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U.S. Nuclear Regulatory Commission
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Donald C. Cook Nuclear Plant Units 1 and 2
VERIFICATION OF CONFIRMATORY ACTION LETTER RESOLUTION

This letter updates and supplements Indiana Michigan Power Company's (I&M's) response to the Nuclear Regulatory Commission's (NRC) September 19, 1997, Confirmatory Action Letter (CAL) for the Donald C. Cook Nuclear Plant (CNP).

In accordance with a commitment made in a March 17, 1999, letter to the NRC, I&M has taken steps to verify that its CAL response remains valid in light of its Expanded System Readiness Review (ESRR) findings. Based on team reviews, I&M has verified that CAL Items 2, 5, and 6 are closed. We will update the NRC on closure of the remaining CAL issues in future correspondence.

The attachment to this letter provides a brief background on these issues and a description of efforts taken to confirm closure of these CAL items.

Please contact Robert C. Godley, Director, Regulatory Affairs, at (616) 466-2698, if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink that reads 'R. P. Powers'.

R. P. Powers
Vice President

Attachments

/dms

IE36.

A handwritten mark or signature in black ink, possibly initials, located in the bottom right area of the page.

PDR ADOCK

AEP: America's Energy Partner®

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

Donald C. Cook Nuclear Plant Units 1 and 2
VERIFICATION OF CONFIRMATORY ACTION LETTER RESOLUTION

I. INTRODUCTION

In accordance with a commitment made in a March 17, 1999, letter to the NRC (Reference 1), Indiana Michigan Power Company (I&M) has taken steps to verify that the Confirmatory Action Letter (CAL) response for Cook Nuclear Plant (CNP) remains valid in light of our Expanded System Readiness Review (ESRR) findings. Based on team reviews, I&M has verified that CAL Items 2, 5, and 6 are closed. The following provides a brief background on these issues and a description of efforts taken to confirm closure of these CAL items.

II. BACKGROUND

During September 1997, and in response to an earlier I&M letter (Reference 2), the NRC Region III Regional Administrator issued a CAL to I&M, the licensee for CNP (Reference 3). This CAL confirmed I&M's commitment to resolve seven CAL items (CAL items 1-7) prior to restart and two additional concerns identified by the NRC (CAL items 8-9), one of which the NRC expected would be completed prior to restart. The CAL also confirmed I&M's decision to perform a short-term assessment to determine whether the engineering problems identified in the CAL existed in other safety-related systems and, if so, whether these problems affected system operability.

On December 2, 1997, I&M submitted its response to the CAL (Reference 4). In that letter, I&M described the efforts undertaken to that point to address the CAL items. This letter was supplemented in public meetings held with the NRC Staff on December 16, 1997, and January 8, 1998, and in letters from I&M dated December 24, 1997, and January 29, 1998 (References 5 and 6). NRC inspectors subsequently reviewed I&M's actions and closed several of the CAL items in May 1998 (Reference 7).

In response to issues identified during subsequent engineering self-assessments, I&M initiated the ESRR to conduct a more rigorous review of CNP systems prior to plant restart. I&M also initiated expanded discovery efforts for programs (Programmatic Assessments) and functional areas (Functional Area Assessments). These expanded discovery efforts are described in detail in Revision 5 to the D.C. Cook Restart Plan (Reference 8).

As a result of I&M's intrusive discovery process, certain calculation input assumptions supporting the response to CAL Item 1, "Recirculation Sump Inventory/Containment Dead Ended Compartments Issue," were determined to be non-conservative. Accordingly, I&M withdrew its original response to CAL Item 1 (Reference 1), and committed to perform a detailed analysis to ensure that the other CAL responses remain valid (Reference 9).

III. DISCUSSION

On September 24, 1999, I&M met with the NRC and reviewed the process we were applying to review the remaining responses to the CAL. In summary, to ensure that the earlier CAL responses remain valid in light of ESRR findings, I&M has taken steps to:

- Confirm that the concerns delineated in the CAL have been satisfactorily bounded
- Confirm that a comprehensive design review has been completed with respect to CAL Item 1, "Recirculation Sump Inventory/Containment Dead Ended Compartments Issue"
- Review the remaining responses to the CAL to ensure that they remain valid in light of the findings that emerged from ESRR

In order to complete this review, management assembled a team of engineering, operations and licensing personnel. Team members were assigned to each CAL item. The teams reviewed documents associated with closure of the original CAL item, related condition reports and other documents produced subsequent to the original CAL responses, and related documentation produced as part of ESRR. For each CAL item, team members made a determination whether, in light of the findings that emerged from the ESRRs, the CAL item remains resolved.

As described further below, the review teams concluded that CAL items 2, 5, and 6 remain resolved. Closure packages have been assembled in accordance with our standard validation practices to document the bases for these conclusions. Performance Assurance department personnel have reviewed the basis for closure of these CAL items and concur with these conclusions. The following discussion provides a brief summary of the bases for these conclusions.

CAL Item 2 – Recirculation Sump Venting

CAL Item:

"Venting will be re-installed in the recirculation sump cover. The design will incorporate foreign material exclusion [FME] requirements for the sump." Confirmatory Action Letter (CAL No. RIII-97-011) from Beach (NRC) to Fitzpatrick (I&M), dated September 19, 1997.

