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August 28, 2024

AEP-NRC-2024-76
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 Unit 1 and Unit 2
Supplement to License Amendment Request for One-Time Extension of Completion Time for
Inoperable AC Source - Operating

References:

1. Letter from K. J. Ferneau, Indiana Michigan Power Company (I&M), to U.S. Nuclear Regulatory Commission (NRC), "Donald C. Cook Nuclear Plant Unit 1 and Unit 2 License Amendment Request for One-Time Extension of Completion Time for Inoperable AC Source - Operating," dated April 3, 2024, Agencywide Documents Access and Management System (ADAMS) Accession No. ML24094A288.
2. Letter from S. P. Wall, NRC, to Q. S. Lies, I&M, "Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2 – Supplemental Information Needed for Acceptance of License Amendment Request to Revise Technical Specification 3.8.1 (EPID No. L-2024-LLA-0040)," dated May 7, 2024, ADAMS Accession No. ML24115A215.
3. Letter from K. J. Ferneau, Indiana Michigan Power Company (I&M), to U.S. Nuclear Regulatory Commission (NRC), "Donald C. Cook Nuclear Plant Unit 1 and Unit 2 Supplement to License Amendment Request for One-Time Extension of Completion Time for Inoperable AC Source - Operating," dated May 16, 2024, ADAMS Accession No. ML24137A221.

This letter provides Indiana Michigan Power Company's (I&M), licensee for Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2, supplement to Reference 1 and Reference 3.

Enclosure 1 to this letter provides an affirmation statement. Enclosure 2 to this letter provides I&M's supplement, as discussed with the NRC staff on August 26, 2024, to Reference 1 and Reference 3.

Enclosure 3 and Enclosure 4 provide Unit 1 and Unit 2 Technical Specification (TS) pages, respectively, marked to show the proposed changes.

The changes proposed in this letter do not impact the conclusions provided in Reference 1 that a finding of "no significant hazards consideration" is justified. 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
Chief Nuclear Officer

JMT/sjh

Enclosures:

1. Affirmation
2. Supplement to License Amendment Request Regarding One-Time Extension of Completion Time for Inoperable AC Source - Operating
3. Donald C. Cook Nuclear Plant Unit 1 Technical Specification Pages Marked to Show Proposed Changes
4. Donald C. Cook Nuclear Plant Unit 2 Technical Specification Pages Marked to Show Proposed Changes

c: EGLE – RMD/RPS
J. B. Giessner – NRC Region III
NRC Resident Inspector
N. Quilico – MPSC
R. M. Sistevaris – AEP Ft. Wayne, w/o enclosures
S. P. Wall – NRC Washington, D.C.
A. J. Williamson – AEP Ft. Wayne, w/o enclosures

Enclosure 1 to AEP-NRC-2024-76

AFFIRMATION

I, Q. Shane Lies, being duly sworn, state that I am the Chief Nuclear Officer 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.

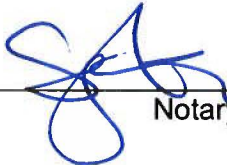
Indiana Michigan Power Company



Q. Shane Lies
Chief Nuclear Officer

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 28th DAY OF August 2024



Notary Public

My Commission Expires 5/23/2030

Enclosure 2 to AEP-NRC-2024-76

Supplement to License Amendment Request Regarding One-Time Extension of Completion Time for Inoperable AC Source - Operating

By letter dated April 3, 2024 (Reference 1), Indiana Michigan Power Company (I&M, the licensee) submitted a license amendment request (LAR) for the Donald C. Cook Nuclear Plant (CNP), Units 1 and 2. The proposed LAR would revise Technical Specification (TS) 3.8.1, "AC Sources – Operating," by adding a footnote for TS 3.8.1, Required Action A.3 to allow a one-time completion time (CT) extension from 72 hours to 288 hours to support the replacement of the 12AB (Train B) Loop Feed Enclosure (LFE) and associated bus for the Train B reserve feed preferred power source.

By letter dated May 7, 2024 (Reference 2), the U. S. Nuclear Regulatory Commission (NRC) informed I&M that the proposed LAR (Reference 1) would need to be supplemented, to be accepted, to address several items relating to NRC Branch Technical Position 8-8 that were not found in the LAR. By letter dated May 16, 2024 (Reference 3), I&M provided a supplement to Reference 1 that would address Reference 2.

This Enclosure 2 to this letter contains a supplement to Reference 1 and Reference 3 to address a single item that was discovered by I&M personnel during their review of Reference 1 and Reference 3 in preparation of implementation.

In Section "2.4 Description of the Proposed Change" in Reference 1, I&M provided a proposed footnote.

