

April 17, 2015

AEP-NRC-2015-43
10 CFR 50.4

Docket Nos.: 50-315
50-316

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

Donald C. Cook Nuclear Plant Units 1 and 2
PUBLIC MEETING SUMMARY FOR PRE-SUBMITTAL OF TSTF-425-A, SURVEILLANCE
FREQUENCY CONTROL PROGRAM

On April 14, 2015, at 1330 hours, the Nuclear Regulatory Commission (NRC) and Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, held a public meeting by teleconference to discuss I&M's proposed schedule and strategy for submitting a License Amendment Request (LAR) regarding Technical Specification Task Force (TSTF)-425-A, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force Initiative 5b." The following details are the key discussion points as I&M understood them; please notify I&M if there are any discrepancies.

- I&M plans to submit a LAR to adopt TSTF-425-A, Revision 3, by a targeted date of July 31, 2015, with a requested NRC approval by July 31, 2016. The NRC noted that the NRC's internal one-year metric for LAR reviews is a standard that they strive to meet. However, any delays by the licensee in providing supplements or responses to requests for additional information (RAI) could impact the review schedule.
- I&M intends to model Westinghouse SHIELD Seals in the probabilistic risk assessment (PRA) that will support adoption of TSTF-425. The NRC noted that with regard to the review of industry applications for TSTF-425, the NRC has not required a license condition relative to use of the SHIELD Seals in the PRA model. However, modeling of the seals in the PRA model needs to be discussed in the LAR.
- The NRC noted that the technical basis discussed in TSTF-425 is documented in Nuclear Energy Institute (NEI)-04-10, Revision 1, and Regulatory Guide (RG) 1.200, Revision 1; however, RG 1.200, Revision 2 is used by the NRC reviewers. There are no significant changes between Revision 1 and Revision 2 relative to TSTF-425, but there are some documentation changes. One specific difference is internal event assessment. The NRC recommended that I&M perform a gap assessment of this difference and document in the LAR how I&M plans to address it relative to TSTF-425.

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- I&M is currently performing a full PRA model update and has a Full Scope Peer Review scheduled for mid-July 2015, with results available for NRC review in late August. I&M discussed submitting a LAR with technical adequacy based on the current model, and then submitting a supplement with the new information after the Full Scope Peer Review has been completed. The NRC agreed that this was acceptable as long as the supplement included I&M's assessment of the Findings and Observations, I&M's resolution, and any impact to the PRA Model.
- The NRC requested that since CNP is a National Fire Protection Association 805 plant, that I&M discuss the Fire PRA and that it may be used for frequency extensions, or in that it is a conservative Fire PRA model, I&M may choose to perform more detailed modeling, or utilize qualitative arguments, in lieu of using the Fire PRA for surveillance frequency extensions.
- The NRC discussed a few items for I&M to be aware of:
 - There is a generic RAI for external events such as fire, seismic, and flood events.
 - There is a generic RAI to ensure the implemented Surveillance Frequency Control Program is in compliance with NEI 04-10.
 - There is a generic RAI on extension of surveillance frequencies based on demand versus time based as prescribed by the methodology in NEI 04-10.
 - That the NEI 04-10 reference for NUMARC 93-01 Revision 3, has been superseded by Revision 4.

This letter contains no new or modified regulatory commitments. Should you have any questions, please contact me at (269) 466-2649.

Sincerely,



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