

From: Wall, Scott
Sent: Tuesday, January 26, 2021 3:48 PM
To: Michael K. Scarpello
Cc: Helen L Levendosky; Joe Tanko
Subject: Final RAI - D.C. Cook 1 & 2 - Relief Request REL-PP2 for Pump and Valve IST Fifth 10-year interval (EPID No. L-2020-LLR-0138)

Dear Mr. Scarpello,

By letter dated October 5, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20290A500), Indiana Michigan Power Company (I&M, the licensee) requested that, pursuant to Section 50.55a(z)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR), the Nuclear Regulatory Commission (NRC) authorize relief request REL-PP2 for Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2 (CNP). Specifically, the licensee requested authorization of a proposed alternative to certain requirements in the American Society of Mechanical Engineers Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code), associated with the vibration acceptance criteria for smooth running pumps at CNP.

The NRC staff has reviewed the submittals and determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). During a telephone call on January 26, 2021, the I&M staff indicated that a response to the RAIs would be provided by February 26, 2021.

If you have questions, please contact me at 301-415-2855 or via e-mail at Scott.Wall@nrc.gov.

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Docket Nos. 50-315 and 50-316

Enclosure:
Request for Additional Information

cc: Listserv

RAI-EMIB (REL-PP2)

REQUEST FOR ADDITIONAL INFORMATION

PROPOSED ALTERNATIVE TO AMERICAN SOCIETY OF MECHANICAL ENGINEERS

BOILER AND PRESSURE VESSEL CODE

RELIEF REQUEST REL-PP2

INDIANA MICHIGAN POWER COMPANY

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

DOCKET NOS. 50-315 AND 50-316

INTRODUCTION

By letter dated October 5, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20290A500), Indiana Michigan Power Company (I&M, the licensee) requested that, pursuant to Section 50.55a(z)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR), the Nuclear Regulatory Commission (NRC) authorize relief request REL-PP2 for Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2 (CNP). Specifically, the licensee requested authorization of a proposed alternative to certain requirements in the American Society of Mechanical Engineers Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code), associated with the vibration acceptance criteria for smooth running pumps at CNP.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the application and has determined that the following additional information is required in order to complete the review.

APPLICABLE REGULATION AND GUIDANCE

The NRC regulations in 10 CFR 50.55a(z)(1) require that a licensee must demonstrate that its proposed alternative would provide an acceptable level of quality and safety.

The NRC regulations in 10 CFR 50.55a(f)(4), "Inservice testing standards requirement for operating plants," states, in part, that valves that are within the scope of the ASME OM Code must meet the inservice testing (IST) requirements set forth in the ASME OM Code; and that valves that are within the scope of the ASME OM Code, but are not classified as ASME BPV Code Class 1, 2, or 3, may be satisfied as part of an augmented IST program.

RAI-EMIB-01

The NRC staff compared the October 5, 2020, submittal to the version of the CNP IST Program Plan outlined in letter dated June 30, 2016 (ADAMS Accession No. ML16197A057) and noted apparent differences. Please confirm the information for the components within scope of the IST Program with respect to the differences noted in the table below:

Pump	Submittal Information	IST Plan Information
1-PP-3E 1-PP-3W	Code Class 2	Code Class 3
1-PP-7E 1-PP-7W	Centrifugal	Vertical Line Shaft (VLS)
1-PP-9E 1-PP-9W	Code Class 3, OM Group A	Code Class 2, OM Group B
1-QT-106-AB1 1-QT-106-AB2 1-QT-106-CD1 1-QT-106-CD2	Non Class, OM Group B, Positive Displacement Pump	Not in IST Plan Table

1-QT-130-AB1 1-QT-130-AB2 1-QT-130-CD1 1-QT-130-CD2	Non Class, OM Group A, Centrifugal	Augmented Group B
2-PP-3E 2-PP-3W	Code Class 2	Code Class 3
2-PP-7E 2-PP-7W	Centrifugal	VLS
2-PP-9E 2-PP-9W	Code Class 3, OM Group A	Code Class 2, OM Group B
2-QT-106-AB1 2-QT-106-AB2 2-QT-106-CD1 2-QT-106-CD2	Non Class, OM Group B, Positive Displacement Pump	Not in IST Plan Table
2-QT-130-AB1 2-QT-130-AB2 2-QT-130-CD1 2-QT-130-CD2	Non Class, OM Group A, Centrifugal	Not in IST Plan Table

EMIB REVIEW NOTE

ASME prepares Code Cases to provide alternative methods to satisfy certain requirements of the ASME OM Code. Recently, ASME issued Code Case OMN-22, "Smooth Running Pumps," to provide its recommended method for an alternative to the ASME OM Code pump testing requirements for smooth running pumps. The wording in the licensee's alternative request looks similar to OMN-22, but this Code Case is not directly referenced in the alternative request. Does the similarity in wording reflect the licensee's intention to follow OMN-22?

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