



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

August 1, 2016

Mr. Joel P. Gebbie  
Senior Vice President and  
Chief Nuclear Officer  
Indiana Michigan Power Company  
Nuclear Generation Group  
One Cook Place  
Bridgman, MI 49106

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 – FOLLOW-UP  
REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE  
AMENDMENT REQUEST TO RELOCATE SURVEILLANCE FREQUENCIES TO  
LICENSEE CONTROL (CAC NOS. MF7114 AND MF7115)

Dear Mr. Gebbie:

By letter dated November 19, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15328A469), as supplemented by letter dated February 4, 2016 (ADAMS Accession No. ML16039A240), Indiana Michigan Power Company (I&M, the licensee) submitted a license amendment request for the Donald C. Cook Nuclear Plant, Units 1 and 2. The proposed changes are consistent with the U.S. Nuclear Regulatory Commission (NRC)-approved Technical Specifications Task Force (TSTF) Traveler, TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – [Risk Informed Technical Specifications Task Force] Initiative 5b." The proposed change would relocate surveillance frequencies to a licensee controlled program, the Surveillance Frequency Control Program.

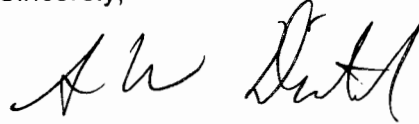
The NRC staff issued a request for additional information (RAI) related to probabilistic risk assessment on May 11, 2016 (ADAMS Accession No. ML16127A079). I&M responded by letter dated June 16, 2016 (ADAMS Accession No. ML16173A256). The NRC staff has determined that additional information is needed in order to complete the review, as described in the enclosed follow-up RAI. The draft follow-up RAI was sent to I&M via electronic mail on July 20, 2016. The NRC staff clarified the draft RAI in a conference call conducted on July 26, 2016. During a phone call with Helen Kish of your staff on July 29, 2016, it was agreed that a response would be provided by September 9, 2016. Please note that if you do not respond to this letter by the agreed-upon date, we may deny your application for amendment under the provisions of Title 10 of the *Code of Federal Regulations*, Section 2.108.

J. Gebbie

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Please feel free to contact me at (301) 415-2846 if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Allison W. Dietrich". The signature is fluid and cursive, with the first name "Allison" and last name "Dietrich" clearly distinguishable.

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:  
Request for Additional Information

cc: Distribution via Listserv

FOLLOW-UP REQUEST FOR ADDITIONAL INFORMATION  
REGARDING LICENSE AMENDMENT REQUEST TO  
RELOCATE SURVEILLANCE FREQUENCIES TO LICENSEE CONTROL  
DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-315 AND 50-316  
CAC NOS. MF7114 AND MF7115

Request for Additional Information-Probabilistic Risk Assessment (RAI-PRA-1-01)

In response to RAI-PRA-1, Indiana Michigan Power Company (I&M, the licensee) stated that the dispositions to the Facts and Observations (F&Os) on the pre-initiator Human Reliability Analysis (HRA) from the license amendment request (LAR) have been "replaced by a new analysis," similar to a methodology used by other licensees. Based on this response, it would seem that the methodology for pre-initiator HRA is a new methodology and constitutes a PRA upgrade as stated in the American Society of Mechanical Engineers/American Nuclear Society (ASME/ANS) PRA standard, in that "new should be interpreted as new to the subject PRA even though the methodology in question has been applied in other PRAs" (Section 1-A.1 of ASME/ANS RA-Sa-2009). Specifically cited as "Example 24" in Section 1-A.3.24 of ASME/ANS RA-Sa-2009 is that employing a different HRA approach to human error analysis constitutes a PRA upgrade.

- a) If the "new analysis" fits the definition and criteria of ASME/ANS RA-Sa-2009 of a new methodology, and, therefore, a PRA upgrade, perform a focused scope peer review on the affected supporting requirements (i.e., at a minimum, those related to HRA in the applicable parts of ASME/ANS RA-Sa-2009), and provide the F&O's with a description of the impact to the TSTF-425 program.
- b) If the "new analysis" does not fit the definition and criteria of a new methodology, explain why it does not fit the definition of a PRA upgrade as defined in the ASME/ANS standard.

RAI-PRA-11-01

Regulatory Guide 1.200 directs that the risk perspective used in a risk-informed application is based on a consideration of the total risk, which includes contributions from initiating events whose causes are attributable to both internal and external hazards. I&M's LAR and response to RAI-PRA-11 does not explain how the external hazards evaluated in the licensee's Individual Plant Examination of External Events are updated to reflect new information when used in performing a qualitative or bounding analysis. Hazard characteristics can change over time due to physical changes and changes in the available information.

Enclosure

- Discuss the process for incorporating new information in these qualitative or bounding analyses and how this process adequately supports implementation of the surveillance frequency control program.

RAI-PRA-12-01

In Enclosure 3, "Revised Regulatory Commitments," to the RAI response dated June 16, 2016, I&M discussed a number of F&Os whose dispositions will be incorporated into the PRA of record prior to program implementation. The completion of these actions is necessary in order for the NRC staff to conclude that the LAR is acceptable. Such commitments are normally elevated to license conditions.

- Provide these commitments as license conditions, or provide justification for not including them.

J. Gebbie

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Please feel free to contact me at (301) 415-2846 if you have any questions or concerns.

Sincerely,

**/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

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Request for Additional Information

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JEvans, NRR

LFields, NRR

**ADAMS Accession No.: ML16211A015**

\*via memorandum

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