Original Footnote stated in Section 2.4, Enclosure 3 and Enclosure 4 of Reference 1:

(a) For Train B only, the Completion Time that Train B can be inoperable as specified by Required Action A.3 may be extended beyond the "72 hours" up to "288 hours," to support modification of the Train B Reserve Feed 12AB Loop Feed Enclosure. Upon completion of the modification and restoration this footnote is no longer applicable. Compensatory measures described within CNP letter AEP-NRC-2024-02, dated April 3, 2024 will remain in effect during the extended period. The one-time extension shall expire upon completion of the modification and restoration of operability for Train B.

Based on the NRC's request in Reference 2, the original footnote in Reference 1 was replaced in its entirety with the revised footnote below.

Revised Footnote stated in Reference 3:

(a) For Train B only, the Completion Time that Train B can be inoperable as specified by Required Action A.3 may be extended beyond the "72 hours" up to "288 hours," to support modification of the Train B Reserve Feed 12AB Loop Feed Enclosure. Upon completion of the modification and restoration this footnote is no longer applicable. Prior to entry into the 288-hour extended Completion Time, the Supplemental Diesel Generators (SDGs) shall be verified as available. During the 288-hour extended Completion Time, the SDGs shall be verified as available once per shift. If the SDGs becomes unavailable after the initial 72 hours while in the extended 288-hour Completion Time period, it shall be made available within 24 hours, or the unit shall be brought to MODE 3 within the next 6 hours and MODE 4 within the following 30 hours. This 24-hour period will be allowed only once within the single extended Completion Time. Compensatory measures described within CNP letter AEP-NRC-2024-02, dated April 3, 2024, and supplemented by AEP-NRC-2024-40, dated May 16th, will remain in effect during the extended period. The one-time extension shall expire upon completion of the modification and restoration of operability for Train B.

As stated in Section 2.2 “Current Technical Specification Requirements” of Reference 1, the current CNP TS state:

“2.2 Current Technical Specification requirements

CNP Unit 1 and Unit 2 TS 3.8.1, “AC Sources – Operating,” requires two qualified offsite circuits and separate and independent Diesel Generators (DGs) for each train to ensure availability of the required power to shut down the reactor and maintain it in a safe shutdown condition after an anticipated operational transient or a postulated design basis accident (DBA) in Modes 1, 2, 3, and 4. When one offsite circuit is inoperable, Condition A is entered with a Required Action to restore the train to operable status with a Completion Time of 72 hours. If Condition A and its associated Completion Time are not met, then entry into Condition G is required. Condition G requires the action to place the unit (applicable to Unit 1 and Unit 2) in Mode 3 within 6 hours and Mode 5 within 36 hours. I&M is requesting a one-time-use extension of the TS 3.8.1, Condition A.3, Completion Time from 72 hours to 288 hours (12 days) that would allow continued plant operation for only the additional time needed to modify the bus structure and restore the inoperable Train B reserve feed to Operable status.”

G. Required Action and associated Completion Time of Condition A, C, D, E, or F not met. OR Required Action and Associated Completion Time of Required Action B.2, B.3, B.4.1, B.4.2, or B.5 not met.	G.1	Be in MODE 3.	6 hours
	AND		
	G.2	Be in MODE 5.	36 hours

During I&M’s review of Reference 1 and Reference 3 an inconsistency was identified between the footnote provided in Reference 3 and the current TS 3.8.1 Condition G. The footnote stated: “If the SDGs becomes unavailable after the initial 72 hours while in the extended 288-hour Completion Time period, it shall be made available within 24 hours, or the unit shall be brought to MODE 3 within the next 6 hours and MODE 4 within the following 30 hours.” This statement is in contradiction to CNP Unit 1 and Unit 2 TS, above, in that the footnote requires placing the unit in Mode 4 within 36 hours while the current CNP Unit 1 and Unit 2 TS would require placing the unit in Mode 5 within 36 hours.

This footnote was included in the Unit 1 and Unit 2 Technical Specification marked up page, Enclosures 3 and 4, respectively, of Reference 1 and Reference 3. These Enclosures 3 and 4 of Reference 1 and Reference 3 are being replaced in their entirety by Enclosures 3 and 4 of this letter.

Revised footnote:

(a) For Train B only, the Completion Time that Train B can be inoperable as specified by Required Action A.3 may be extended beyond the "72 hours" up to "288 hours," to support modification of the Train B Reserve Feed 12AB Loop Feed Enclosure. Upon completion of the modification and restoration this footnote is no longer applicable. Prior to entry into the 288-hour extended Completion Time, the Supplemental Diesel Generators (SDGs) shall be verified as available. During the 288-hour extended Completion Time, the SDGs shall be verified as available once per shift. If the SDGs becomes unavailable after the initial 72 hours while in the extended 288-hour Completion Time period, it shall be made available within 24 hours, or the unit shall be in MODE 3 within 6 hours and be in MODE 5 within 36 hours. This 24-hour period will be allowed only once within the single extended Completion Time. Compensatory measures described within CNP letter AEP-NRC-2024-02, dated April 3, 2024, and supplemented by AEP-NRC-2024-40, dated May 16, 2024, will remain in effect during the extended period. The one-time extension shall expire upon completion of the modification and restoration of operability for Train B.

