



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 15, 2016

LICENSEE: Indiana Michigan Power Company, LLC

FACILITY: Donald C. Cook Nuclear Plant, Units 1 and 2

SUBJECT: SUMMARY OF JULY 7, 2016, MEETING WITH INDIANA MICHIGAN POWER COMPANY REGARDING DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 (CAC NOS. MF7778 and MF7779)

On July 7, 2016, a Category I public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Indiana Michigan Power Company (I&M, the licensee) via teleconference. This meeting was open to members of the public. No regulatory decisions were made at this meeting.

The purpose of the meeting was to discuss a planned license amendment request (LAR) for Donald C. Cook Nuclear Plant (CNP), Units 1 and 2. The licensee plans to submit a request to remove the containment humidity monitors from technical specification (TS) 3.4.15, "[Reactor Coolant System (RCS)] Leakage Detection Instrumentation." The meeting notice and agenda, dated June 16, 2016, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML16168A426. A list of attendees is included as Enclosure 1. A handout was provided by the licensee, and is included as Enclosure 2. The handout includes the licensee's major discussion topics, as well as excerpts from TS 3.4.15 for CNP, Unit 1 and CNP, Unit 2.

The licensee presented information regarding its plan to submit the LAR in January 2017, and to request approval within the normal NRC review timeline. I&M briefly discussed the purpose of the LAR, and the technical justification for removing the containment humidity monitors. The licensee stated its intention to change TS 3.4.15 to be consistent with NUREG-1431, Standard Technical Specifications – Westinghouse Plants (ADAMS Accession No. ML12100A222), and to meet the intent of Regulatory Guide 1.45, Revision 0 (ADAMS Accession No. ML003740113). The licensee also stated that it would be revising the TS actions consistent with Technical Specifications Task Force (TSTF) Traveler TSTF-513, Revision 3, "Revise [Pressurized Water Reactor (PWR)] Operability Requirements and Actions for RCS Leakage Instrumentation" (ADAMS Accession No. ML102360355).

The NRC staff recommended that the licensee closely review TSTF-513 and the associated model safety evaluation to ensure that the technical bases in TSTF-513 are applicable to CNP. The NRC staff also stated that LAR should include the licensing basis for CNP TS 3.4.15, and an explanation of how the LAR complies with the CNP plant-specific design criteria. Additionally, the NRC staff stated that the LAR should include a discussion of any effect that the changes may have on the CNP updated final safety analysis report Chapter 14 safety analyses.

Members of the public were not in attendance. Public Meeting Feedback forms were not received. Please direct any inquiries to me at 301-415-2846, or Allison.Dietrich@nrc.gov.

A handwritten signature in black ink, appearing to read "Allison Dietrich". The signature is written in a cursive style with a large initial "A".

Allison W. Dietrich, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosure:

1. List of Attendees
2. Licensee Handout

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LIST OF ATTENDEES

JULY 7, 2016, PUBLIC MEETING WITH I&M, LLC

DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2

PLANNED LICENSE AMENDMENT REQUEST REGARDING TS 3.4.15

Name	Organization
Jerome Bettle	NRC
Kristy Bucholtz*	NRC
Allison Dietrich	NRC
Matthew Hamm	NRC
Richard Stattel	NRC
Hang Vu	NRC
Helen Kish*	I&M
Joe Tanko*	I&M
Allen Edwards*	I&M
Shaun Buck*	I&M
Scott Schneider*	I&M
Ted Dey*	I&M
Jeff Hudson*	I&M

*Participated by phone

Enclosure 2

Licensee Handout

Cook Nuclear Plant Pre-Submission License Amendment Request Discussion for Containment Humidity Monitoring

What: Delete containment humidity monitor from Technical Specification (TS) 3.4.15.c “One containment humidity or containment atmosphere gaseous radioactivity monitor.” and revise U1 TS to be consistent with Unit 2 TS and NUREG 1431 and revise ACTIONS consistent with TSTF-513

Why: The Unit 1 and Unit 2 containment humidity monitors are obsolete. Significant resources are needed to maintain this equipment and each instance of maintenance causes dose to be acquired because the instruments are located in lower containment. The average yearly cost is \$100,000.

