/2007 8424 - 03/13/2007      8429 - 12/06/2007 8425 - 05/31/2007      8430 - 12/20/2007

Letter Number	Subject	Commitment / CR Action No.	Description of Commitment	Implementation Status
AEP:NRC:6055-16 AEP:NRC:6055-17 10 CFR 50.55a  09/26/2006 09/26/2006  ML062720122 ML062780203	Donald C. Cook Nuclear Plant, Unit 1 – Supplement to Proposed Alternatives to the American Society of Mechanical Engineers Code, Section XI, Repair Requirements	8409	Complete stress analysis summaries of the preemptive weld overlay prior to restart of Unit 1 and provide the summaries within four weeks after restart from the Unit 1 (Fall 2006) refueling outage.	CLOSED on 12/07/2006
AEP:NRC:6055-16 AEP:NRC:6055-17 10 CFR 50.55a  09/26/2006 09/26/2006  ML062720122 ML062780203	Donald C. Cook Nuclear Plant, Unit 1 – Supplement to Proposed Alternatives to the American Society of Mechanical Engineers Code, Section XI, Repair Requirements	8410	Provide the Preemptive Weld Overlay ultrasonic examination results to the NRC.  The results will include: <ul style="list-style-type: none"> <li>• a listing of indications detected</li> <li>• the disposition of all indications using the standards of the ASME Code, Section XI, IWB-3514-3 and/or IWB-3514-3 criteria and, if possible,</li> <li>• the type and nature of the indications.</li> </ul> Also included in the results will be a discussion of any repairs to the overlay material and/or base metal and the reason for the repair.  Subsequent inservice examination of the structural weld overlays on pressurizer will be in accordance with ASME Code, Section XI, Appendix Q, Q-4300  The information will be provided within 14 days after the completion of the last ultrasonic examination of the weld overlays.	CLOSED on 11/06/2006

Letter Number	Subject	Commitment / CR Action No.	Description of Commitment	Implementation Status
AEP:NRC:6046-01 AEP:NRC:7046-01 AEP:NRC:7046-03 10 CFR 50.46  12/07/2006 06/15/2007 10/16/2007  ML063530324 ML071770136 ML072990070	Donald C. Cook Nuclear Plant, Units 1 and 2 – Thirty-Day Report for Loss-of-Coolant Accident (LOCA) Evaluation Model Changes	8302   8385   8304   8306	1) Provide a new Unit 1 small break LOCA analysis of the safety injection cross-tie valves closed case.  Scheduled completion date is March 2007.  2) Provide a new Unit 1 large break LOCA analysis.  Scheduled completion date is December 2007.  3) Provide a new Unit 2 small break LOCA analysis of both the safety injection cross-tie valves closed case and the safety injection cross-tie valves open case.  Scheduled completion date is March 2009.  4) Provide a new Unit 2 large break LOCA analysis.  Schedule completion date is March 2009.	CLOSED on 03/29/2007   CLOSED on 12/27/2007   CLOSED on 03/30/2009   CLOSED on 03/19/2009
AEP:NRC:7565-01 10 CFR 50.90  12/27/2007  ML080090299	Donald C. Cook Nuclear Plant, Units 1 – License Amendment Request Regarding Loss-of- Coolant Accident Analysis Methodology	8482	Complete the residual heat removal (RHR) cross-tie valve modification, allowing the Donald C. Cook Nuclear Plant, Unit 1, to operate with RHR cross-tie valves open and four-loop injection during a postulated large break LOCA.  License amendment request approval and modification completion prior to entering Mode 3 following the Unit 1, Cycle 22, refueling outage. Due Date: 04/30/2008	CLOSED on 04/23/2008

