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AEP
INDIANA
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U.S. Nuclear Regulatory Commission
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Donald C. Cook Nuclear Plant Units 1 and 2
REMAINING CONFIRMATORY ACTION LETTER ITEM RESOLUTION

In a letter dated September 19, 1997, the NRC Region III Regional Administrator issued a Confirmatory Action Letter (CAL) to Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) (Reference 4). 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 was not required to be completed prior to restart.

On December 2, 1997, I&M submitted its response to the CAL (Reference 5). In that letter, I&M described the efforts undertaken to that point to address the CAL items. NRC inspectors subsequently reviewed I&M's actions and closed several of the CAL items in May 1998 (Reference 8).

In response to issues identified during subsequent engineering self-assessments, I&M initiated the Expanded System Readiness Review (ESRR) to conduct a more rigorous review of CNP systems prior to plant restart. 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, by letter dated March 17, 1999, I&M withdrew its original response to CAL Item 1, and committed to perform a detailed analysis to ensure that the other CAL responses remain valid (References 1 and 10).

In accordance with the commitment made in its March 17 letter to the NRC, I&M has taken steps to verify that its CAL response remains valid in light of its ESRR findings. In a letter to the NRC dated October 25, 1999, I&M verified that three of the nine CAL items (*i.e.*, Items 2, 5, and 6) are closed

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(Reference 2). This letter updates the NRC by discussing resolution of the remaining six CAL items.

Specifically, Attachment 1 to this letter summarizes the actions taken to resolve five of the remaining six CAL items (*i.e.*, Items 1, 4, 7, 8, and 9). With respect to those five CAL items, I&M has confirmed that the bases for closure of two of these CAL items, Items 8 and 9, remain valid as discussed in the original CAL response (Reference 5). In addition, I&M has determined that actions have been taken that resolve CAL Items 1, 4, and 7. Any remaining related work activities for these CAL items have been identified and will be tracked to completion. Since the related work activities are within the scope of currently open NRC Manual Chapter 0350 Case Specific Checklist Items 3C, 13B and 14D, I&M recommends using the MC 0350 process to track these activities to completion. Finally, I&M herein requests that one CAL item – Item 3 – be withdrawn because of its inapplicability to the CNP licensing basis. On these bases, I&M recommends closure of all six remaining CAL items.

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

Sincerely,

R. P. Powers
Senior Vice President

\mjb

Attachments

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

ATTACHMENT 1 TO C1299-16

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 Donald C. Cook Nuclear Plant (CNP) remains valid in light of our Expanded System Readiness Review (ESRR) findings. Based on team reviews, I&M previously verified that CAL Items 2, 5, and 6 are closed (Reference 2). The following provides some background information and a description of the actions to ensure resolution of five of the six remaining CAL items. In addition, I&M herein requests that one CAL item – Item 3 – be withdrawn because of its inapplicability to the CNP licensing basis.

II. BACKGROUND

During September 1997, and in response to an earlier I&M letter (Reference 3), the NRC Region III Regional Administrator issued a CAL to I&M, the licensee for CNP (Reference 4). 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 was not required to be completed prior to restart.

On December 2, 1997, I&M submitted its response to the CAL (Reference 5). 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 6 and 7). NRC inspectors subsequently reviewed I&M's actions and closed several of the CAL items in May 1998 (Reference 8).

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 the "Cook Nuclear Plant Restart Plan" (Reference 9).

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, and committed to perform a detailed analysis to ensure that the other CAL responses remain valid (References 1 and 10).

III. DISCUSSION

On September 24, 1999, I&M met with the NRC in a public meeting to discuss the review process applied to the remaining CAL responses. In summary, to ensure the continuing validity of earlier CAL responses, 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;" and
- assemble a team of engineering, operations, and licensing personnel to determine whether CAL items have been resolved or to identify the work scope remaining for CAL item resolution. This team was directed to review documents associated with closure of the original CAL items, 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 ESRR, the CAL item remains resolved.

As described below, we have concluded that the issues associated with five of the six remaining CAL items (*i.e.*, CAL Items 1, 4, 7, 8, and 9) have been resolved. As further explained below, the original basis for closure of two of these CAL items, Items 8 and 9, remain valid. In addition, we request that CAL Item 3 be withdrawn because of its inapplicability to the CNP licensing basis. Closure packages have been assembled for each of these six CAL items in accordance with our standard validation practices. The following discussion provides a brief summary of the bases for these conclusions.