Justification: The proposed request would result in TS 3.4.15 being consistent with NUREG-1431 and also meeting the intent of Regulatory Guide 1.45, Revision 0, Section 3 of the Regulatory Position which states:

“At least three separate detection methods should be employed and two of these methods should be (1) sump level and flow monitoring and (2) airborne particulate radioactivity monitoring. The third method may be selected from the following:

- a. monitoring of condensate flow rate from air coolers,*
- b. monitoring of airborne gaseous radioactivity*

Humidity, temperature or pressure monitoring of the containment atmosphere should be considered as alarms or indirect indication of leakage to the containment.”

CNP would continue to maintain the three required methods above (monitoring sump level and flow monitoring, airborne particulate radioactivity monitoring, and monitoring airborne gaseous radioactivity) as detailed in RG 1.45, and would also continue to have temperature and pressure monitoring as indirect indications of leakage in containment.

A historical review was conducted of actual plant data for the currently installed containment humidity monitoring instrumentation ability to detect less than TS allowable RCS leakage. Two instances were identified in which RCS leakage in containment was identified by other monitored parameters, but were not detected by the containment humidity monitoring instrumentation.

Timeline: CNP intends to submit this LAR in early 2017 and would request a normal NRC review timeline from that point.

Unit 1 TS prior to STS:

3/4 **LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS**
3/4.4 **REACTOR COOLANT SYSTEM**

3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGE

LEAKAGE DETECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

- 3 4.6.1 The following Reactor Coolant System leakage detection systems shall be OPERABLE:
- a. One of the containment atmosphere particulate radioactivity monitoring channels (ERS-1301 or ERS-1401),
 - b. The containment sump level and flow monitoring system, and
 - c. Either the containment humidity monitor or one of the containment atmosphere gaseous radioactivity monitoring channels (ERS-1305 or ERS-1405)

APPLICABILITY. MODES 1, 2, 3 and 4.

Unit 1 Current TS (STS):

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.15 RCS Leakage Detection Instrumentation

- LCO 3.4.15 The following RCS leakage detection instrumentation shall be OPERABLE:
- a. One containment sump monitor in each sump;
 - b. One containment atmosphere particulate radioactivity monitor; and
 - c. One containment humidity or containment atmosphere gaseous radioactivity monitor.

APPLICABILITY: MODES 1, 2, 3, and 4.

Unit 2 TS prior to STS:

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.4 REACTOR COOLANT SYSTEM

3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGE

LEAKAGE DETECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.4.6.1 The following Reactor Coolant System leakage detection systems shall be OPERABLE:

- a. One of the containment atmosphere particulate radioactivity monitoring channels (ERS-2301 or ERS-2401).
- b. The containment sump level and flow monitoring system, and
- c. Either the containment humidity monitor or one of the containment atmosphere gaseous radioactivity monitoring channels (ERS-2305 or ERS-2405).

APPLICABILITY: MODES 1, 2, 3 and 4

Unit 2 Current TS (STS):

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.15 RCS Leakage Detection Instrumentation

LCO 3.4.15 The following RCS leakage detection instrumentation shall be OPERABLE:

- a. One containment sump monitor in each sump;
- b. One containment atmosphere radioactivity monitor (gaseous or particulate); and
- c. One containment humidity monitor.

APPLICABILITY: MODES 1, 2, 3, and 4.

Members of the public were not in attendance. Public Meeting Feedback forms were not received. Please direct any inquiries to me at 301-415-2846, or Allison.Dietrich@nrc.gov.

/RA/

Allison W. Dietrich, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosure:

1. List of Attendees
2. Licensee Handout

cc w/encl: Distribution via Listserv

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ADAMS Accession Nos.: Mtg Summary: ML16193A591; Handouts: ML16193A594

OFFICE	DORL/LPL3-1/PM	DORL/LPL3-1/LA	DORL/LPL3-1/BC	DORL/LPL3-1/PM
NAME	ADietrich	SRohrer	DWrona	ADietrich
DATE	7/11/2016	7/12/2016	7/15/2016	7/15/2016

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