Basis for Determining that this CAL Item has been Resolved:

This CAL item dealt with the improper plugging of vent holes in the "roof" of the containment recirculation sump enclosures. Additionally, the original design of these vents lacked foreign material exclusion (FME) protection. To resolve this CAL item, the sump

vent holes were re-established and FME screens were installed over the vent holes. Actions required to close this CAL item are complete.

Additional CAL-Related Findings from ESRR:

During development of the CAL Item 2 closure package, an issue was identified concerning an earlier resolution of a discrepant condition found during installation of the FME screens. Specifically, the spacing of two of the vent holes deviated from that shown on the design drawing. To ensure an adequate design evaluation and configuration impact review has been performed to accept the condition, I&M is evaluating the issue under its current procedures for evaluation of discrepant conditions. Resolution of this issue is not a prerequisite to closure of CAL Item 2.

CAL Item 5 – Compressed Air Overpressure

CAL Item:

"Overpressure protection will be provided downstream of the 20 psig, 50 psig, and 85 psig control air regulators to mitigate the effects of a postulated failed regulator." Confirmatory Action Letter (CAL No. RIII-97-011) from Beach (NRC) to Fitzpatrick (I&M), dated September 19, 1997.

Basis for Determining that this CAL Item has been Resolved:

This CAL item dealt with the lack of overpressure protection on several control air headers. To resolve this CAL item, a design change package was initiated and redundant relief protection has been installed on the affected headers. Actions required to close this CAL item are complete.

Additional CAL-Related Findings from ESRR:

During the ESRR, engineering personnel identified a similar configuration on the 12 psig control air headers. While the affected headers contain a downstream relief valve, an ongoing engineering evaluation will determine whether the existing configuration is acceptable. Resolution of this issue is not a prerequisite to closure of CAL Item 5.

CAL Item 6 – Residual Heat Removal (RHR) Suction Valve Interlock

CAL Item:

"A Technical Specification change to allow operation in Mode 4 with the RHR [Residual Heat Removal] suction valves open and power removed is being processed. Approval of this change by the NRC will be required prior to restart." Confirmatory Action Letter

(CAL No. RIII-97-011) from Beach (NRC) to Fitzpatrick (I&M), dated September 19, 1997.

Basis for Determining that this CAL Item has been Resolved:

This CAL item concerned the failure to recognize the need for an amendment to the technical specifications when operating practices were changed in response to industry events. To resolve this CAL item, a license amendment request was submitted by I&M and approved by the NRC during the last quarter of 1997. Actions required to close this CAL item are complete.

Additional CAL-Related Findings from ESRR:

No additional actions were identified during the ESRR requiring resolution to close this CAL item.

IV. CONCLUSION

I&M has confirmed closure of CAL items 2, 5, and 6. Supporting documentation and information is available on site for review. We will continue to challenge the adequacy of the resolution of the remaining CAL items to ensure that final resolution is aligned with our standards.

References

1. Letter from M. W. Rencheck (I&M) to NRC dated March 17, 1999, "Donald C. Cook Nuclear Plants Units 1 & 2, Withdrawal of Response to Issue No. 1 of the NRC Confirmatory Action Letter of September 19, 1997, RIII-97-011," (AEP:NRC:1260GQ).
2. Letter from E. E. Fitzpatrick (I&M) to NRC dated September 18, 1997, "Donald C. Cook Nuclear Plant Units 1 and 2, License Nos. DPR-58 and DPR-74, Summary of Restart Items," (AEP:NRC:1260G1).
3. Letter from A. B. Beach (NRC) to E. E. Fitzpatrick (I&M) dated September 19, 1997, "Confirmatory Action Letter," (CAL No. RIII-97-011).
4. Letter from E. E. Fitzpatrick (I&M) to NRC dated December 2, 1997, "Donald C. Cook Nuclear Plant Units 1 and 2, Response to Confirmatory Action Letter No. RIII-97-011 NRC Architect Engineer (AE) Design Inspection August 1997," (AEP:NRC:1260G3).
5. Letter from E. E. Fitzpatrick (I&M) to NRC dated December 24, 1997, "Donald C. Cook Nuclear Plant Units 1 and 2, Confirmatory Action Letter (CAL) Supplemental Response," (AEP:NRC:1260G4).
6. Letter from E. E. Fitzpatrick (I&M) to NRC dated January 29, 1998, "Donald C. Cook Nuclear Plant Units 1 and 2, Confirmatory Action Response Validation Inspection Response to Request for Additional Information Regarding Item 3, '36 Hour Cooldown,'" (AEP:NRC: 1260G8).
7. Letter from J. A. Grobe (NRC) to E. E. Fitzpatrick (I&M) dated May 7, 1998, "Inspection Report No. 50-315/98004(DRS); 50-316/98004(DRS) and Confirmatory Action Letter (CAL) No. RIII-97-011 Validation."
8. Letter from R. P. Powers (I&M) to NRC dated March 12, 1999, "Donald C. Cook Nuclear Plants Units 1 & 2, Restart Plan, Revision 5," (AEP:NRC:1260G).
9. Letter from J. A. Grobe (NRC) to R. P. Powers (I&M) dated May 17, 1999, "Expanded System Readiness Review Validation Inspection Schedule and Confirmatory Action Letter Update."

COMMITMENTS

The following table identifies those actions committed to by I&M in this document. 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
None	