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Indiana Michigan Power
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March 2, 2022

AEP-NRC-2022-12
10 CFR 50.54(f)

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 Units 1 and 2
Commitment Schedule Change Related to Seismic PRA Distributed Ignition Backup Power
Source

By letter dated November 4, 2019 (ML19310D805), Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, submitted a Seismic Probabilistic Risk Assessment (SPRA), for Units 1 and 2. By letter dated July 16, 2020 (ML20206K894), I&M made a regulatory commitment to provide a backup power source to the distributed ignition system (DIS) for use in loss of offsite power scenarios. The SPRA analyses show that the backup power source provided additional large early release frequency margin. In Enclosure 2 to the July 16, 2020, letter, I&M committed to "Provide backup power to the containment distributed ignition system in the event of loss of offsite power." The completion date for the commitment is September 9, 2022. By letter dated September 23, 2020 (ML20232A894), the Nuclear Regulatory Commission (NRC) transmitted the staff's evaluation of the CNP SPRA. The staff's evaluation specifically relies on the commitment by I&M to install the DIS backup power supply.

I&M is currently implementing the DIS backup power supply modification for CNP Units 1 and 2. During installation planning, CNP Operations staff identified concerns associated with the installation work for the DIS backup power modification in the control room panels that are affected by the modifications. Modification work inside the control panels is in the vicinity of sensitive equipment which could result in a reactor trip if this work was performed with the unit at power. The potential reactor trip concerns were recently identified and CNP management has determined that the scope of work should be performed during a plant shutdown. The original schedule for I&M's commitment for the modification did not consider completing this work during the refueling outages. The work to complete the DIS modification is being rescheduled to occur during the refueling outages in the spring of 2022, for Unit 1 and the fall of 2022, for Unit 2. This change in schedule will result in a delay in completing the modification beyond the original commitment date.

This letter is to notify the NRC of I&M's change in commitment completion date that is necessary to allow for performing the remaining installation work during the refueling outages. This change will mitigate the potential reactor trip concern by completing the modification while the units are offline. The revised completion date for the DIS backup power modification is December 15, 2022. The original text of the committed action is unchanged.

Enclosure 1 to this letter provides the affirmation statement. Enclosure 2 to this letter provides the revised regulatory commitment completion date.

This letter contains no new regulatory commitment and one revised regulatory commitment. Should you have any questions, please contact Mr. Michael K. Scarpello, Director of Regulatory Affairs, at (269) 466-2649.

Sincerely,

A handwritten signature in black ink, appearing to read "Quinton A. Lies".

Q. Shane Lies
Site Vice President

DLW/ml

Enclosures:

1. Affirmation
2. Revised Commitment

c: R. J. Ancona – MPSC
EGLE – RMD/RPS
J. B. Giessner – NRC Region III
NRC Resident Inspector
R. M. Sistevaris – AEP Ft. Wayne, w/o enclosures
J. E. Walcutt – 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-2022-12 - Affirmation

AFFIRMATION

I, Q. Shane Lies, being duly sworn, state that I am the Site Vice President 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
Site Vice President

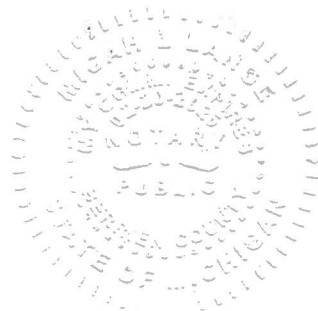
Quinton A. Lis

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 2nd DAY OF March, 2022

Micah J. Lange
Notary Public

My Commission Expires 02/20/2025



Enclosure 2 to AEP-NRC-2022-12 – Revised Commitment

The following identifies the revised completion date and restates the original action to which Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2 has committed to.

Please direct any questions regarding these commitments to Mr. Michael K. Scarpello, Director of Regulatory Affairs, at (269) 466-2649.

Commitment Description

Provide backup power to the containment distributed ignition system in the event of loss of offsite power.

Revised Completion Date

12/15/2022