

NRR-PMDAPEm Resource

From: Wengert, Thomas
Sent: Monday, May 19, 2014 12:59 PM
To: kmhenderson@aep.com
Cc: hletheridge@aep.com; 'mkscarpello@aep.com' (mkscarpello@aep.com); Holston, William
Subject: D.C. Cook Nuclear Plant - Request for Additional Information RE: License Renewal Commitment Concerning Buried Piping (TACs MF3094 and MF3095)
Attachments: DC Cook Buried Piping LR Commitment Change Draft RAI #1 Rev 1.docx

By letter dated October 17, 2013 (Agencywide Documents Access and Management System (ADAMS), Accession No. ML13295A422), Indiana Michigan Power Company (I&M) submitted a letter notifying the Nuclear Regulatory Commission (NRC) of a change to a commitment documented in the safety evaluation report (SER) related to the license renewal of the Donald C. Cook Nuclear Plant (CNP), Units 1 and 2.

Attached is the NRC staff's request for additional Information (RAI) for the subject review, as discussed during this morning's RAI clarification conference call. During the call, I&M agreed to provide a response within 30 days.

Please contact me if you have any further questions concerning this RAI.

Tom Wengert
U.S. Nuclear Regulatory Commission
Project Manager – D.C. Cook Nuclear Plant
NRR/DORL/LPL3-1
(301) 415-4037

Hearing Identifier: NRR_PMDA
Email Number: 1291

Mail Envelope Properties (Thomas.Wengert@nrc.gov20140519125900)

Subject: D.C. Cook Nuclear Plant - Request for Additional Information RE: License
Renewal Commitment Concerning Buried Piping (TACs MF3094 and MF3095)
Sent Date: 5/19/2014 12:59:17 PM
Received Date: 5/19/2014 12:59:00 PM
From: Wengert, Thomas

Created By: Thomas.Wengert@nrc.gov

Recipients:

"hletheridge@aep.com" <hletheridge@aep.com>

Tracking Status: None

"mkscarpello@aep.com" (mkscarpello@aep.com) <mkscarpello@aep.com>

Tracking Status: None

"Holston, William" <William.Holston@nrc.gov>

Tracking Status: None

"kmhenderson@aep.com" <kmhenderson@aep.com>

Tracking Status: None

Post Office:

Files	Size	Date & Time	
MESSAGE	857	5/19/2014 12:59:00 PM	
DC Cook Buried Piping LR Commitment Change Draft RAI #1 Rev 1.docx			31494

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received:

REQUEST FOR ADDITIONAL INFORMATION
DONALD C. COOK NUCLEAR PLANT UNITS 1 AND 2
INDIANA MICHIGAN POWER COMPANY
DOCKET NOS. 50-315 AND 50-316

By letter dated October 17, 2013 (Agencywide Documents Access and Management System (ADAMS), Accession No. ML13295A422), Indiana Michigan Power Company (I&M) submitted a letter notifying the Nuclear Regulatory Commission (NRC) of a change to a commitment documented in the safety evaluation report (SER) related to the license renewal of the Donald C. Cook Nuclear Plant (CNP), Units 1 and 2. To complete its review of this commitment change, the NRC staff requests the following additional information.

Background:

By letter dated October 17, 2013, the SER related to the license renewal of the CNP, Units 1 and 2, dated May 2005, Appendix A, Commitment No. 5, was revised to include copper alloy, copper, and iron piping.

License Renewal Application (LRA) Section B.1.6 states an exception to GALL Report AMP XI.M34 as follows:

NUREG-1801 refers to periodic inspections with a scheduled frequency. CNP intends to inspect buried tanks and piping only when excavated during maintenance activities.

SER Section 3.0.3.2.2, "Buried Piping Inspection," documents the NRC staff's evaluation of this exception. The staff's evaluation stated, "the staff finds that the frequency of excavating buried components for maintenance activities will be sufficient to provide reasonable assurance that the applicant will identify the effects of aging before the loss of intended function."

The "operating experience" portion of SER, Section 3.0.3.2.2, states: "[f]ailures of fuel oil tanks and piping have been limited to small leaks resulting from localized corrosion, such as pitting."

It is clear that the NRC staff found the number of maintenance activities associated with excavating buried components to be acceptable; and the staff was aware of the small leaks that have occurred at the station when it accepted the exception related to periodic inspections with a scheduled frequency for buried carbon steel piping. However, based on its review of the LRA, SER, and CNP Audit & Review Report, it is unclear whether: (a) any of the small leaks associated with localized corrosion have been associated with copper alloy or copper piping, and (b) whether the number of maintenance activities associated with excavating copper alloy and copper piping is sufficient. The number of leaks and maintenance inspections associated with copper alloy and copper piping could impact the staff's conclusion of the acceptability of the exception for copper alloy and copper piping.

Request for Additional Information (RAI):

- RAI-01: State whether there have been any leaks in buried in-scope copper alloy or copper piping. If there have been leaks, state when they occurred, the extent of degradation, and the cause of the leakage, if known.
- RAI-02: State how many excavated direct visual examinations have been conducted of in-scope buried copper alloy or copper piping in the 10-year period prior to the period of extended operation. If excavated direct visual examinations of buried copper alloy or copper piping that is not in-scope has been conducted and the coating and soil environment (e.g., backfill specifications, moisture) is the same, state how many have been conducted.
- RAI-03: If the number of direct visual examinations of buried copper alloy and copper piping in the 10-year period prior to the period of extended operation has been less than that recommended in LR-ISG-2011-03, "Changes to the Generic Aging Lessons Learned (GALL) Report Revision 2 Aging Management Program (AMP) XI.M41, 'Buried and Underground Piping and Tanks'," Table 4a., "Inspections of Buried Pipe," considering the associated table footnotes (e.g., cathodic protection availability, backfill quality, soil corrosivity), state the minimum number of inspections that will be conducted in each 10-year period of the period of extended operation.
- RAI-04: Provide a marked-up copy of the revised Updated Final Safety Analysis Report (UFSAR) Section 15.1.6, to reflect the appropriate level of detail as described in LR-ISG-2011-03, "Changes to the Generic Aging Lessons Learned (GALL) Report Revision 2 Aging Management Program (AMP) XI.M41, 'Buried and Underground Piping and Tanks'," Table 3.0-1.