



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

June 6, 2019

LICENSEE: Indiana Michigan Power Company, LLC

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

SUBJECT: SUMMARY OF MAY 14, 2019, MEETING WITH INDIANA MICHIGAN POWER COMPANY REGARDING DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2 (EPID L-2019-LRM-0023)

On May 14, 2019, a Category I public teleconference was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Indiana Michigan Power Company (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 for Donald C. Cook Nuclear Plant (CNP), Units Nos. 1 and 2. The licensee plans to submit an amendment to revise the technical specification (TS) requirements related to diesel generator (DG) testing using resistor banks. The meeting notice and agenda, dated March 21, 2018, is available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML19121A072. A list of attendees is provided as Enclosure 1. The licensee's presentation is provided in Enclosure 2.

The licensee discussed the planned license amendment to remove TS surveillance requirements (SRs) to connect the DG to resistor bank loads. The licensee indicated that the resistor banks are not safety-related, they have not used the banks since the 1990s, and removal of the banks from the facility is desired so that other equipment can be installed where the banks are located. The affected TS SRs are 3.8.1.20, 3.8.1.23, and 3.8.2.1.

The NRC staff questioned the licensee as to whether there are any safety-related components affected by the change. The licensee indicated that the change will impact safety-related breakers and cables that connect the resistor banks to the DG, and the amendment request would include a discussion of potential impact on safety-related equipment. The NRC staff questioned if the equipment to be placed in the vacated resistor bank location would be connected to the DGs. The licensee indicated that any new equipment would not be connected to the DGs or other safety-related equipment. The NRC staff questioned the licensee on the licensing history and why the TSs included the requirements that they planned to delete. The licensee indicated that the amendment would describe licensing history and why the requirement existed and why it is no longer needed.

No members of the public participated in the meeting.

Please direct any inquiries to me at 301-415-3733, or Robert.Kuntz@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'R. Kuntz', written over a horizontal line.

Robert F. Kuntz, Senior Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosure: List of Attendees

cc: Listserv

LIST OF ATTENDEES

MAY 14, 2019, PUBLIC MEETING WITH INDIANA AND MICHIGAN (I&M)

DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2

PLANNED LICENSE AMENDMENT REQUEST

REGARDING DIESEL GENERATOR LOAD TEST BANKS

Name	Organization
Robert Kuntz	Nuclear Regulatory Commission (NRC)
Donna Williams	NRC
Adakou Foli	NRC
Vijay Goel	NRC
Helen Levendosky	Indiana Michigan Power Company (I&M)
Joseph Waters	I&M
Kirk Newel	I&M
David Pedersen	I&M
Eddie Hoskins	I&M
Jerry Dowdy	I&M
Peter Caursona	Sargent and Lundy (licensee contractor)
Nehal Shah	Sargent and Lundy (licensee contractor)
Jasmine Robinson	Sargent and Lundy (licensee contractor)

Background

- The D.C. Cook design currently includes nonsafety-related resistor banks originally intended for use in deisæl generator (DG) testing.
- The resistor banks are located on the Auxiliary Building roof and are provided with a safety-related breaker to connect the safety related DG output cabling to the nonsafety-related resistor bank cabling.
- Resistor bank components have become degraded and are no longer functional.
- I&M now uses grid loads and plant engineered safety feature (ESF) loads for DG testing and governor tuning.
- The grid loads and ESF loads are connected to the generator output by the two safety-related breakers that connect the DG output the 4 kV (kilovolt) Safety buses.
- I&M plans to remove the resistor banks to allow placement of other nonsafety-related equipment in the vacated resistor bank location.
- There are two D.C. Cook technical specification (TS) surveillance requirements (SRs) that ensure DG availability under accident conditions will not be compromised when the DG is operating in test mode, depending on which “test mode” is being used:

- D.C. Cook TS SR 3.8.1.20 states (emphasis added):

“Verify, with a DG operating in test mode and connected to its load test resistor bank, an actual or simulated ESF actuation signal overrides the test mode by:

- a. Returning DG to ready-to-load operation; and
- b. Verifying the emergency loads are serviced by offsite power”

This D.C. Cook-specific SR ensures that the DG availability will not be compromised as the result of testing that involves connecting the DG to its test load resistor bank.

- D.C. Cook TS SR 3.8.1.21 states (emphasis added):

“Verify, with a DG operating in test mode and connected to its bus, an actual or simulated ESF actuation signal overrides the test mode by:

- a. Returning DG to ready-to-load operation; and
- b. Verifying the emergency loads are serviced by offsite power.”

This standard SR ensures that the DG availability will not be compromised as the result of testing that involves connecting the DG to its bus, i.e. the 4 kV Safety buses that are now used to connect grid loads or plant ESF loads to the DG output for generator testing and governor tuning.

Planned License Amendment Request (LAR)

- I&M plans to submit an LAR to delete SR 3.8.1.20 to recognize that the resistor banks will no longer exist.
- Existing SR 3.8.1.21 will be unaffected.
- Conforming editorial changes will be included to delete reference to SR 3.8.1.20 from two other DG SRs (SR 3.8.1.23 and SR 3.8.2.1).
- Copies of supporting TS Bases changes will be included in the LAR for information only.
- The LAR technical basis will describe:

The manner in which DG testing and governor tuning is now performed using grid loads and plant ESF loads via the 4 kV Safety buses rather than resistor bank loads.

How assurance of DG availability during current testing and governor tuning is provided by existing SR 3.8.1.21.

The final configuration of the safety-related components affected by the plant modification to remove the resistor banks.

- The regulatory basis will describe:

How compliance with 10 CFR 50.36(c)(3), "Surveillance Requirements," will be maintained.

How compliance with the D.C. Cook Plant Specific Design Criteria (PSDC) 38, "Reliability and Testability of Engineered Safety Features," and PSDC and 39, "Emergency Power," will be maintained.

How conformance with NUREG 1431, "Standard Technical Specifications - Westinghouse Plants," will be maintained.

The determination of no significant hazards considerations based on the standards set forth in 10 CFR 50.92(c).

The determination that no environmental impact statement or environmental assessment is required pursuant to 10 CFR 51.22(b).

Schedule

- LAR submittal is planned for mid-2019.
- NRC approval by mid-2020 will be requested.

SUBJECT: SUMMARY OF NOVEMBER 19, 2018, MEETING WITH INDIANA MICHIGAN POWER COMPANY REGARDING DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2 (EPID L-2019-LRM-0023) DATED JUNE 6, 2019

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ADAMS Accession No. ML19141A062

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DATE	05/21/19	05/21/19	06/05/19	06/06/19

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