CAL Item 1 – Recirculation Sump Inventory/Containment Dead Ended Compartments Issue

CAL Item:

"Analyses will be performed to demonstrate that the recirculation sump level is adequate to prevent vortexing, or appropriate modifications will be made." Confirmatory Action Letter (CAL No. RIII-97-011) from Beach (NRC) to Fitzpatrick (I&M), dated September 19, 1997 (Reference 4).

Basis for Issue Resolution:

The containment recirculation sump analysis is complete, input assumptions have been verified, and the plant changes (including changes to the plant Technical Specifications [T/S]) required to support the analysis have been identified. A copy of the analysis has been provided to the NRC and the related containment sump inventory license amendment has received NRC approval. I&M is completing the Design Change Packages (DCP) to implement the plant changes prior to startup.

As NRC Manual Chapter (MC) 0350 Case Specific Checklist Item 13B, "Systems and Containment Final Readiness Review," requires completion of restart-required containment work, related CAL Item 1 work activities are properly managed under this item. Since the required analysis is complete and the remaining related work activities will be completed prior to containment close-out, I&M recommends closure of this CAL item and tracking the remaining activities as Case Specific Checklist Item 13B actions.

CAL Item 3 – Thirty-Six Hour Cooldown with One Train of Cooling

CAL Item:

"Analyses will be performed that will demonstrate the capability to cool down the units consistent with design basis requirements and necessary changes to procedures will be completed." Confirmatory Action Letter (CAL No. RIII-97-011) from Beach (NRC) to Fitzpatrick (I&M), dated September 19, 1997 (Reference 4).

Basis for Determining that this CAL Item Should Be Withdrawn:

The 1997 NRC Architect Engineer (AE) Inspection Report (Reference 11) accurately states T/S 3.0.3 requires that a CNP unit be brought to Cold Shutdown within 36 hours when a limiting condition for operation is not met. The inspection report also extracts a statement from the initial CNP Safety Evaluation Report (SER) that one Component Cooling Water (CCW) pump and one CCW heat exchanger serve the needs of a unit during either full power operation or cooldown. Contrary to the T/S and the SER, however, the inspection team concluded that "the TS 3.0.3 cooldown requirement and the assumption in the staff's Safety Evaluation was to demonstrate that at 100 percent power, the plant would be capable of achieving 200°F within 36 hours, using one train of CCW."

The AE inspection team reviewed a Westinghouse Cooldown Analysis Report and the LOCA/Cooldown Analysis for the Unit 2 Uprating Program to determine compliance with this assumed 36-hour single train cooldown requirement. These analyses addressed the ability of the plant to meet its intended design requirements, which are more restrictive than the design basis and licensing basis. Because of inconsistencies identified in these design

analyses, such as errors in modeling the Residual Heat Removal (RHR) heat exchanger and incorrect heat exchanger flow values, the AE inspection team concluded that the licensee was unable to demonstrate that it could achieve "...the TS-required cooldown of 200° F in 36 hours," (Reference 11).

Following review of the AE inspection team's assumed CCW design basis requirement, I&M concludes that the AE inspection team's finding is not consistent with the CNP licensing basis. Specifically, there is no regulatory basis for applying a system design requirement to a unit cooldown performed to meet T/S 3.0.3. Therefore, there is no requirement to demonstrate unit cooldown capability within 36 hours using only one CCW train.

I&M has also compared the AE inspection team's assumed CCW design basis requirement with applicable T/S performance requirements for other key heat removal systems. For example, if both trains of RHR were inoperable, since the limiting conditions for operation under T/S 3.5.2 could not be met (*i.e.*, having at least one operable RHR pump and heat exchanger), then T/S 3.0.3 would apply. There is, however, no licensing basis requirement to demonstrate the capability to complete a 36-hour cooldown of the unit with both trains of RHR inoperable.

In conclusion, the errors in the design calculation identified during the 1997 AE Inspection have been corrected. However, a review of the design and licensing basis for the CCW system – the system that was the focus of AE inspector comments – and the basis for T/S 3.0.3, has led I&M to conclude that a T/S 3.0.3-required single CCW train 36-hour cooldown is not part of CNP's licensing or design basis. Therefore, I&M requests that this CAL item be withdrawn because of its inapplicability to the CNP licensing basis.

