

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9905130108 DOC.DATE: 99/05/04 NOTARIZED: NO DOCKET #
 FACIL:50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana M 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316
 AUTH.NAME AUTHOR AFFILIATION
 RENCHECK,M.W. Indiana Michigan Power Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Records Management Branch (Document Control Desk)

SUBJECT: Provides addl background,description & clarification of previous & revised commitments re UFSAR revalidation effort. Commitment change involved alignment of UFSAR revalidation program methodology to strategy contained in current plan.

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 TITLE: OR Submittal: Updated FSAR (50.71) and Amendments

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May 4, 1999

AEP:NRC:1260GE

Docket Nos. 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Donald C. Cook Nuclear Plant Units 1 and 2
MODIFICATION OF COMMITMENTS RELATED TO THE
UPDATED FINAL SAFETY ANALYSIS REPORT (UFSAR) REVALIDATION EFFORT

- References:
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 3. 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," (AEP:NRC:1260G).

Gentlemen:

Indiana Michigan Power Company (I&M) has revised its methodology to review and validate the contents of the Cook Nuclear Plant UFSAR. This methodology was originally presented to the NRC in Reference 1, and modified in several subsequent submittals. This letter and the accompanying attachments provide additional background, description, and clarification of the previous and revised commitments.

In a March 19, 1999 reply to a notice of violation (Reference 2), I&M stated that the UFSAR revalidation scope to be completed prior to restart would be accomplished via the ongoing Licensing Basis Review (LBR) and Expanded System Readiness Review (ESRR) efforts. That commitment change aligned the UFSAR revalidation program methodology to the strategy contained in the current restart plan (Reference 3). This letter clarifies and provides additional detail concerning that commitment change. Attachment 1 to this letter provides a detailed discussion of the previous and revised UFSAR revalidation

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U.S. Nuclear Regulatory Commission
AEP:NRC:1260GE
Page 2 of 2

commitments. Attachment 2 delineates the current commitments related to the UFSAR revalidation program; all previous commitments concerning the UFSAR revalidation program are considered superseded by these commitments.

I&M intends to submit an UFSAR update by July 22, 1999 consistent with the biennial schedule specified in 10 CFR 50.71(e). This submittal will reflect those changes identified through January 22, 1999 which have been reviewed and determined to be acceptable for inclusion in the update. Further plans for updating the UFSAR in connection with the restart effort are detailed in Attachment 1 to this letter.

If there are any questions please contact Mr. David Kunsemiller at (616) 466-2405.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. W. Rencheck", written in a cursive style.

M. W. Rencheck
Vice President Nuclear Engineering

Attachments

cc: J. E. Dyer, w/attachments
MDEQ - DW & RPD
NRC Resident Inspector, w/attachments
R. Whale, Michigan Public Service Commission

ATTACHMENT 1 TO AEP:NRC:1260GE

MODIFICATION OF COMMITMENTS RELATED TO THE
UPDATED FINAL SAFETY ANALYSIS REPORT (UFSAR) REVALIDATION EFFORT

The following discussion describes Indiana Michigan Power Company's (I&M's) previous and revised commitments regarding the Cook Nuclear Plant (CNP) UFSAR.

Previous Commitments

The following discussion outlines the previous commitments made concerning the scope and methodology being used to perform the CNP UFSAR revalidation effort. These commitments are superseded in all respects by the revised commitments detailed in the next section.

By letter dated February 6, 1997,^{1/} I&M responded to an October 9, 1996 NRC request for information pursuant to 10 CFR 50.54(f) regarding the adequacy and availability of design basis information.^{2/} That response indicated that a limited scope review of the UFSAR was conducted in 1996 to evaluate the nature and significance of potential discrepancies between the UFSAR and actual plant design and plant operating procedures, and that based on that effort, a revalidation project was initiated in October 1996. The February 6, 1997 letter provided a general description of a UFSAR Revalidation Project and indicated that it would entail an in-depth, line-by-line review of six representative plant systems and four programs associated with the implementation of plant design, procedural, and regulatory changes. The letter also stated that the review would involve an assessment of relevant technical aspects, e.g., mechanical equipment, electrical power supply, supporting and initiating instrumentation and controls, with emphasis placed on information and data related to tests, configuration description, calibrations, operational modes, operating limits, and functional performance statements. A list of typical information sources to be used in the UFSAR revalidation effort was provided. The four programs selected for review were the UFSAR update process, the 10 CFR 50.59 review process, the design change process, and the operating procedure change process.^{3/} The February 6, 1997 letter stated further that additional UFSAR revalidation efforts would be performed, if necessary, based on the results of this initial effort.