References:

1. Letter from K. J. Ferneau, Indiana Michigan Power Company (I&M), to U.S. Nuclear Regulatory Commission (NRC), "Donald C. Cook Nuclear Plant Unit 1 and Unit 2 License Amendment Request for One-Time Extension of Completion Time for Inoperable AC Source - Operating," dated April 3, 2024, Agencywide Documents Access and Management System (ADAMS) Accession No. ML24094A288.
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3. Letter from K. J. Ferneau, I&M, to NRC, "Donald C. Cook Nuclear Plant Unit 1 and Unit 2 Supplement to License Amendment Request for One-Time Extension of Completion Time for Inoperable AC Source - Operating," dated May 16, 2024, ADAMS Accession No. ML24137A221.

Enclosure 3 to AEP-NRC-2024-76

**Donald C. Cook Nuclear Plant Unit 1 Technical Specification Pages
Marked to Show Proposed Changes**

ACTIONS

-----NOTE-----

LCO 3.0.4.b is not applicable to DGs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One required offsite circuit inoperable.</p>	<p>A.1 -----NOTE----- Not applicable if a required Unit 2 offsite circuit is inoperable. ----- Perform SR 3.8.1.1 for required OPERABLE offsite circuit.</p>	<p>1 hour <u>AND</u> Once per 8 hours thereafter</p>
	<p><u>AND</u> A.2 Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable.</p>	<p>24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)</p>
	<p><u>AND</u> A.3 Restore required offsite circuit to OPERABLE status.</p>	<p>72 hours^(a) <u>AND</u> 17 days from discovery of failure to meet LCO 3.8.1.a or b</p>

(a) For Train B only, the Completion Time that Train B can be inoperable as specified by Required Action A.3 may be extended beyond the "72 hours" up to "288 hours," to support modification of the Train B Reserve Feed 12AB Loop Feed Enclosure. Upon completion of the modification and restoration this footnote is no longer applicable. Prior to entry into the 288-hour extended Completion Time, the Supplemental Diesel Generators (SDGs) shall be verified as available. During the 288-hour extended Completion Time, the SDGs shall be verified as available once per shift. If the SDGs becomes unavailable after the initial 72 hours while in the extended 288-hour Completion Time period, it shall be made available within 24 hours, or the unit shall be in MODE 3 within 6 hours and be in MODE 5 within 36 hours. This 24-hour period will be allowed only once within the single extended Completion Time. Compensatory measures described within CNP letter AEP-NRC-2024-02, dated April 3, 2024, and supplemented by AEP-NRC-2024-40, dated May 16, 2024, will remain in effect during the extended period. The one-time extension shall expire upon completion of the modification and restoration of operability for Train B.

Enclosure 4 to AEP-NRC-2024-76

**Donald C. Cook Nuclear Plant Unit 2 Technical Specification Pages
Marked to Show Proposed Changes**

ACTIONS

-----NOTE-----
LCO 3.0.4.b is not applicable to DGs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One required offsite circuit inoperable.</p>	<p>A.1 -----NOTE----- Not applicable if a required Unit 1 offsite circuit is inoperable. ----- Perform SR 3.8.1.1 for required OPERABLE offsite circuit.</p> <p><u>AND</u></p> <p>A.2 Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable.</p> <p><u>AND</u></p> <p>A.3 Restore required offsite circuit to OPERABLE status.</p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p> <p>24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)</p> <p>72 hours^(a)</p> <p><u>AND</u></p> <p>17 days from discovery of failure to meet LCO 3.8.1.a or b</p>

(a) For Train B only, the Completion Time that Train B can be inoperable as specified by Required Action A.3 may be extended beyond the "72 hours" up to "288 hours," to support modification of the Train B Reserve Feed 12AB Loop Feed Enclosure. Upon completion of the modification and restoration this footnote is no longer applicable. Prior to entry into the 288-hour extended Completion Time, the Supplemental Diesel Generators (SDGs) shall be verified as available. During the 288-hour extended Completion Time, the SDGs shall be verified as available once per shift. If the SDGs becomes unavailable after the initial 72 hours while in the extended 288-hour Completion Time period, it shall be made available within 24 hours, or the unit shall be in MODE 3 within 6 hours and be in MODE 5 within 36 hours. This 24-hour period will be allowed only once within the single extended Completion Time. Compensatory measures described within CNP letter AEP-NRC-2024-02, dated April 3, 2024, and supplemented by AEP-NRC-2024-40, dated May 16, 2024, will remain in effect during the extended period. The one-time extension shall expire upon completion of the modification and restoration of operability for Train B.