Letter Number	Subject	Commitment / CR Action No.	Description of Commitment	Implementation Status
AEP:NRC:8054-04 AEP-NRC-2008-43 10 CFR Part 50.54(f)  April 10, 2008 (3-month response) October 14, 2008 (9-month response)  ML081120235 ML082950467	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems”	8459          8458	Perform system walkdowns in Unit 1 and Unit 2 Containment as required for the response to GL 2008-01.  <u>Unit 1</u> – Scheduled completion date is by the end of the Unit 1 RFO (U1C23) planned for Fall 2009. Note: U1C23 scheduled for Spring 2010. Due Date: 03/31/2010  <u>Unit 2</u> – Scheduled completion date is by the end of the Unit 2 RFO (U2C18) planned for Spring 2009. Due Date: 04/14/2009	OPEN          CLOSED on 04/04/2009
AEP:NRC:8054-04 AEP-NRC-2008-43 10 CFR Part 50.54(f)  April 10, 2008 (3-month response) October 14, 2008 (9-month response)  ML081120235 ML082950467	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems”	8461          8460	Provide a supplemental evaluation for Unit 1 and Unit 2 in response to GL 2008-01.  <u>Unit 1</u> – Scheduled completion date is within 3 months following the end of the Unit 1 RFO (U1C23) planned for Fall 2009. Note: U1C23 scheduled for Spring 2010. Due Date: 06/15/2010  <u>Unit 2</u> – Scheduled completion date is within 3 months following the end of the Unit 2 RFO (U2C18) planned for Spring 2009.	OPEN          CLOSED on 07/24/2009

Letter Number	Subject	Commitment / CR Action No.	Description of Commitment	Implementation Status
<p>AEP-NRC-2008-43 10 CFR Part 50.54(f)</p> <p>October 14, 2008 (9-month response)</p> <p>ML082950467</p>	<p>Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems”</p>	<p>8462</p>	<p>Create a Gas Accumulation Condition Monitoring Program document. This document will contain the following:</p> <ul style="list-style-type: none"> <li>• Performance Monitoring – Description of the routine monitoring and trending of plant parameters that may indicate an increased potential for gas accumulation.</li> <li>• Testing – Location and periodicity of UTs performed to monitor ECCS piping for void formation</li> <li>• Evaluation – Methodology for evaluating identified voids, including acceptance criteria for operability.</li> </ul> <p>Scheduled completion date is March 14, 2009.</p>	<p>CLOSED on 03/12/2009</p>
<p>AEP-NRC-2008-43 10 CFR Part 50.54(f)</p> <p>October 14, 2008 (9-month response)</p> <p>ML082950467</p>	<p>Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems”</p>	<p>8476</p>	<p>Add a description of the Gas Accumulation Condition Monitoring Program to the UFSAR.</p> <p>Scheduled completion date is March 31, 2009.</p>	<p>CLOSED on 03/26/2009</p>
<p>AEP-NRC-2008-43 10 CFR Part 50.54(f)</p> <p>October 14, 2008 (9-month response)</p> <p>ML082950467</p>	<p>Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems”</p>	<p>8470</p>	<p>Evaluate the STF Traveler for gas accumulation to either supplement or replace the current TS requirements.</p> <p>Scheduled completion date is 60 days after the TSTF is approved by the NRC.</p> <p>Due date is contingent upon NRC issuance of TSTF.</p>	<p>OPEN</p>

Letter Number	Subject	Commitment / CR Action No.	Description of Commitment	Implementation Status
AEP-NRC-2008-43 10 CFR Part 50.54(f)  October 14, 2008 (9-month response)  ML082950467	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	8463	Incorporate interim criteria for operability into the Gas Accumulation Condition Monitoring Program.  Scheduled completion date is March 14, 2009. This date coincides with creation of the Gas Accumulation Condition Monitoring Program document.	CLOSED on 03/12/2009
AEP-NRC-2008-43 10 CFR Part 50.54(f)  October 14, 2008 (9-month response)  ML082950467	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	8464	Add a vent to the CCP Appendix R discharge unit crosstie. <sup>(1)</sup>  Scheduled completion date is by the end of the Unit 2 RFO (U2C18) planned for Spring 2009.	CLOSED on 04/14/2009
AEP-NRC-2008-43 10 CFR Part 50.54(f)  October 14, 2008 (9-month response)  ML082950467	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	8471  8465	Add vent valves to the RCP seal line. <sup>(1)</sup>  <u>Unit 1</u> – Scheduled completion date is by the end of the Unit 1 RFO (U1C23) planned for Fall 2009. Note: U1C23 scheduled for Spring 2010.  <u>Unit 2</u> – Scheduled completion date is by the end of the Unit 2 RFO (U2C18) planned for Spring 2009.	OPEN  CLOSED on 04/29/2009
AEP-NRC-2008-43 10 CFR Part 50.54(f)  October 14, 2008 (9-month response)  ML082950467	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	8472  8466	Add a vent valve to the CCP ELO piping downstream of the flow restricting orifice. <sup>(1)</sup>  <u>Unit 1</u> – Scheduled completion date is by the end of the Unit 1 RFO (U1C23) planned for Fall 2009. Note: U1C23 scheduled for Spring 2010.  <u>Unit 2</u> – Scheduled completion date is by the end of the Unit 2 RFO (U2C18) planned for Spring 2009.	OPEN  CLOSED on 04/16/2009