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By letter dated December 24, 1997,^{4/} I&M submitted a supplemental response to a September 19, 1997 confirmatory action letter. In that response, I&M stated that in conjunction with the UFSAR revalidation, a review of the completed Design Basis Documents would be integrated into future UFSAR reviews.

Subsequent to initiation of the UFSAR Revalidation Project, I&M determined that an expansion of the scope of the review was necessary in terms of number of systems to be reviewed. In June 1998, I&M transmitted to the NRC Revision 2 of the CNP Restart Plan.^{5/} Revision 2 of the Restart Plan did not communicate further plans regarding revalidation of the UFSAR, but did indicate that as part of restart readiness assessment, twenty-one plant systems had been selected for review prior to restart of the plant, based on system historical performance and risk significance.

By letter dated July 31, 1998,^{6/} I&M replied to a June 8, 1998 NRC request for information concerning a 2.206 petition.^{7/} The July 31, 1998 letter described I&M's review of the UFSAR, and stated that these reviews would be completed for the selected systems prior to restart. The letter further stated that identified UFSAR discrepancies would be dispositioned in accordance with the restart plan. The July 31, 1998 letter provided as a specific commitment that UFSAR discrepancies would be dispositioned by correcting the non-conformance; performing a 10 CFR 50.59 evaluation, performing an operability evaluation in accordance with generic letter 91-18, Revision 1, or requesting a license amendment.

As part of I&M's UFSAR revalidation efforts, initial UFSAR reviews were completed on the twenty-one systems selected for restart. These initial reviews were performed, using the line by line methodology, using four categories of documents, including the plant Technical Specifications, drawings, calculations, and vendor manuals/system specifications. Issues relating to specific programmatic areas, e.g., environmental qualification, inservice inspection, Generic Letter 89-10 MOV program, etc., were excluded from the scope of this review. The initial reviews required that

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4. 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).
 5. Letter from J. R. Sampson (I&M) to NRC, "D. C. Cook Nuclear Plant Units 1 and 2, Restart Plan," (AEP:NRC:1303), (Date omitted on transmittal letter, PDR entry date June 11, 1998).
 6. Letter from J. R. Sampson (I&M) to NRC dated July 31, 1998, "D. 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).
 7. Letter from J. F. Stang (NRC) to J. R. Sampson (I&M) dated June 8, 1998, "Request For Information Pursuant to 10 CFR 50.54(f) Regarding the 2.206 Petition Filed by the Union of Concerned Scientists on the Donald C. Cook Nuclear Plant, Units 1 and 2."

discrepancies identified during these efforts be documented and tracked for resolution.

Revised Commitments

As discussed in I&M's March 19, 1999 reply to a Notice of Violation,^{8/} the UFSAR revalidation scope to be completed prior to restart will be aligned with the ongoing Licensing Basis Review (LBR) and Expanded System Readiness Reviews (ESRR). These methods, which have been previously used successfully in the industry, focus efforts on risk-significant attributes and are intended to provide reasonable assurance that plant systems are capable of meeting their safety and accident mitigation functions as defined in their design and licensing bases. UFSAR discrepancies identified during these efforts will be addressed in accordance with the criteria contained in the Restart Plan, and the UFSAR revised as appropriate. The revised scope represents an expansion in the number of systems to be reviewed prior to restart.

The previous approach was to perform a line-by-line review of the UFSAR against four categories of documents. Together, the LBR and ESRR efforts represent a more focused and appropriate approach to the UFSAR reviews to be completed prior to restart than the previous methodology. In the current approach, the LBR Project performs a comprehensive review of the UFSAR, Technical Specifications, and available Design Basis Documents to identify system attributes (design, operational or safety function requirements, features or characteristics) for a defined ESRR system and its associated subsystems. The LBR effort includes consideration of the results of the previous UFSAR validation effort and a historical search of the UFSAR update files and the docket to identify and document the basis for and/or the origin of the attribute.

