



November 10, 2000

C1100-08  
10 CFR 50.90

Docket Nos.: 50-315  
50-316

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
TECHNICAL SPECIFICATION CHANGE REQUEST  
VALVE POSITION FOR AUTOMATIC VALVES IN THE  
AUXILIARY FEEDWATER SYSTEM  
(TAC NOS. MB0292 and MB0293)

- References: 1) Letter from R. P. Powers (I&M) to U.S. Nuclear Regulatory Commission (NRC) Document Control Desk, "Technical Specification Change Request Valve Position for Automatic Valves in the Auxiliary Feedwater System," submittal C1000-09, dated October 18, 2000.
- 2) Letter from U.S. NRC, to R. P. Powers "Request for Additional Information Related to Technical Specification Change Request Valve Position for Automatic Valves in the Auxiliary Feedwater System (TAC Nos. MB0292 and MB0293)," dated October 27, 2000.

In Reference 1, Indiana Michigan Power Company (I&M), the Licensee for Donald C. Cook Nuclear Plant Units 1 and 2, proposed to amend Appendix A, Technical Specifications (TS), of Facility Operating Licenses DPR-58 and DPR-74. I&M proposed to revise TS 3/4.7.1.2, "Auxiliary Feedwater System [AFW]," to change the description in a TS surveillance requirement of the position for each automatic valve in the system from the "fully open" position to the "correct" position.

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In Reference 2, the NRC provided two questions related to the requested license amendment. The I&M response to the questions is provided in Attachment 1. Attachment 2 provides two new commitments made in this letter.

I&M has reviewed the attached information, and has concluded that the evaluation of significant hazards considerations, as contained in Attachment 4 to Reference 1, is not affected.

Should you have any questions, please contact Mr. Wayne J. Kropp, Director of Regulatory Affairs, at (616) 697-5056.

Sincerely,



M. W. Rencheck  
Vice President Nuclear Engineering

Attachment

\dmb

c: J. E. Dyer  
MDEQ - DW & RPD, w/o attachment  
NRC Resident Inspector  
R. Whale, w/o attachment

**AFFIRMATION**

I, Michael W. Rencheck, being duly sworn, state that I am Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the 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



M. W. Rencheck  
Vice President Nuclear Engineering

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 10<sup>th</sup> DAY OF November, 2000

Pamela J. Schmaltz  
Notary Public

My Commission Expires \_\_\_\_\_ PAMELA J. SCHMALTZ  
Notary Public, Berrien County, MI  
My Commission Expires Oct 2, 2004

## ATTACHMENT 1 TO C1100-08

### RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

Indiana Michigan Power Company (I&M), the Licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, provides the following responses to NRC letter, "Donald C. Cook Nuclear Plant, Units 1 and 2 – Request for Additional Information (RAI) for "Technical Specification Change Request Valve Position for Automatic Valves in the Auxiliary Feedwater System," Dated October 18, 2000, (TAC Nos. MB0292 and MB0293)," dated October 27, 2000.

#### **NRC Question 1**

"For the proposed Technical Specifications (TSs) Surveillance Requirement (SR) 4.7.1.2.d change from "fully open" position to the "correct" position for each automatic valve in the auxiliary feedwater (AFW) system, what is the frequency of this SR?"

#### **I&M Response 1**

The surveillance is performed at least once every 31 days. I&M's proposed change does not affect the surveillance frequency.

In reviewing the current TS in response to the staff's question, I&M concluded that the existing reference to TS 4.0.5 (inservice inspection and testing of American Society of Mechanical Engineers [ASME] Code Class 1, 2, and 3 components) does not provide a frequency for SR 4.7.1.2.d or 4.7.1.2.c. I&M inadvertently deleted a 31 day requirement for these TS SRs in a license amendment request dated August 7, 1990. The request was subsequently issued as amendments 164 and 149 on April 22, 1992.

Although SRs 4.7.1.2.c and 4.7.1.2.d have no frequency specified in the TS, I&M's applicable surveillance procedures maintain the previous 31-day surveillance frequency. Failure to correct the missing TS surveillance frequency for SRs 4.7.1.2.c and 4.7.1.2.d has been documented in I&M's corrective action program. To address this condition, I&M is making the following commitments:

1. I&M will submit a license amendment request to restore the 31-day frequency for TS SRs 4.7.1.2.c and 4.7.1.2.d.
2. I&M will maintain administrative controls implementing the 31-day frequency for TS SRs 4.7.1.2.c and 4.7.1.2.d.

**NRC Question 2**

“With the certain automatic valves in the AFW flowpath being changed from the "fully open" to the "correct" position, will the AFW flow requirement be met for all Updated Final Safety Analysis Report (UFSAR) Chapter 14 accident analyses?”

**I&M Response 2**

The AFW system flow requirements for UFSAR Chapter 14 accident analyses will continue to be met.

The AFW system is designed to provide sufficient make-up to the steam generators when the main feedwater supply is not available under the following accident scenarios: loss of main feedwater, station blackout, rupture of main feedline and rupture of main steamline. The currently required AFW flowrates were determined for each of the above scenarios. The results of these hydraulic analyses were used as inputs in the appropriate Chapter 14 accident analyses. The current “correct” initial position of AFW system valves in the flowpath is the “fully open” position, which is based upon the UFSAR Chapter 14 safety analyses.

As previously described in I&M’s original submittal (Reference 1 of cover letter) a change from the “fully open” position for automatic AFW system valves is under consideration to resolve a steam generator overfilling concern. The I&M design change process will ensure that a change made to the “correct” automatic valve position to resolve overfill considerations, is evaluated for potential impact on the inputs to the Chapter 14 safety analyses, as required by 10 CFR 50.59. The process assures that any impact identified will be resolved including, if necessary, appropriate changes to the Chapter 14 accident analysis.

In summary, the proposed change to describe the required position of automatic AFW valves in the flowpath as the “correct” position for surveillance purposes will not result in changes to the valve position that conflict with the Chapter 14 accident analysis.

ATTACHMENT 2 TO C1100-08

COMMITMENTS

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

Commitment	Due Date
I&M will submit a license amendment request to restore the 31-day frequency for TS SRs 4.7.1.2.c and 4.7.1.2.d.	June 30, 2001.
I&M will maintain the 31-day frequency for TS SRs 4.7.1.2.c and 4.7.1.2.d.	Ongoing until the license amendment is approved and implemented.