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50-316

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

Donald C. Cook Nuclear Plant Units 1 and 2
Commitment Schedule Change Related To GSI-191

References:

1. Letter from J. P. Gebbie, Indiana Michigan Power Company (I&M), to Nuclear Regulatory Commission (NRC), "Donald C. Cook Nuclear Plant Units 1 and 2, Path Forward for Resolution of GSI-191," dated May 15, 2013, ADAMS Accession No. ML13137A046.
2. Policy Issue from R.W. Borchardt, NRC, for The Commissioners, NRC, SECY-12-0093, "Closure Options For Generic Safety Issue - 191, Assessment Of Debris Accumulation On Pressurized-Water Reactor Sump Performance," SECY-12-0093, dated July 9, 2012, (ML121310648).
3. Memorandum from A. L. Vietti-Cook, NRC, to R. W. Borchardt, NRC, "Staff Requirements – SECY-12-0093 – Closure Options For Generic Safety Issue - 191, Assessment Of Debris Accumulation On Pressurized-Water Reactor Sump Performance," dated December 14, 2012, (ML12349A378).

Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP), Units 1 and 2, is providing notification of a change to a regulatory commitment that was documented in Reference 1. I&M has revised the completion date to perform the necessary analysis for resolution of Generic Safety Issue (GSI) – 191, "Assessment of Debris Accumulation on PWR Sump Performance."

In Reference 1, I&M submitted information related to the closure of GSI-191, which included a commitment for additional analysis to be performed by completion of the Unit 2 refueling outage in the fall of 2016. The original commitment stated:

"As described for Option 2, in Reference 6, and approved by Reference 7, I&M will perform the necessary analysis to adopt a higher in-vessel debris limit by the completion of the third Unit 2 refueling outage following January 1, 2013 (Fall 2016 for Unit 2), per the schedule expected to be established by the PWROG for resolution for CNP plant- and fuel-specific

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design. If the completion time for resolution is projected to exceed the third Unit 2 refueling outage after January 1, 2013, then I&M will communicate with the NRC to establish a new completion time that is acceptable to the NRC."

In this letter, Reference 2 is the same as Reference 6 from the commitment statement and Reference 3 is the same as Reference 7 from the commitment statement.

As described in Reference 2, Option 2 requires implementation of additional mitigative measures until resolution is completed and allows more time for licensees to resolve issues through further industry testing or use of a risk informed approach. I&M selected the deterministic approach to Option 2, referred to as Option 2a. In order to address the requirements of Option 2a, a topical report that identifies a methodology to assess the time-dependent collection of fibrous debris in the reactor vessel, WCAP-17788, "Comprehensive Analysis and Test Program for GSI-191 Closure," has been prepared by Westinghouse Electric Company and submitted to the NRC for review and approval.

In the Staff Requirements Memorandum for SECY-12-0093 (Reference 3), the Commission indicated that the staff should work with the industry regarding the resolution period for the deterministic prong of Option 2 (Option 2a), which should not start on the artificial date of January 1, 2013, but should begin after a reasonable period of time to complete the planned tests and the staff's review. Therefore, the due date of this commitment has been changed from an estimated date based on the uncertain completion time of industry activities to a date based on approval of guidance documentation and completion of the necessary analysis and testing.

Subsequent to the creation of the commitment in Reference 1, the NRC adjusted the target schedule for the completion of their review of WCAP-17788, which is the basis for the analysis required by GSI-191 closure Option 2a. This analysis cannot be performed until the approved WCAP is published. The final closure will not be complete until I&M has performed the analysis and submitted the results to the NRC.

In accordance with the commitment to communicate with the NRC, if the completion time for resolution is projected to exceed the commitment date, I&M is providing notice of revised wording of the commitment, along with a revised due date of six months after NRC approval of WCAP-17788. This change in commitment is necessary because the issuance of WCAP-17788 by the PWROG and its review by the NRC have been significantly delayed.

The revised commitment states:

"I&M will perform the necessary analysis to adopt a higher in-vessel debris limit and make the final GL 2004-02 closure submittal within approximately six months of publication of the approved version of WCAP-17788 (WCAP-17788-P-A), which incorporates the NRC Safety Evaluation (SE) of the WCAP."

This letter contains no new regulatory commitments and one revised regulatory commitment, as

described in the enclosure to this letter. Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Manager, at (269) 466-2649.

Sincerely,

A handwritten signature in black ink that reads "Q. Shane Lies". The signature is written in a cursive style with a large, stylized "Q" and "L".

Q. Shane Lies
Site Vice President

TLC/kmh

Enclosure: Donald C. Cook Nuclear Plant Revised Regulatory Commitment

c: R. J. Ancona, MPSC
A. W. Dietrich, NRC Washington DC
MDEQ- RMD/RPS
NRC Resident Inspector
C. D. Pederson, NRC Region III
A. J. Williamson - AEP Ft. Wayne, w/o enclosures

Enclosure 1 to AEP-NRC-2016-76

**Donald C. Cook Nuclear Plant
Revised Regulatory Commitment**

The following table identifies the action committed to by Indiana Michigan Power Company (I&M) in this document. Any other actions discussed in this submittal represent intended or planned actions by I&M. They are described to the U. S. Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

Commitment	Completion Date
I&M will perform the necessary analysis to adopt a higher in-vessel debris limit and make the final GL 2004-02 closure submittal within approximately six months of publication of the approved version of WCAP-17788 (WCAP-17788-P-A), which incorporates the NRC Safety Evaluation (SE) of the WCAP.	Six months after NRC approval of WCAP-17788