CAL Item 4 – ES-1.3, Switchover to Recirculation Sump Procedure

CAL Item:

"Changes to the emergency procedure used for switchover of the emergency core cooling and containment spray pumps to the recirculation sump will be implemented. These changes will provide assurance there will be adequate sump volume, with proper consideration of instrument bias and single failure criteria." Additionally, the CAL letter describes the "need to ensure the revised procedure is validated and all licensed operating crews are trained on its use." Confirmatory Action Letter (CAL No. RIII-97-011) from Beach (NRC) to Fitzpatrick (I&M), dated September 19, 1997, (Reference 4).

Basis for Issue Resolution:

During the development of procedure 01(02) OHP 4023.ES-1.3, Revision 5, Transfer to Cold Leg Recirculation, in September 1997, I&M could not locate the calculation of record for the Refueling Water Storage Tank (RWST) inventory transfer to the containment sump. During preparation of the alternate calculation and evaluation of the effective containment analysis, I&M determined the potential existed that, under certain circumstances, the volume of water in the containment active sump may not have been adequate to support long term Emergency Core Cooling System (ECCS) or Containment Spray System (CTS) pump operation during the recirculation phase of a Loss of Coolant Accident (LOCA).

Specifically, 01(02) OHP 4023.ES-1.3, Revision 4, directed operators to align both trains of centrifugal charging and safety injection to a single RHR pump ("piggy-back operation") during switchover from injection to recirculation. If this RHR pump failed to continue running, then all high head injection capability would be lost. Low head injection from the failed RHR pump also would be lost. Full CCW flow to the RHR heat exchangers also was delayed, in 01(02) OHP 4023.ES-1.3, Revision 4, until after completion of switchover to recirculation. This sequence resulted in a condition contrary to UFSAR Chapter 14 safety analyses assumptions, which assumed full CCW flow to the RHR heat exchangers upon initiation of switchover to recirculation.

Following issuance of the CAL, 01(02) OHP 4023.ES-1.3, Revision 5, was issued in January 1998 to address the problems identified in Revision 4. Initially, it appeared to I&M that Revision 5 would be responsive to the CAL, and, as documented in the May 7, 1998 NRC Inspection Report (Reference 8), the NRC considered this CAL item closed.

Subsequent Condition Reports (CRs), however, identified additional procedure deficiencies and design uncertainties associated with Revision 5 to the procedure, thereby raising additional questions concerning:

- steps for switchover of the ECCS and CTS pumps to recirculation mode;
- adequate containment recirculation sump inventory during recirculation phase;
- application of instrument uncertainties; and
- potential single failure vulnerabilities.

As a result, I&M placed 01(02) OHP 4023.ES-1.3, Revision 5, on administrative hold on December 8, 1998, to resolve these issues, and generally upgrade the procedure to current industry standards. Although the NRC Staff already considered this issue closed in its May 1998 Inspection Report, I&M decided to further revise 01(02) OHP 4023.ES-1.3 prior to startup to address the plant staff's comments on Revision 5.

In 1999, I&M determined that many CNP Emergency Operating Procedures (EOP) contained deviations from current industry standards and/or the plant licensing basis. In response, I&M formed an EOP Upgrade Project to develop, implement, and maintain an effective EOP program. The EOP Upgrade Project also is included on the 0350 Case Specific Checklist as Item 14D.

The scope of the EOP Upgrade Project includes:

- repairs to the EOP Program, including a development of a new EOP policy document, EOP Users Guide, and Verification and Validation Procedures, along with revisions to the EOP Writers Guide;
- resolution of technical and analysis issues;
- incorporation of ergonomic principles;
- steps to ensure technical correctness; and
- development of an EOP maintenance program.

Under the project controls of the EOP Upgrade Project, I&M has revised EOP procedure 01(02) OHP 4023.ES-1.3 and final EOP procedure validation and crew training are underway. Completion of the EOP Upgrade Project is required to satisfy Case Specific Checklist Item 14D, "Emergency Operating Procedures Program Ready for Restart." Completion of the Case Specific Checklist is required prior to restart and ensures timely resolution of CAL Item 4. Since the procedure has been revised and since the EOP Upgrade Project is being tracked as part of the MC 0350 process, I&M recommends closure of this CAL Item and tracking the related work activities as part of Case Specific Checklist Item 14D.

