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June 16, 2016

AEP-NRC-2016-54
10 CFR 50.90

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
Response to Request for Additional Information Regarding the License Amendment
Request to Adopt TSTF-425, Relocate Surveillance Frequencies to Licensee Control - Risk Informed
Technical Specification Task Force (RITSTF) Initiative 5B

References:

1. Letter from J. P. Gebbie, Indiana Michigan Power Company (I&M), to U. S. Nuclear Regulatory Commission (NRC), "Donald C. Cook Nuclear Plant Units 1 and 2 License Amendment Request to Adopt TSTF-425-A, Revision 3, 'Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5B'," dated November 19, 2015, Agencywide Documents Access and Management System (ADAMS) Accession No. ML15328A450.
2. Letter from Q. Shane Lies, I&M, to NRC, "Donald C. Cook Nuclear Plant Units 1 and 2 Supplement License Amendment Request to Adopt TSTF-425-A, Revision 3, 'Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5B'," dated February 4, 2016, ADAMS Accession No. ML16039A240.
3. Letter from A. W. Dietrich, NRC, to J. P. Gebbie, I&M, "Donald C. Cook Nuclear Plant, Units 1 and 2 – Request for Additional Information Regarding License Amendment Request to Relocate Surveillance Frequencies to Licensee Control (CAC Nos. MF7114 and MF7115)," dated June 9, 2016, ADAMS Accession No. ML16154A182.

This letter provides Indiana Michigan Power Company's (I&M), licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, response to the Second Request for Additional Information (RAI) by the U. S. Nuclear Regulatory Commission (NRC) regarding a License Amendment Request (LAR) to adopt Technical Specification Task Force (TSTF)-425-A, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5B."

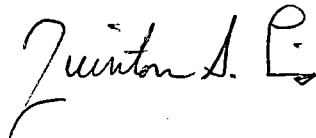
ADD
NRR

By Reference 1, as supplemented by Reference 2, I&M submitted a request to amend the Technical Specifications to CNP Units 1 and 2 Renewed Facility Operating Licenses DPR-58 and DPR-74 to adopt TSTF-425, Revision 3. By Reference 3, the NRC transmitted the Second RAI regarding the LAR submitted by I&M in Reference 1. Enclosure 1 to this letter provides an affirmation statement. Enclosure 2 to this letter provides I&M's response to the RAI contained in Reference 3.

Copies of this letter are being transmitted to the Michigan Public Service Commission and Michigan Department of Environmental Quality, in accordance with the requirements of 10 CFR 50.91.

There are no new regulatory commitments made in this letter. Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Manager, at (269) 466-2649.

Sincerely,



Q. Shane Lies
Site Vice President

DB/ml

Enclosures:

1. Affirmation
2. Response to Second Request for Additional Information Regarding the License Amendment Request to Adopt TSTF-425, Relocate Surveillance Frequencies Program to Licensee Control

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

Enclosure 1 to AEP-NRC-2016-54

AFFIRMATION

I, Q. Shane Lies, being duly sworn, state that I am the Site Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the U. S. Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

Indiana Michigan Power Company



Q. Shane Lies
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 16 DAY OF June, 2016



Notary Public

My Commission Expires 04-04-2018

DANIELLE BURGOYNE
Notary Public, State of Michigan
County of Berrien
My Commission Expires 04-04-2018
Acting in the County of Berrien

Enclosure 2 to AEP-NRC-2016-54

Response to Second Request for Additional Information Regarding the License Amendment Request to Adopt TSTF-425, Relocate Surveillance Frequencies Program to Licensee Control

By letter dated November 19, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15328A450), as supplemented by letter dated February 4, 2016 (ADAMS Accession No. ML16039A240), Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP), Units 1 and 2, submitted a request to amend the Technical Specifications to CNP Units 1 and 2 Renewed Facility Operating Licenses DPR-58 and DPR-74 to adopt Technical Specification Task Force (TSTF)-425, Revision 3.

The U. S. Nuclear Regulatory Commission (NRC) staff is currently reviewing the submittal, as supplemented, and has determined that additional information is needed in order to complete the review. The request for additional information (RAI) and I&M's response is provided below.

