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 RECIP. NAME RECIPIENT AFFILIATION
 MURLEY, T.E. Document Control Branch (Document Control Desk)

SUBJECT: Responds to JB Hickman 931215 ltr, requesting specific
 commitment to incorporate listing of containment isolation
 valves in UFSAR following issuance of requested amend to
 remove Table 3.6-1 from TS, per GL 91-08.

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AEP:NRC:1178A

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
RESPONSE TO REQUEST TO PROVIDE A COMMITMENT TO INCORPORATE A
LISTING OF CONTAINMENT ISOLATION VALVES IN THE UFSAR
(TAC NOS. M83453 and M83454)

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

Attn: T. E. Murley

March 2, 1994

Dear Dr. Murley:

This letter is submitted in response to Mr. John B. Hickman's December 15, 1993 letter, requesting a specific commitment to incorporate a listing of containment isolation valves (CIVs) in our UFSAR following issuance of a requested amendment to remove Table 3.6-1 from Technical Specifications. Our original amendment request, AEP:NRC:1178, dated September 24, 1992, was written under the guidance of NRC Generic Letter 91-08, "Removal of Component Lists from Technical Specifications." Within this request, we committed to moving the list of CIVs to appropriate controlled documents that would require subsequent proposed changes to undergo an unreviewed safety question determination per 10 CFR 50.59, and also a review by the PNSRC per T/S 6.5.1.6.

To address the request contained in Mr. Hickman's December 15, 1993 letter, a telephone conversation was held with your staff on January 28, 1994. During this conversation, Mr. Hickman agreed that the addition of a reference to a controlled document in Chapter 5.4, of the UFSAR, would be sufficient to address the concerns of the December 15, 1993 letter. In this regard, therefore, we hereby commit to add a reference within Chapter 5.4 of the UFSAR to the appropriate controlled document that will subsume the contents of Table 3.6-1 of the Technical Specifications. This action will take place following issuance of the requested amendment.

In addition, at the time of the original submittal it was believed that the controlled document which would replace Table 3.6-1 of Technical Specifications would be a plant procedure. During the

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development of the existing controlled document, Engineered Control Procedure (ECP) 12-00-28, it was concluded that it would be best to designate one source document for defining the containment boundary and listing the containment isolation valves. This procedure is an engineering document that is controlled at AEPSC and that incorporates specific instructions to perform an unreviewed safety question determination per 10 CFR 50.59 to ensure that any changes to the ECP are subject to the change control provisions in the Administrative Controls Section of the Technical Specifications. Therefore, since the administrative controls as currently envisioned are exercised under the cognizance of the Nuclear Safety and Design Review Committee (NSDRG) and not the PNSRC, we would like to supersede the commitment in AEP:NRC:1178 such that any subsequent proposed changes to the controlled document will be subject to review by the NSDRG, as required by T/S 6.5.2.7, following performance of the unreviewed safety question determination. The requirements of Generic Letter 91-08, that the unreviewed safety question determination for any changes to the controlled document be subject to the change control provisions in the Administrative Controls Section (Chapter 6) of Technical Specifications, will be implemented.

This letter is submitted pursuant to 10 CFR 50.54(f) and, as such an oath statement is attached.

Sincerely,



E. E. Fitzpatrick
Vice President

cad

Attachment

cc: A. A. Blind
G. Charnoff
J. B. Martin - Region III
NFEM Section Chief
NRC Resident Inspector
J. R. Padgett

STATE OF OHIO)
COUNTY OF FRANKLIN)

E. E. Fitzpatrick, being duly sworn, deposes and says that he is the Vice President of licensee Indiana Michigan Power Company, that he has read the forgoing RESPONSE TO REQUEST TO PROVIDE A COMMITMENT TO INCORPORATE A LISTING OF CONTAINMENT ISOLATION VALVES IN THE UFSAR (TAC NOS. M83453 and M83454), and that said contents are true to the best of his knowledge and belief.

E E Fitzpatrick

Subscribed and sworn to before me this 2nd
day of January, 1994.

Rita D. Hill
NOTARY PUBLIC

RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-28-94