CAL Item 7 – Fibrous Materials in Containment

CAL Item:

"Removal of Fibrous material from containment that could clog the recirculation sump will be completed." Confirmatory Action Letter (CAL No. RIII-97-011) from Beach (NRC) to Fitzpatrick (I&M), dated September 19, 1997, (Reference 4).

Basis for Issue Resolution:

During the September 1997 Architect Engineer (AE) inspection (Reference 11), fibrous material was identified in a containment electrical cable tray. I&M subsequently identified

the material as a damming material for installing fire stops in cable trays in both Unit 1 and Unit 2 containment buildings, and removed the material from the containment buildings. During walkdowns performed to determine the extent of condition of the issue, I&M identified several instances where wire mesh was used to encapsulate fibrous insulation, which was contrary to applicable specifications. This material was either removed from containment, or encapsulated in accordance with the applicable specifications. I&M determined that the root cause of these conditions was inadequate configuration control of these types of materials.

Subsequently, I&M performed an operability assessment of the "as-left" condition of the containment recirculation sump. The assessment concluded that the sump was capable of performing its function and, therefore, was considered operable in its "as-left" condition. This operability assessment was docketed on January 8, 1998 (Reference 12).

As part of the actions taken in response to this CAL Item, I&M performed comprehensive walkdowns of both containment buildings. As a result of these walkdowns, several thousand pounds of material were identified and removed from the Unit 1 and Unit 2 containment buildings. This material included insulation, coatings, rust, tape, filters, granular charcoal, and other foreign material. The NRC identified these I&M actions as "extensive" in an inspection report for a special inspection covering the period from September 11, 1997, through February 27, 1998.

Additional walkdowns of the containment buildings were performed during the ESRR. During these walkdowns, additional potential debris sources were identified, e.g., labels and tags, which could melt or otherwise become loose debris under accident conditions. CRs were generated to ensure resolution of these issues. Further, containment inspection and Foreign Material Exclusion (FME) procedures were revised to capture the lessons learned during resolution of CAL Item 7.

The root cause for CAL Item 7, i.e., configuration control, is generally being addressed by upgrading I&M's engineering and configuration control processes. With respect to CAL Item 7, I&M has implemented a Containment Recirculation Sump Protection Program. This program was developed to establish:

- the overall standards for debris source configurations in containment relative to sump performance;

- the division of responsibility for implementing the sump protection engineering program and instituting these standards;

- the relationship among the specifications and procedures which implement the program; and

- an action plan outline for program implementation.

This program establishes an appropriate foundation for consistent standards for plant debris source configurations inside containment in order to minimize potential debris impact on containment recirculation sump performance.

Remaining activities related to this CAL item are to evaluate remaining related CRs and to perform a walkdown of containment prior to restart as required by the newly established program. Thus, I&M has determined that the actions required to address this CAL item have been identified and are being tracked to completion. Remaining related CAL Item 7 work activities can be monitored as part of Case Specific Checklist Item 13B, "Systems and Containment Final Readiness Review," which requires completion of restart-required containment work prior to restart. Given the substantial amount of material removed from containment, and the limited scope of work remaining, I&M therefore recommends closure of this CAL item and tracking the remaining activities as Case Specific Checklist Item 13B.

CAL Item 8 – Valve Backleakage to the Refueling Water Storage Tank (RWST)

CAL Item:

"Only two of the six mini-flow recirculation valves have leakage verification tests. Justification will be provided to establish that the total leakage for the six valves is less than 10 gpm to ensure that Part 100 dose rates are not exceeded if containment sump water were to leak back to the RWST during a design basis accident." Confirmatory Action Letter (CAL No. RIII-97-011) from Beach (NRC) to Fitzpatrick (I&M), dated September 19, 1997 (Reference 4).

Basis for Issue Resolution:

The September 1997 AE inspection (Reference 11) identified potential post-LOCA leakage paths back into the RWST for several valves that were not included in a leakage testing program. Subsequent to the AE inspection, I&M identified a total of eight valves per unit that could be relied on to isolate the RWST during recirculation. I&M augmented the CNP In Service Testing Program to include leak test requirements for these 8 valves. The total leakage rate measured was less than the 10 gpm limit. CAL Item 8 was resolved by verifying that the total leakage for the 8 valves was less than 10 gpm. Given completion of the required testing and these test results, this CAL item may be closed.

