

Indiana Michigan  
Power Company  
Cook Nuclear Plant  
One Cook Place  
Bridgman, MI 49106  
616-465-5901



C1099-09

October 25, 1999

Docket Nos. 50-315  
50-316

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, D.C. 20555

Donald C. Cook Nuclear Plant Units 1 and 2  
MODIFICATION OF COMMITMENTS RELATED TO THE  
DESIGN BASIS DOCUMENT RECONSTITUTION (DBDR) PROJECT

Indiana Michigan Power Company (I&M) hereby provides notification of a change to our commitment for completion of our Design Basis Document Reconstitution (DBDR) project.

This letter changes our commitment made in the letter of February 6, 1997, "Request for Information Pursuant to 10 CFR 50.54(f) Regarding Adequacy and Availability of Design Basis Information," (Reference 1), regarding completion of the DBDR project by the end of 1999. As identified in our letter from R. P. Powers (I&M) to NRC dated March 12, 1999, "Donald C. Cook Nuclear Plant Units 1 and 2, Restart Plan Revision 5", we have undertaken a series of activities that include expanded system readiness reviews and program readiness assessments. In order to incorporate the results from these restart activities into the design bases documents, I&M must reschedule the DBDR completion commitment. Consistent with these restart efforts, we will provide a plan within 6 months of the restart of the second unit containing the revised completion information for the DBDR program.

This commitment change is consistent with our letter of July 31, 1998, "Response to Request for Information Pursuant to 10 CFR 50.54(f) Regarding the 2.206 Petition filed by the Union of Concerned Scientists," (Reference 2). In this letter we specifically identified the DBDR project as an ongoing effort that will continue as a post restart activity. We also clarified the positions stated in

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Reference 1 regarding our recognition of the need to enhance the process of understanding our design and licensing bases.

The DBDR as noted in reference 2 is not necessary for restart. Further in the letter of March 19, 1999, "Reply to Notice of Violation dated October 13, 1998," (Reference 3), I&M stated that the expanded discovery effort and associated corrective actions are intended to provide reasonable assurance that each unit, when ready for restart, will be operated safely and in accordance with its design and licensing bases. Reference 3 also stated that I&M will take actions to provide reasonable assurance that any identified plant conditions that deviate from the design and licensing bases are appropriately restored, reanalyzed or addressed by licensing action.

Attachment 1 to this letter delineates the current commitment related to the DBDR project; all previous commitments concerning the DBDR project are considered superseded by this commitment.

Should you have any questions, please contact Mr. Robert C. Godley, Director of Regulatory Affairs, at (616) 466-2698.

Sincerely,



M. W. Rencheck  
Vice President Nuclear Engineering

/dms

Attachments

c: J. E. Dyer, w/attachments  
MDEQ - DW & RPD  
NRC Resident Inspector, w/attachments  
R. Whale, w/attachments

#### REFERENCES

1. Letter from E. E. Fitzpatrick (I&M) to NRC dated February 6, 1997, "D. C. Cook Nuclear Plant Units 1 and 2; Request for Information Pursuant to 10 CFR 50.54(f) Regarding Adequacy and Availability of Design Basis Information," (AEP:NRC:1257).
2. Letter from J. R. Sampson (I&M) to NRC dated July 31, 1998, "Donald C. Cook Nuclear Plant Units 1 and 2 Response to Request for Information pursuant to 10 CFR 50.54 (f) Regarding the 2.206 Petition filed by the Union of Concerned Scientists," (AEP:NRC:1260G7)
3. Letter from R. P. Powers (I&M) to NRC dated March 19, 1999, "Donald C. Cook Nuclear Power Plant, Units 1 and 2 Enforcement Actions 98-150, 98-151, 98-152 and 98-186 Reply to Notice of Violation Dated October 13, 1998," (AEP:NRC:1260GH).

ATTACHMENT TO C1099-09

COMMITMENTS

The following table identifies those actions committed to by Indiana and Michigan Power Company (I&M) in this submittal. Any other actions discussed in the submittal represent intended or planned actions by I&M. They are described to the NRC for the NRC's information and are not regulatory commitments.

Commitment	Date
Provide a DBDR Project plan	Within six months after restart of the second unit from the current outage