

A unit of American Electric Power

Indiana Michigan Power Cook Nuclear Plant One Cook Place

Bridgman, MI 49106 IndianaMichiganPower.com

September 1, 2020

AEP-NRC-2020-60 10 CFR 50.55a

Docket Nos.: 50-315

50-316

U. S. Nuclear Regulatory Commission

ATTN: Document Control Desk Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Unit 1 and Unit 2

Request to Use a Provision of a Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI

#### References:

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and the guidance provided in the referenced document, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2, requests Nuclear Regulatory Commission (NRC) approval to use a specific provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for CNP Unit 1 and Unit 2. Specifically, I&M requests approval to use IWA-4540(b) of the 2017 Edition of the ASME B&PV Code. The enclosure to this letter provides details of the proposed change.

I&M requests approval of this request by September 19, 2020. There are no regulatory commitments in this letter.

If you have any questions concerning this letter, please contact Mr. Michael K. Scarpello, Regulatory Affairs Director, at (269) 466-2649.

Sincerely,

Q. Shane Lies Site Vice President

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MBE/mll

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Enclosure: Proposed Use of Subsequent ASME Code Edition and Addenda in Accordance with 10

CFR 50.55a(g)(4)(iv)

c: R. J. Ancona – MPSC

EGLE - RMD/RPS

J. B. Geissner - NRC Region III

NRC Resident Inspector

S. P. Wall – NRC Washington, D.C.

A. J. Williamson - AEP Ft. Wayne, w/o enclosures

#### **Enclosure to AEP-NRC-2020-60**

## Proposed Use of Subsequent ASME Code Edition and Addenda in Accordance with 10 CFR 50.55a(g)(4)(iv)

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv) and the guidance provided in Reference 1, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2, requests Nuclear Regulatory Commission (NRC) approval to use specific provisions of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for CNP Unit 1 and Unit 2. Specifically, I&M requests approval to use IWA-4540(b) of the 2017 Edition of the ASME B&PV Code.

#### 1. ASME Code Component(s) Affected:

All Class 1, 2, and 3 items located in the ASME Section XI boundaries.

#### 2. Requested Date for Approval:

Approval requested by September 19, 2020

## 3. Applicable Code Edition and Addenda:

PLANT	<u>ISI</u> INTERVAL	EDITION	INTERVAL START	INTERVAL SCHEDULED END
Donald C. Cook Nuclear Plant, Unit 1 and Unit 2	5	2013 Edition	03/01/2020	02/28/2030

## 4. Proposed Subsequent Code Edition and Addenda (or Portion):

I&M performs Repair/Replacement activities in accordance with the Donald C. Cook Nuclear Plant Unit 1 and Unit 2 ISI Program Inspection Plan Fifth Ten-Year Inspection Interval. This program plan is based on an Edition of ASME Section XI which, at present, is the 2013 Edition.

Pursuant to 10 CFR 50.55a(g)(4)(iv), I&M requests permission to utilize IWA-4540(b) from the 2017 Edition. This subparagraph outlines items that are exempt from pressure testing after repair/replacement activities.

#### 5. Related Requirements:

10 CFR 50.55a(g)(4)(iv) states:

"Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (a) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used, provided that all related requirements of the respective editions or addenda are met."

10 CFR 50.55a(b)(2) incorporates by reference Section XI, Division 1, of the ASME B&PV Code 2017 Edition as approved in Reference 3. I&M is requesting to use of IWA-4540(b) of the 2017 Edition of ASME Section XI to utilize the exemptions listed. There are no related requirements or applicable conditions associated with this subparagraph, IWA-4540(b).

## 6. <u>Duration of Proposed Request:</u>

The duration of this request will continue for the remainder of the site's current Inservice Inspection interval.

## 7. References:

- 1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004.
- 2. U. S. Nuclear Regulatory Commission Memorandum from D. Rudland (Senior Level Advisor, Division of New and Renewed Licenses) to Anna H. Bradford (Director, Division of New and Renewed Licenses), "Summary of the June 25, 2020, Public Meeting with the Nuclear Industry to Discuss Title 10 of the Code of Federal Regulations Section 50.55a(b)(2)(xxvi) Condition on the Pressure Testing of Class 1, 2, and 3 Mechanical Joints," dated July 8, 2020 (ML20189A286)
- 3. Federal Register, 85 FR 26540, dated May 4, 2020

#### 8. Precedents

No precedents have been identified.