The ESRR employs a vertical slice approach similar to the methodology of a Safety System Functional Inspection (SSFI). A multi-disciplinary review team develops a system assessment matrix based on the system attributes that define the requirements for the systems. The system assessment matrix identifies those topic areas to be included within the scope of the ESRR team review. For identified system attributes, review areas may include design and licensing bases source documents (including available Design Basis Documents), operations and maintenance implementing procedures, surveillances, physical plant inspections, and program implementation and results.

Discrepancies identified in the UFSAR are documented, as appropriate, using Condition Reports in accordance with the CNP corrective action program.

8. 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).

Issues identified during the ESRR and LBR efforts are resolved in accordance with the CNP Restart Plan.^{9/}

Additional UFSAR updates will be prepared and submitted to the NRC within thirty days after reaching Mode 2 on each restarted unit. Additionally, an electronic UFSAR is being developed to provide the means for communicating UFSAR changes to site personnel on an ongoing basis. The electronic UFSAR tool will be available prior to restart of the first unit from the current outage.

I&M will perform an internal assessment of the effectiveness of the UFSAR revalidation program prior to restart from the current outage. Based on the experience gained and lessons learned through completion of the LBR/ESRR 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.

9. 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," (AEP:NRC:1260G).

ATTACHMENT 2 TO AEP:NRC:1260GE

COMMITMENTS

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
The UFSAR revalidation scope to be completed prior to restart will be aligned with the ongoing Licensing Basis Review (LBR) and Expanded System Readiness Reviews (ESRR).	Prior to restart of the first unit from the current outage.
UFSAR discrepancies identified during the LBR/ESRR efforts will be addressed in accordance with the criteria contained in the Restart Plan, and the UFSAR revised as appropriate.	Prior to restart of each unit from the current outage.
Additional UFSAR updates will be prepared and submitted to the NRC within thirty days after reaching Mode 2 on each restarted unit.	30 days following Mode 2 entry on each restarted unit.
An electronic UFSAR tool will be available prior to restart of the first unit from the current outage.	Prior to restart of the first unit from the current outage.
An internal assessment of the effectiveness of the UFSAR revalidation program will be performed prior to restart from the current outage.	Prior to restart of the first unit from the current outage.
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 AUTH.NAME AUTHOR AFFILIATION
 RENCHECK, M.W. Indiana Michigan Power Co.
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May 4, 1999

AEP:NRC:1260GE

Docket Nos. 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

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U.S. Nuclear Regulatory Commission
AEP:NRC:1260GE
Page 2 of 2

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Sincerely,



M. W. Rencheck
Vice President Nuclear Engineering

Attachments

cc: J. E. Dyer, w/attachments
MDEQ - DW & RPD
NRC Resident Inspector, w/attachments
R. Whale, Michigan Public Service Commission

ATTACHMENT 1 TO AEP:NRC:1260GE

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The previous approach was to perform a line-by-line review of the UFSAR against four categories of documents. Together, the LBR and ESRR efforts represent a more focused and appropriate approach to the UFSAR reviews to be completed prior to restart than the previous methodology. In the current approach, the LBR Project performs a comprehensive review of the UFSAR, Technical Specifications, and available Design Basis Documents to identify system attributes (design, operational or safety function requirements, features or characteristics) for a defined ESRR system and its associated subsystems. The LBR effort includes consideration of the results of the previous UFSAR validation effort and a historical search of the UFSAR update files and the docket to identify and document the basis for and/or the origin of the attribute.

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Issues identified during the ESRR and LBR efforts are resolved in accordance with the CNP Restart Plan.^{2/}

Additional UFSAR updates will be prepared and submitted to the NRC within thirty days after reaching Mode 2 on each restarted unit. Additionally, an electronic UFSAR is being developed to provide the means for communicating UFSAR changes to site personnel on an ongoing basis. The electronic UFSAR tool will be available prior to restart of the first unit from the current outage.

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ATTACHMENT 2 TO AEP:NRC:1260GE

COMMITMENTS

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An internal assessment of the effectiveness of the UFSAR revalidation program will be performed prior to restart from the current outage.	Prior to restart of the first unit from the current outage.
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