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Indiana Michigan Power
Cook Nuclear Plant
One Cook Place
Bridgman, MI 49106
IndianaMichiganPower.com

May 4, 2018

AEP-NRC-2018-39
10 CFR 50.90

Docket Nos.: 50-315
50-316

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

Donald C. Cook Nuclear Plant Units 1 and 2
Supplement to Request for Deviation from
National Fire Protection (NFPA) Standard 805 Requirements

References:

1. Letter from Q. S. Lies, Indiana Michigan Power Company, to Nuclear Regulatory Commission Document Control Desk, "Donald C. Cook Nuclear Plant, Units 1 and 2, Request for Deviation from National Fire Protection Association (NFPA) 805 Requirements," dated November 7, 2017, Agencywide Documents Access and Management System Accession Number ML17317A472.

By Reference 1, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant Units 1 and 2, proposed to amend Renewed Facility Operating Licenses (RFOL) DPR-58 and DPR-74, to modify the fire protection license condition to allow for currently installed non-plenum listed cables routed above ceilings and the use of thin wall electrical metallic tubing and embedded/buried plastic conduit.

As a result of discussion between I&M and the Nuclear Regulatory Commission, it was determined that a supplement to Reference 1 should be submitted to provide revised RFOL pages to include the addition of Reference 1 submittal date. This supplement is administrative in nature and does not affect the technical evaluation as discussed in Section 3.0 of Reference 1.

Enclosure 1 to this letter provides an affirmation statement pertaining to the information contained herein.


In Enclosure 2 to this letter, I&M is providing a revision to the proposed RFOL pages as submitted in Enclosure 3 to Reference 1. This Enclosure 2 supersedes in its entirety the Enclosure 3 that was submitted in Reference 1.

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In Enclosure 3 to this letter, I&M is providing a revision to the proposed RFOI pages as submitted in Enclosure 4 to Reference 1. This Enclosure 3 supersedes in its entirety the Enclosure 4 that was submitted in Reference 1.

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

Sincerely,



Q. Shane Lies
Site Vice President

BMC/ml

Enclosures:

1. Affirmation
2. Donald C. Cook Nuclear Plant Unit 1 License Condition Pages Marked to Show Proposed Changes
3. Donald C. Cook Nuclear Plant Unit 2 License Condition Pages Marked to Show Proposed Changes

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

Enclosure 1 to AEP-NRC-2018-39

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.

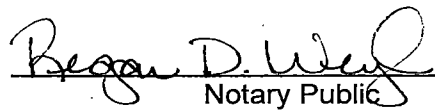
Indiana Michigan Power Company



Q. Shane Lies
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 4 DAY OF May 2018



Notary Public

My Commission Expires 01/28/2025



Enclosure 2 to AEP-NRC-2018-39

**Donald C. Cook Nuclear Plant Unit 1 License Condition Pages Marked
to Show Proposed Changes**

May 1, 2013, June 21, 2013, and September 16, 2013; and the license amendment request dated November 7, 2017, as supplemented by letter dated May 4, 2018, and as approved in the Safety Evaluation[s] dated October 24, 2013 and XXXXX, 2018]. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(a) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed Fire PRA (FPRA) model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

1. Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.
2. Prior NRC review and approval is not required for individual changes that result in a risk increase less than 1×10^{-7} /year (yr) for CDF and less than 1×10^{-8} /yr for LERF. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

(b) Other Changes that May Be Made Without Prior NRC Approval

1. Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program and Design Elements

Prior NRC review and approval are not required for changes to the NFPA 805, Chapter 3, fundamental fire protection program elements and design requirements for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is functionally equivalent or adequate for the hazard. The licensee may use an engineering evaluation to demonstrate that a change to an NFPA 805, Chapter 3, element is functionally equivalent to the corresponding technical requirement. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component,

Enclosure 3 to AEP-NRC-2018-39

**Donald C. Cook Nuclear Plant Unit 2 License Condition Pages Marked
to Show Proposed Changes**

residual heat removal, safety injection and boron injection systems in accordance with the specifications of Section XI of the American Society of Mechanical Engineers Code. In addition, prior to completion of the first inservice testing interval, test connections which allow individual leak testing of the charging pump system discharge check valves shall be installed and the check valves shall be leak tested. The tests shall be repeated at the conclusion of each subsequent inservice inspection interval.

- (d) Deleted by Amendment No. 39
- (e) Deleted by Amendment No. 5
- (f) Deleted by Amendment No. 2
- (g) Deleted by Amendment No. 60
- (h) Deleted by Amendment No. 63
- (i) Deleted by Amendment No. 19
- (j) Power Operation with Fewer than Four Reactor Coolant Pumps in Operation

Indiana Michigan Power Company shall not operate the reactor at power levels above P-7 (as defined in Table 3.3.1-1 of Specification 3.3.1 of Appendix A to this renewed operating license) with fewer than four reactor coolant loops in operation until safety analyses for fewer than four loop operation have been submitted and approval for fewer than four loop operation at power levels above P-7 has been granted by the Commission by Amendment of this license.

- (k) Deleted by Amendment No. 16
- (l) Deleted by Amendment No. 63
- (m) Deleted by Amendment No. 19
- (n) Deleted by Amendment No. 28
- (o) Fire Protection Program

Indiana Michigan Power Company shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee's amendment request dated July 1, 2011, as supplemented by letters dated September 2, 2011, April 27, 2012, June 29, 2012, August 9, 2012, October 15, 2012, November 9, 2012, January 14, 2013, February 1, 2013, May 1, 2013, June 21, 2013, and September 16, 2013; and the license amendment request dated November 7, 2017, as supplemented by letter dated May 4, 2018, and as approved in the Safety Evaluation[s] dated October 24, 2013 and XXXXX, 2018. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would