



March 21, 2001

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10 CFR 50.71(e)

Docket Nos. 50-315  
50-316

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop 0-P1-17  
Washington, D.C. 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2  
COMPLETION OF COMMITMENT RELATED TO THE UFSAR  
REVALIDATION EFFORT

Reference: Letter from R. P. Powers (I&M) to U. S. Nuclear Regulatory Commission Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, Modification Of Commitments Related to the Updated Final Safety Analysis Report (UFSAR) Revalidation Effort," submittal AEP:NRC:1260GE, dated May 4, 1999.

Indiana Michigan Power Company (I&M) committed to perform the following action in the referenced letter.

"Based on the experience gained and lessons learned through completion of the LBR/ESRR [Licensing Bases Review/Expanded System Readiness Review] effort and assessment of the UFSAR revalidation program, I&M will develop a plan to address the remainder of the CNP UFSAR and communicate that plan to the NRC within 90 days of restart of the second unit from the current outage."

The purpose of this letter is to report the completion of this action.

I&M has assessed the effectiveness of the Updated Final Safety Analysis Report (UFSAR) revalidation results. I&M's self-assessment concluded that the discovery efforts associated with the Expanded System Readiness Review (ESRR) and the Licensing Bases Review (LBR) did provide reasonable assurance that, upon correction of identified deficiencies, the UFSAR will be complete and accurate for risk significant information. The ESRR and the LBR reviewed Level 1 systems (maintenance rule systems with safety and accident

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mitigation functions) and Level 2 systems (maintenance rule systems that are not Level 1) and included a review to ensure consistency between the plant's as-built configuration and the UFSAR.

Additionally, I&M concluded that the current programs for processes that result in changes to the UFSAR, including the Design Change Process, License Amendment Process, Corrective Action Program, and other ancillary programs, provide sufficient controls to ensure that required UFSAR changes are identified, that technical and 10 CFR 50.59 reviews are performed, and that the status of pending changes is known at all times. All findings and recommendations identified in the self-assessment have been entered into the Corrective Action Program.

In conclusion, the ESRR and the LBR discovery efforts were determined to be complete and the discrepancies identified by these processes are being resolved within the Corrective Action Program. I&M verified the effectiveness of the methodology used in the ESRR and the LBR to complete the UFSAR validation. Furthermore, I&M concluded the existing programs for technical content updates to the UFSAR provide sufficient controls to ensure compliance with future update requirements. Therefore, no additional plan is necessary and the commitment stated above from the referenced letter is closed.

Should you have any questions, please contact Mr. Ronald W. Gaston, Manager of Regulatory Affairs, at (616) 697-5020.

Sincerely,

A handwritten signature in black ink, appearing to read "S. A. Greenlee", with a large, stylized loop at the end.

S. A. Greenlee  
Director of Design Engineering and Regulatory Affairs

\dmb

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