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

November 16, 2016

LICENSEE: Indiana Michigan Power Company, LLC

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

SUBJECT: SUMMARY OF OCTOBER 27, 2016, PUBLIC MEETING WITH INDIANA MICHIGAN POWER COMPANY REGARDING THE DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 (CAC NOS. MF7114 AND MF7115)

On October 27, 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) at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. This meeting was open to members of the public. The meeting notice and agenda, dated October 21, 2016, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML16295A375. A list of attendees is provided as Enclosure 1. The licensee's presentation is provided as Enclosure 2.

Purpose

The purpose of the meeting was to discuss the license amendment request (LAR) dated November 19, 2015, for the Donald C. Cook Nuclear Plant, Units 1 and 2 (ADAMS Accession No. ML15328A469). The proposed amendment is consistent with the NRC-approved Technical Specifications Task Force (TSTF) Traveler, TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b." The proposed change would relocate surveillance frequencies to a licensee-controlled program, the Surveillance Frequency Control Program. The meeting focused on a recent upgrade to the licensee's probabilistic risk assessment (PRA), which was performed in support of the LAR.

Background

During the meeting, the NRC staff presented a background of the LAR review thus far. A summary of the background follows.

The NRC staff's review of the licensee's LAR to adopt TSTF-425 has included two requests for additional information (RAIs) related to PRA. The NRC staff issued the first RAI by letter dated May 11, 2016 (ADAMS Accession No. ML16127A079). In the first RAI, the NRC requested that the licensee explain the disposition of certain facts and observations (F&Os) for pre-initiator human failure events. The licensee responded by letter dated June 16, 2016 (ADAMS Accession No. ML16173A256). In the June 16, 2016, letter, the licensee stated that it had performed a new pre-initiator Human Reliability Analysis (HRA) to resolve the F&O.

The NRC staff issued the second RAI by letter dated August 1, 2016 (ADAMS Accession No. ML16211A015). In the August 1, 2016, letter, the NRC stated that if the new analysis constituted a PRA upgrade, the licensee would need to perform a focused scope peer review and provide the F&Os to the NRC, along with their dispositions and impact on the LAR. The

licensee responded to the second RAI by letter dated September 9, 2016 (ADAMS Accession No. ML16258A145). In the September 9, 2016, letter, the licensee stated that the new pre-initiator analysis does constitute a PRA upgrade, and that a focused-scope peer review would be scheduled for the fourth quarter of 2016.

On October 11, 2016, the licensee submitted an emergency LAR (ADAMS Accession No. ML16287A615) that was unrelated to the TSTF-425 review, but that included discussion about the HRA focused scope peer review that had been recently performed. The NRC staff reviewed the information that was submitted and issued an RAI on October 13, 2016, related to the scope of review and applicability of Supporting Requirements from the PRA Standard (ADAMS Accession No. ML16291A011). The licensee then determined that it did not need the emergency amendment, and the LAR was withdrawn by letter dated October 13, 2016 (ADAMS Accession No. ML16291A496), before an RAI response was submitted to the NRC.

On October 21, 2016, a telephone conference was held to inform the licensee that the NRC staff was prepared to deny the TSTF-425 LAR, as submitted. The basis for denial was that the LAR lacked an analysis that was necessary for the NRC staff's review. Specifically, the licensee incorporated a new method into its PRA model without performing a focused scope peer review and providing the F&Os and impact assessments to the NRC. Additionally, the licensee did not fully respond to the NRC RAI dated August 1, 2016, rather the response only contained a promise for future information. On the October 21, 2016, phone call, the NRC staff offered the licensee the opportunity to withdraw the TSTF-425 LAR, or to request a public meeting for further discussion of the issues. The licensee requested a public meeting.

Technical Discussion

During the meeting, the licensee presented information regarding the status of the focused scope peer review on HRA pre-initiators. The presentation given by the licensee is included as Enclosure 2 of this meeting summary. The licensee stated that it had completed a focused scope peer review of its pre-initiator HRA. The licensee provided a table of the high level requirements (HLRs) from the PRA standard, ASME/ANS RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," along with the result of the focused scope peer review for each applicable HLR.

The licensee stated that the documentation for the focused scope peer review was finalized on October 11, 2016, and that a full response to the August 1, 2016, RAI could be provided by November 4, 2016. The licensee stated that it would provide a copy of the complete focused scope peer review report with the RAI response.

The NRC staff asked the licensee if the focused scope peer review had been influenced by the F&Os from the previously performed peer review. The licensee stated that the focused scope peer review was complete and independent, and had not been biased by the previous review. The NRC staff requested that the licensee's RAI response include an explanation for any HLRs that had not been evaluated as part of the focused scope peer review.

The NRC staff stated that, following the meeting, a determination would be made whether or not to continue with the denial of the LAR. No regulatory decisions were made during the meeting.

