

Donald C. Cook Nuclear Plant
Commitment Change Summary
November 2017 – May 2019

NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY AND DEMAND
FOR INFORMATION

Commitment No: 6086

Classification: Revision

Source Document: AEP:NRC:1184D

Existing Commitment Statement:

The Special Provisions for Donald C. Cook Nuclear Plant, which are included in all contracts, have been revised to add Section 16.0 which emphasizes the requirements of 10 CFR 50.7, specifically, Employee Protection.

Revised Commitment Statement:

I&M will ensure Contracts for on-site services, issued by Cook Plant, include provisions reflecting I&M's policy against discrimination as specified in the Energy Reorganization Act, Section 211.

Change Description Summary:

To align with industry best business practices, the Employee Protection requirements have been placed directly into each vendor contract rather than included in the Special Provisions.

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CONTROL OF HEAVY LOADS

Commitment No: 6587

Classification: Revision

Source Document: AEP:NRC:0514G

Existing Commitment Statement:

[Cook Plant] will conduct a program of non-destructive examination of load bearing welds to ensure that all welds will be examined over a normal inservice inspection interval of 10 years in a manner consistent with the ASME Boiler and Pressure Vessel Codes for Class 2 Component Supports. Dimensional checking is not included in our program. Other checks on critical load path parts, such as pins, are also not included since an examination for these items would require disassembly of the special lift devices.

Revised Commitment Statement:

Cook will conduct a program of non-destructive examination of load bearing welds in a manner consistent with Industry Standards in both methodology and periodicity for Special Lifting Devices. Dimensional checking is not included in our program. Other checks on critical load parts, such as pins, are not included since examination for these items would require disassembly of the special lifting devices.

Change Description Summary:

The Commitment as it existed did not allow for improved techniques or technologies that are available and used throughout the industry. Additionally, the current configuration of the internals lift rig no longer allows for the testing as performed in the past and would now require disassembly of equipment for inspection which is contrary to the provisions as described in this Commitment.

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FINAL RESPONSE TO RAI CONCERNING THE REACTOR VESSEL INTERNAL AGING
MANAGEMENT PROGRAM

Commitment No: 8607

Classification: Due Date Change

Source Document: AEP-NRC-2014-60

Existing Commitment Statement:

I&M will continue to participate in the Pressurized Water Reactor Owners Group (PWROG) project for lower support columns. I&M will provide a supplemental response to the NRC on this request for additional information when an acceptable methodology is developed by the PWROG project.

Revised Commitment Statement:

There is no proposed revision to the commitment description. The commitment due date was changed from 12/31/2017 to 7/31/2018.

Change Description Summary:

The NRC staff will be issuing a safety evaluation on the closure of A/LAI 1 and 7 from MRP-227-A. A draft of this evaluation was issued in the 3rd quarter 2017 with a final evaluation expected during the first quarter of 2018. Therefore, the commitment due date was changed to July 31, 2018 to allow time for I&M to review the staff evaluation and reference it appropriately in the commitment closure documentation.

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COMMITMENT TO MAINTAIN SEVERE ACCIDENT MITIGATION GUIDELINES

Commitment No: 8632

Classification: Revision

Source Document: AEP-NRC-2015-117

Existing Commitment Statement:

CNP will update the SAMGs to future revisions of the PWROG generic severe accident technical guidelines, and the SAMGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents.

Revised Commitment Statement:

CNP will update the SAMGs to future revisions of the PWROGs, Generic Severe Accident Technical Guidelines.

Change Description Summary:

The original commitment contained NEI 14-01 language which was added when the original draft Beyond Design Basis rulemaking 10 CFR 50.155 included requirement to "integrate" all of the procedures together. The final rule making will no longer require integration with other emergency response guideline sets.