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SUBJECT: Withdraws response to issue 1 of NRC CAL,dtd 970919.
Comprehensive design review effort in progress to validate
resolution of issue for future operation.

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March 17, 1999

AEP:NRC: 1260GQ

Docket Nos: 50-315
50-316

U. S. Nuclear Regulatory Commission
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Donald C. Cook Nuclear Plant Units 1 & 2
WITHDRAWAL OF RESPONSE TO ISSUE NO. 1 OF THE NRC CONFIRMATORY
ACTION LETTER OF SEPTEMBER 19, 1997, RIII-97-011

Reference: AEP:NRC:1260G3, Response to Confirmatory Action
Letter dated December 2, 1997

Indiana and Michigan Power Company (I&M) provided our responses to the subject NRC Confirmatory Action Letter (CAL) as delineated in the reference. In a recent review associated with our restart efforts, I&M identified potential non-conservatisms related to the assumptions used in our previous containment sump analysis provided in response to CAL Issue 1 in Attachment 2 to the reference letter. Adjusting these earlier assumptions produced lower predicted ice melt rates, which could potentially result in predicted sump levels below the design basis minimum level for certain small-break LOCA cases. Therefore, I&M withdraws our response to CAL Issue No. 1.

In order to address the containment sump inventory issue, a comprehensive design review effort is in progress to validate resolution of this issue for future operation. This design review will ensure resolution of the sump issue as part of the restart plan. Additionally, I&M will review our responses to the CAL letter to ensure they remain valid in consideration of findings that may emerge from the Expanded System Readiness Reviews.

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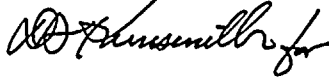
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If you have any questions or wish to discuss this matter further
please contact David F. Kunsemiller at 616-466-2405.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael W. Rencheck", with a long, sweeping horizontal line extending to the right.

Michael W. Rencheck
Vice President - Nuclear Engineering

c: J. A. Abramson
A. C. Bakken,
J. E. Dyer,
MDEQ - DW & RPD
NRC Resident Inspector,

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