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Docket Nos. 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Unit 1 and Unit 2
COMMITMENT SCHEDULE CHANGE RELATED TO
TECHNICAL SPECIFICATION TASK FORCE-523

References:

1. U. S. Nuclear Regulatory Commission (NRC) Generic Letter 2008-01, Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems, dated January 11, 2008, Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759.
2. Letter from L. J. Weber, Indiana Michigan Power Company (I&M), to NRC, Nine-Month Response to NRC Generic Letter 2008-01 issued pursuant to 10 CFR 50.54(f), "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated October 14, 2008, ADAMS Accession No. ML082950467.
3. Letter from J. P. Gebbie, I&M, to NRC, Evaluation of TSTF-523 "Generic Letter 2008-01, Managing Gas Accumulation," dated March 7, 2014, ADAMS Accession No. ML14070A344.
4. NRC Memorandum from J. Holonich to A.J. Mendiola re: Minutes From Aug 19, 2014 Meeting on Gas Voids NEI Version, dated October 1, 2014, ADAMS Accession No. ML14266A168.

Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP), Units 1 and 2, is providing notification of a change to a regulatory commitment that was documented in Reference 3. I&M has revised the completion date to submit a license amendment request (LAR) for technical specification (TS) revisions related to Technical Specification Task Force (TSTF)-523, Generic Letter 2008-01, Managing Gas Accumulation.

In Reference 1, the U. S. Nuclear Regulatory Commission (NRC) requested information from licensees regarding how they protect certain safety systems from the accumulation of air, nitrogen, or other gases that could cause the systems to become inoperable. The Generic Letter (GL) requested

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licensees to evaluate their emergency core cooling system (ECCS), residual heat removal (RHR), and containment spray (CTS) systems in order to determine how their licensing basis, design, testing, and corrective actions ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

In addition, the NRC requested licensees to provide a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule. I&M provided a response to Reference 1 for CNP in Reference 2. Reference 2 contained the following commitment to provide an evaluation of TSTF-523 within 60 days of NRC approval of TSTF-523:

"Evaluate the TSTF Traveler for gas accumulation to either supplement or replace the current TS requirements."

Notice of Availability for adopting TSTF-523 under the Consolidated Line Item Improvement Process was provided in 79 FR 2700 on January 15, 2014. I&M satisfied the Reference 2 commitment by letter dated March 7, 2014 (Reference 3), which concluded that additional analysis is required to determine the actions necessary to ensure the ECCS, RHR, and CTS systems are capable of performing their specified safety functions and that these systems are in compliance with their licensing basis with respect to the concerns outlined in GL 2008-01. As a result, a new commitment was made in Reference 3 related to TSTF-523, as stated below:

"Conduct additional technical evaluation of Emergency Core Cooling Systems, Residual Heat Removal System, and Containment Spray System for gas accumulation. Upon completion of the evaluation, submit a license amendment request to adopt the appropriate portions of TSTF-523."

The commitment change identified in this letter applies only to extension of the completion date. The commitment wording is unchanged and continues to specify TSTF-523 as the basis of the proposed license amendment.

In Reference 3, I&M committed to perform additional analysis of gas accumulation issues at CNP and submit a LAR by June 30, 2015. However, as recognized in the memorandum dated October 1, 2014, to Licensing Processes Branch Chief Anthony J. Mendiola (Reference 4), there is uncertainty in the industry regarding the NRC endorsed guidance for implementing TSTF-523 (i.e., RIS 2013-09 and NEI 09-10 Revision 1a-A). Concurrently, I&M was evaluating bids from various vendors for performing site-specific analysis of the potentially affected systems. Although industry resolution of the uncertainties detailed in Reference 4 has not occurred, I&M has determined that the necessary analysis should be performed notwithstanding the uncertainties. I&M has recently chosen a vendor to perform the analysis and the schedule for completion of the analysis would not allow for a June 30, 2015, LAR submittal. Therefore, I&M is submitting this letter to notify the NRC that the commitment to submit a LAR has been extended to January 29, 2016, to allow time for additional analysis to be performed prior to implementing TSTF-523.

This letter contains no new regulatory commitments and one revised regulatory commitment due date, as summarized in the enclosure to this letter. Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Manager, at (269) 466-2649.

Sincerely,



Joel P. Gebbie
Site Vice President

TLC/ams

Enclosure: Donald C. Cook Nuclear Plant Regulatory Commitment

c: A. W. Dietrich, NRC, Washington, D.C.
J. T. King – MPSC
MDEQ – RMD/RPS
NRC Resident Inspector
C. D. Pederson, NRC, Region III
A. J. Williamson, AEP Ft. Wayne, w/o enclosures

Enclosure to AEP-NRC-2015-37

**Donald C. Cook Nuclear Plant
Regulatory Commitment**

The following table identifies the action committed to by Indiana Michigan Power Company for implementation of Technical Specification Task Force (TSTF)-523 at Donald C. Cook Nuclear Plant. Any other actions discussed in this submittal represent intended or planned actions by I&M. They are described to the U. S. Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

Commitment	Completion Date
Conduct additional technical evaluation of Emergency Core Cooling Systems, Residual Heat Removal System, and Containment Spray System for gas accumulation. Upon completion of the evaluation, submit a license amendment request to adopt the appropriate portions of TSTF-523.	January 29, 2016