I&M is pursuing a related issue separately. As part of the ESRR discovery effort, I&M identified additional valves that could be relied upon to isolate the RWST during recirculation. In addition, I&M has performed extensive analyses to support resolution of control room habitability issues to demonstrate compliance applicable dose limits. Once

complete, the control room dose analysis assumptions concerning Emergency Core Cooling System (ECCS) leakage will be more limiting that those associated with off-site dose projections.

The draft revision of the control room operator dose analysis limits the total unfiltered leakage to a value that is more restrictive than the 10 gpm limit identified in the CAL. Leakage back into the RWST (at issue in this CAL item) is only one component of the total unfiltered recirculation loop leakage, and the acceptance value for all credible sources of leakage from the recirculation piping network is now even more restrictive. The draft revision of the control room operator dose analysis also demonstrates that this new, more restrictive leakage criterion ensures Part 100 dose requirements are met. The control room dose reanalysis is scheduled to be submitted to the NRC prior to restart of Unit 2.

CAL Item 9 – Instrument Uncertainties Incorporated into Procedures and Analyses

CAL Item:

"Emergency procedures and other important-to-safety procedures, calculations, or analyses will be reviewed to account for instrument uncertainties." Confirmatory Action Letter (CAL No. RIII-97-011) from Beach (NRC) to Fitzpatrick (I&M), dated September 19, 1997 (Reference 4).

Basis for Issue Resolution:

I&M's review of procedures and analyses for instrument uncertainties was not considered a restart item (Reference 4). The original closure of this CAL item was based upon development of an instrument uncertainty program, i.e., development of appropriate configuration controls. This program is also tracked as Case Specific Checklist Item 3C, "Failure to Consider Instrument Uncertainties, Setpoints and/or Instrument Bias."

I&M has established the scope of the expanded instrument uncertainty program to include:

- Reactor Trip and Engineered Safety Feature Actuation System setpoints;
- Emergency and Abnormal Operating Procedure operator decision points;
- Operations and Test Procedures used to verify Technical Specification compliance;
- plant performance data used in safety analyses; and
- setpoints for plant alarms associated with monitoring T/S compliance.

In addition, I&M is:

- reviewing uncertainty calculations to verify that process measurement effects are properly considered and that existing calculations meet current NRC guidelines; and

- implementing administrative controls to assure that instrument uncertainties are considered in developing or revising procedures, calculations, and analyses.

A significant amount of work has been completed on this post-restart CAL item. Work completion can be inspected as part of Case Specific Checklist Item 3C. While work remains to complete this program, the basis for the original closure of this CAL item remains valid.

IV. CONCLUSION

As a result of team reviews of the CAL items, I&M has determined that eight of nine CAL items are resolved, and that one CAL item, Item 3, should be withdrawn because of its inapplicability to the CNP licensing basis. I&M welcomes follow-on inspection as required to disposition these CAL items. I&M will continue resolving the related work activities as part of its restart process and will support continued inspection and close-out of the remaining Case Specific Checklist items.

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 R. P. Powers (I&M) to NRC dated October 25, 1999, "Donald C. Cook Nuclear Plant Units 1 and 2, Verification of Confirmatory Action Letter Resolution" (C1099-14).

3. 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).

4. Letter from A. B. Beach (NRC) to E. E. Fitzpatrick (I&M) dated September 19, 1997, "Confirmatory Action Letter" (CAL No. RIII-97-011).

5. 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).

6. 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).

7. 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).

8. 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."

9. Letter from R. P. Powers (I&M) to NRC dated December 9, 1999, "Donald C. Cook Nuclear Plants Units 1 & 2, Restart Plan, Revision 6" (C1299-05).

10. 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."

11. Letter from S. A. Richards (NRC) to E. E. Fitzpatrick (I&M) dated November 26, 1997, "Donald C. Cook, Units 1 & 2 Design Inspection (NRC Inspection Report No. 50-315, 316/97-201)."

12. Letter from E. E. Fitzpatrick (I&M) to NRC dated January 8, 1998, "Donald C. Cook Nuclear Plant Units 1 and 2, Document Information Presented During January 8, 1998 Public Meeting," (AEP:NRC:1260G6).

ATTACHMENT 2 TO C1299-16

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	