**Note (1):** In the event of a unit shutdown of extended duration, the modifications will be installed prior to startup if it is determined that there will be no impact on the unit return to service schedule.

Letter Number	Subject	Commitment / CR Action No.	Description of Commitment	Implementation Status
AEP-NRC-2008-43 10 CFR Part 50.54(f)  October 14, 2008 (9-month response)  ML082950467	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	8473	Complete walkdown of piping inside the Auxiliary Building LDEs.  Scheduled completion date is January 15, 2009.	CLOSED on 01/14/2009
AEP-NRC-2008-43 10 CFR Part 50.54(f)  October 14, 2008 (9-month response)  ML082950467	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	8467	Modify the Work Control procedure to better describe the role of the Work Assessment Group in preventing gas intrusion.  Scheduled completion date is March 14, 2009.	CLOSED on 03/13/2009
AEP-NRC-2008-43 10 CFR Part 50.54(f)  October 14, 2008 (9-month response)  ML082950467	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	8477	Develop a guideline for outage scheduling to assist in the proper schedule sequencing of maintenance activities and system restoration.  Scheduled completion date is March 14, 2009.	CLOSED on 03/09/2009
AEP-NRC-2008-43 10 CFR Part 50.54(f)  October 14, 2008 (9-month response)  ML082950467	Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	8483	Monitor ongoing industry programs for Gas Accumulation.  <ul style="list-style-type: none"> <li>• Gas transport in pump suction piping</li> <li>• Pump gas void ingestion tolerance limits</li> </ul> Commitment for monitoring is an ongoing evolution.	OPEN

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<p>AEP-NRC-2008-43 10 CFR Part 50.54(f)</p> <p>October 14, 2008 (9-month response)</p> <p>ML082950467</p>	<p>Donald C. Cook Nuclear Plant, Units 1 and 2 – Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"</p>	<p>8478</p>	<p>Define added scope of UTs and documents in the Gas Intrusion Condition Monitoring Program.</p> <p>Scheduled completion date is March 14, 2009.</p>	<p>CLOSED on 03/12/2009</p>
<p>AEP:NRC:8046 10 CFR 50.46</p> <p>February 29, 2008</p> <p>ML090740053</p>	<p>Donald C. Cook Nuclear Plant, Units 1 – Response to Request for Additional Information Regarding the Reanalysis of Unit 1 Small Break LOCA</p>	<p>8457</p>	<p>Provide the NRC information on the Unit 1 small break LOCA analysis 8.75-inch case using the corrected flow rates.</p> <p>Scheduled submittal date is June 30, 2008.</p> <p>NRR provided verbal authorization on June 27, 2008, to extend due date to July 25, 2008.</p>	<p>CLOSED on 07/24/2008</p>
<p>AEP:NRC:8054-02 10 CFR 50.54(f)</p> <p>February 29, 2008</p> <p>ML080770404</p>	<p>Donald C. Cook Nuclear Plant, Units 1 and 2 – Supplemental Response to NRC GL 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors</p>	<p>8442</p>	<p>Modify the insulation on the NESW lines inside the crane wall below the SG enclosures such that the foam insulation (Rubatex) is double-jacketed without moisture barrier backing.</p> <p>Scheduled completion is prior to Unit 1 entry into Mode 4 at the end of the Spring 2008 RFO.</p>	<p>CLOSED on 04/20/2008</p>
<p>AEP:NRC:8054-02 10 CFR 50.54(f)</p> <p>February 29, 2008</p> <p>ML080770404</p>	<p>Donald C. Cook Nuclear Plant, Units 1 and 2 – Supplemental Response to NRC GL 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors</p>	<p>8444</p>	<p>Complete removal of all labels, tags, signs, tape, and similar materials to the extent practical in Unit 1</p> <p>Scheduled completion is prior to Unit 1 entry into Mode 4 at the end of the Spring 2008 RFO.</p>	<p>CLOSED on 04/20/2008</p>

