INDIANA MICHIGAN POWER®
A unit of American Electric Power

Indiana Michigan Power
Cook Nuclear Plant
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October 17, 2013

AEP-NRC-2013-82
10 CFR 50.4

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2
REVISION TO REGULATORY COMMITMENT ASSOCIATED WITH
APPLICATION FOR RENEWED OPERATING LICENSE

References: 1) Safety Evaluation Report Related to the License Renewal of the Donald C. Cook Nuclear Plant, Units 1 and 2 from the U.S. Nuclear Regulatory Commission to Indiana Michigan Power Company, dated May 2005.

Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant, Units 1 and 2, is providing notification of a change to a commitment documented in Reference 1.

Original Commitment:

In Reference 1, the U.S. Nuclear Regulatory Commission (NRC) documented that I&M made the following commitment (Reference 1, Appendix A, Items 5 and 42) with a due date of October 25, 2014, for Unit 1 and December 23, 2017, for Unit 2:

> The Buried Piping Inspection Program will be implemented prior to the period of extended operation. The program will include (a) preventive measures to mitigate corrosion and (b) periodic inspections to manage the effects of corrosion on the pressure-retaining capability of buried carbon steel piping and tanks. Preventive measures will be in accordance with standard industry practice for maintaining external coatings and wrappings. Buried piping and tanks, including buried piping and tanks constructed from carbon steel and iron that are not within the scope of license renewal, will be inspected when they are excavated during maintenance. Deficiencies associated with out-of-scope piping and tanks will be evaluated for extent of condition, as applicable, to in-scope buried piping and tanks.
>
> The Buried Piping Inspection Program will be consistent with, but include an exception to, the program described in NUREG-1801, July 2001, Section XI,M34, as documented in License Renewal Application, Section B.1.6, Page B-31.

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> I&M commits to enhance the new Buried Piping Inspection Program to require performance of an inspection of a sample of buried piping included in the scope of this program within ten years after entering the period of extended operation, unless an opportunistic inspection of similar underground piping has occurred within this ten-year period. Before the end of the tenth year of extended operation, I&M will perform an engineering evaluation to determine if sufficient inspections have been conducted to draw a conclusion regarding the ability of the underground coatings to protect the underground piping from degradation. If not, I&M will conduct an inspection of a sample of buried piping to allow that conclusion to be reached.

Revision to Commitment

I&M is changing this commitment to add reference to iron and copper piping. In May of 2012, it was identified that there was buried copper tubing associated with the Emergency Diesel Generator fuel tanks. Although included in the scope of license renewal, this tubing had not been identified previously as being in a soil environment; therefore, the Buried Piping Aging Management Program has not identified it as part of its scope. For the purposes of the Buried Piping Program, "piping" refers to pipe, tubing, and associated fittings.

The revised commitment will read as follows:

> The Buried Piping Inspection Program will be implemented prior to the period of extended operation. The program will include (a) preventive measures to mitigate corrosion and (b) periodic inspections to manage the effects of corrosion on the pressure-retaining capability of buried carbon steel, *copper alloy, copper, and iron* piping, and tanks. Preventive measures will be in accordance with standard industry practice for maintaining external coatings and wrappings. Buried piping and tanks, including buried piping and tanks constructed from carbon steel, *copper alloy, copper,* and iron that are not within the scope of license renewal, will be inspected when they are excavated during maintenance. Deficiencies associated with out-of-scope piping and tanks will be evaluated for extent of condition, as applicable, to in-scope buried piping and tanks.
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> The Buried Piping Inspection Program will be consistent with, but include an exception to, the program described in NUREG-1801, July 2001, Section XI,M34, as documented in License Renewal Application, Section B.1.6, Page B-31.
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This letter contains no new regulatory commitments and one revised regulatory commitment as summarized in the enclosure to this letter.

Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Manager, at (269) 466-2649.

Sincerely,

Joel P. Gebbie
Site Vice President

KMH/amp

Enclosure

c: J. T. King, MPSC
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MDEQ – RMD/RPS
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ENCLOSURE 1 TO AEP-NRC-2013-82

REGULATORY COMMITMENT

The following table identifies the revised action 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.

Commitment	Date
The Buried Piping Inspection Program will be implemented prior to the period of extended operation. The program will include (a) preventive measures to mitigate corrosion and (b) periodic inspections to manage the effects of corrosion on the pressure-retaining capability of buried carbon steel, copper alloy, copper, and iron piping and tanks. Preventive measures will be in accordance with standard industry practice for maintaining external coatings and wrappings. Buried piping and tanks, including buried piping and tanks constructed from carbon steel, copper alloy, copper, and iron that are not within the scope of license renewal, will be inspected when they are excavated during maintenance. Deficiencies associated with out-of-scope piping and tanks will be evaluated for extent of condition, as applicable, to in-scope buried piping and tanks. The Buried Piping Inspection Program will be consistent with, but include an exception to, the program described in NUREG-1801, July 2001, Section XI,M34, as documented in License Renewal Application, Section B.1.6, Page B-31. I&M commits to enhance the new Buried Piping Inspection Program to require performance of an inspection of a sample of buried piping included in the scope of this program within ten years after entering the period of extended operation, unless an opportunistic inspection of similar underground piping has occurred within this ten-year period. Before the end of the tenth year of extended operation, I&M will perform an engineering evaluation to determine if sufficient inspections have been conducted to draw a conclusion regarding the ability of the underground coatings to protect the underground piping from degradation. If not, I&M will conduct an inspection of a sample of buried piping to allow that conclusion to be reached.	Unit 1: October 25, 2014 Unit 2: December 23, 2017