RAI-TS-1

The U.S. Nuclear Regulatory Commission (NRC) regulatory requirements related to the content of the Technical Specifications (TSs) Surveillance Requirements (SRs) are contained in Title 10 of the Code of Federal Regulations (10 CFR) Section 50.36(c)(3). Per 10 CFR 50.36(c)(3), SRs are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

During the NRC staff's review of a change to ensure that the change is in accordance with 10 CFR 50.36, the staff uses NUREG-0800, Standard Review Plan, Chapter 16, Technical Specifications, as well as NUREG-1431, Revision 4, "Standard Technical Specifications, Westinghouse Plants," which contains approved TSTF-425, Revision 3, as guidance. According to this guidance, the language in the proposed TS changes must be the same or equivalent to that in the current TS unless there is adequate technical or administrative reasoning supporting the change.

The current SRs 3.6.9.1 and 3.6.9.2 for the Donald C. Cook Nuclear Plant, Unit 1, each contain reference to a footnote 3 in the frequency column. There is no provision provided in the approved TSTF-425, Revision 3 for transfer of surveillance frequencies containing a footnote to the licensee controlled surveillance frequency control program. Please explain this apparent deviation from the approved TSTF-425, Revision 3

I&M Response to RAI-PRA-1:

By References 1 and 2, I&M submitted a License Amendment Request (LAR) to adopt TSTF-425, Revision 3. TSTF-425, Revision 3 does not contain provisions for footnotes. CNP current TS differ from Standard Technical Specifications due to a Footnote 3 contained in SR 3.6.9.1 and SR 3.6.9.2 and is therefore a deviation to TSTF-425. I&M would like to request the following deviation to allow Footnote 3 to be removed from SR 3.6.9.1 and SR 3.6.9.2. Footnote 3 was a fuel cycle

dependent footnote requested by References 3, 4, and 5, and approved by the NRC by Reference 6. This footnote is now obsolete, as it was only valid through the remainder of Fuel Cycle 25, and the current fuel cycle is 27. Enclosure 4 of Reference 1 contained the marked up SR 3.6.9.1 and SR 3.6.9.2 which had the footnote struck-through; however, this deviation discussion was inadvertently omitted in the original LAR (Reference 1).

References:

1. Letter from J. P. Gebbie, Indiana Michigan Power Company (I&M), to U. S. Nuclear Regulatory Commission (NRC), "Donald C. Cook Nuclear Plant Units 1 and 2 License Amendment Request to Adopt TSTF-425-A, Revision 3, 'Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5B'," dated November 19, 2015, Agencywide Documents Access and Management System (ADAMS) Accession No. ML15328A450.
2. Letter from Q. Shane Lies, I&M, to NRC, "Donald C. Cook Nuclear Plant Units 1 and 2 Supplement License Amendment Request to Adopt TSTF-425-A, Revision 3, 'Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5B'," dated February 4, 2016, ADAMS Accession No. ML16039A240.
3. Letter from J. P. Gebbie, I&M, to NRC, "Donald C. Cook Nuclear Plant Unit 1 Emergency License Amendment Request Regarding Containment Distributed Ignition System," dated October 7, 2013, ADAMS Accession No. ML13283A084.
4. Letter from J. P. Gebbie, I&M, to NRC, "Donald C. Cook Nuclear Plant Unit 1 Response to Request for Additional Information Regarding the Emergency License Amendment Request Regarding Containment Distributed Ignition System," dated October 8, 2013, ADAMS Accession No. ML13284A074.
5. Letter from J. P. Gebbie, I&M, to NRC, "Donald C. Cook Nuclear Plant Unit 1 Supplement to the Response to Request for Additional Information Regarding the Emergency License Amendment Request Regarding Containment Distributed Ignition System," dated October 9, 2013, ADAMS Accession No. ML13284A073.
6. Letter from T. J. Wengert, NRC, to L. J. Weber, NRC, "Donald C. Cook Nuclear Plant, Unit 1 - Issuance of Amendment Re: Revision to Technical Specification 3.6.9, "Distributed Ignition System (DIS)" (Emergency Circumstances) (TAC No. MF2887)," dated October 9, 2013, ADAMS Accession No. ML13282A214.