Letter Number	Subject	Commitment / CR Action No.	Description of Commitment	Implementation Status
AEP:NRC:8054-02 10 CFR 50.54(f)  February 29, 2008  ML080770404	Donald C. Cook Nuclear Plant, Units 1 and 2 – Supplemental Response to NRC GL 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors	8447	Perform sampling of latent debris in containment when major work activities that could result in the generation of significant quantities of latent debris are performed.  Commitment is an ongoing evolution.	ONGOING
AEP:NRC:8054-02 10 CFR 50.54(f)  February 29, 2008  ML080770404	Donald C. Cook Nuclear Plant, Units 1 and 2 – Supplemental Response to NRC GL 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors	8448	Commencing with the Unit 2 Spring 2009 RFO, as assessment of containment debris sources will be completed.  Commitment is an ongoing evolution.	ONGOING
AEP:NRC:8054-02 10 CFR 50.54(f)  February 29, 2008  ML080770404	Donald C. Cook Nuclear Plant, Units 1 and 2 – Supplemental Response to NRC GL 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors	8441	Maintain the necessary programmatic and process controls, such as those described in the response to information item 3.i.2, to ensure the ECCS and CTS recirculation functions are maintained in accordance with the applicable regulatory requirements identified in GL 2004-02.  Commitment is an ongoing evolution.	ONGOING
AEP:NRC:8054-02 10 CFR 50.54(f)  February 29, 2008  ML080770404	Donald C. Cook Nuclear Plant, Units 1 and 2 – Supplemental Response to NRC GL 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors	8449	Evaluate station programs and processes to ensure the necessary controls to prevent the introduction of foreign material into containment will be in place prior to implementation of the new mechanistic design and licensing basis requirements that support resolution of GL 2004-02.  Scheduled completion date is May 31, 2008.	CLOSED on 05/31/2008

Letter Number	Subject	Commitment / CR Action No.	Description of Commitment	Implementation Status
AEP:NRC:8054-02 10 CFR 50.54(f)  February 29, 2008  ML080770404	Donald C. Cook Nuclear Plant, Units 1 and 2 – Supplemental Response to NRC GL 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors	8450	Evaluate the downstream effects within pumps, the reactor vessel, and the reactor core.  Scheduled completion date is May 31, 2008.	CLOSED on 05/31/2008
AEP:NRC:8054-02 10 CFR 50.54(f)  February 29, 2008  ML080770404	Donald C. Cook Nuclear Plant, Units 1 and 2 – Supplemental Response to NRC GL 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors	8454	Change the licensing basis to reflect the mechanistic evaluation of the effect of post-accident debris on the ECCS and CTS recirculation function.  Scheduled completion date is May 31, 2008.	CLOSED on 05/31/2008
AEP:NRC:8054-02 10 CFR 50.54(f)  February 29, 2008  ML080770404	Donald C. Cook Nuclear Plant, Units 1 and 2 – Supplemental Response to NRC GL 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors	8455	Change UFSAR Section 6.2, Section 6.3, Figure 6.2-1A, and Figure 9.3-1 to reflect installation of a new remote strainer in Unit 1.  Scheduled completion is prior to Unit 1 entry into Mode 4 at the end of the Spring 2008 RFO.	CLOSED on 04/23/2008

J. Jensen

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The NRC staff appreciates the resources that were made available by your staff, both before and during the audit. If there are any questions, I can be contacted at (301) 415-3049 or by electronic mail at [Terry.Beltz@nrc.gov](mailto:Terry.Beltz@nrc.gov).

Sincerely,

**/RA/**

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Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

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