Public Participation

Members of the public were in attendance via telephone, but had no comments. Public Meeting Feedback forms were not received.

Please direct any inquiries to me at 301-415-2846, or Allison.Dietrich@nrc.gov.

Sincerely,

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 Presentation

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LIST OF ATTENDEES

OCTOBER 27, 2016, PUBLIC MEETING WITH I&M, LLC

REGARDING LICENSE AMENDMENT REQUEST

TO RELOCATE SURVEILLANCE FREQUENCIES TO LICENSEE CONTROL

DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2

CAC NOS. MF7114 AND MF7115

Name	**Organization**
Eric Benner	U.S. Nuclear Regulatory Commission (NRC)
David Wrona	NRC
Allison Dietrich	NRC
CJ Fong	NRC
Jonathan Evans	NRC
Leslie Fields	NRC
Mihaela Biro	NRC
John Ellegood*	NRC
Garill Coles*	Pacific Northwest National Laboratory (PNNL)
Steve Short*	PNNL
Michael Scarpello	Indiana Michigan Power Company (I&M)
James Heyeck	I&M
Helen Kish*	I&M
Danielle Burgoyne*	I&M
Brandon Irvin	Jensen Hughes
Eric Thornsbury	Jensen Hughes
Victoria Anderson*	Nuclear Energy Institute

*Participated by phone

Enclosure 2

Licensee Presentation

An Overview of the D.C. Cook Focused Scope Peer Review – HRA Pre-Initiators

October 27, 2016
NRC Headquarters – Rockville, MD

Presented by
Brandon Irvin – D.C. Cook PRA Team
Eric Thornsbury – D.C. Cook PRA Team
Michael Scarpello – D.C. Cook Regulatory Affairs Manager
James Heyeck – D.C. Cook PRA Engineer

TSTF-425 License Amendment Request

- A License Amendment request submitted in late 2015 for adoption of Risk Informed Initiative 5b/ TSTF-425
- RAIs received related to Pre-Initiators
  - RAI-PRA-1 – Noted F&Os received on pre-initiators from 2015 PRA Peer Review and questioned the intent to disposition these F&Os with PRA Sensitivities
  - RAI-PRA-1-01 – Focus of RAI shifted to understanding if the "new analysis" was considered as a "PRA Upgrade"

Focused Scope Follow-On Peer Review

- A review of NEI 05-04 and guidance provided directly from the PRA Standard RA-Sa-2009 was performed to determine the appropriate scope and level of review required.
  - As a result, the scope of the review was limited to Cook Pre-Initiator Methods against HLRs HR-A, HR-B and HR-C
  - SRs HR-A1 through HR-C3 reviewed

Focused Scope Follow-On Peer Review

- A Focused Scope Peer Review was performed and completed in October 2016 based on the identification of an upgrade.
  - Changes made to Identification, Screening, and Definition methodology used in PRA for pre-initiators.
  - No change made to the method of quantification or documentation.

High Level Requirement Overview

High Level Requirement (HLR) from RA-Sa-2009	Description of HLR	Disposition	Status or Result of Focused Scope Peer Review
HLR-HR-A	Identification of Pre-Initiators	Upgraded – Required Review	Focused Scope Peer Review Complete – SRs Met at CC-II
HLR-HR-B	Screening of Pre-Initiators	Upgraded – Required Review	Focused Scope Peer Review Complete – SRs Met at CC-II
HLR-HR-C	Definition of Human Failure Events to Characterize the impact of Pre-Initiators	Upgraded – Required Review	Focused Scope Peer Review Complete – SRs Met at CC-II
HLR-HR-D	Assessment and Quantification of Pre-Initiators	Not Upgraded (1)	N/A
HLR-HR-I	Documentation	Not Upgraded (2)	N/A

(1) Pre-initiator quantification methodologies (THERP and ASEP) were not changed
(2) No changes made to the documentation approach as a result of changing identification and screening

Finalizing the RAI Responses

- Pre-Initiator Focused Scope PRA Peer Review was completed and final documentation approved on October 11th 2016.
- Final RAI responses agreed to be provided by mid November can be provided as early as November 4th.

What will we provide

- A copy of the complete Focused Scope PRA Peer Review report
- Dispositioning of a finding received
  - Single Finding received related to documentation and verification of process used for screening however the SR was graded as Met Cat II

Public Participation

Members of the public were in attendance via telephone, but had no comments. Public Meeting Feedback forms were not received.

Please direct any inquiries to me at 301-415-2846, or Allison.Dietrich@nrc.gov.

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

Enclosure:
1. List of Attendees
2. Licensee Presentation

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JEvans, NRR

ADAMS Accession No.: ML16308A113

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NAME	ADietrich	SRohrer	SRosenberg	DWrona	ADietrich
DATE	11/3/16	11/3/16	11/14/16	11/15/16	11/16/16

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