Indiana Michigan Power Company 500 Circle Drive Buchanan, MI 49107 1395

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June 24, 2002

AEP:NRC:2609 10 CFR 50.4

Docket Nos.: 50-315 50-316

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Mail Stop O-P1-17 Washington, DC 20555-001

## Donald C. Cook Nuclear Plant Units 1 and 2 REQUEST FOR REGULATORY CONFERENCE AND ADDITIONAL INFORMATION

Reference: D. C. Cook Nuclear Power Plant, Units 1 and 2 NRC Special Inspection Report 50-315/01-17 (DRP); 50-316/01-17 (DRP); Preliminary Yellow Finding

The referenced inspection report documented a preliminary yellow finding concerning inadequate detail in maintenance instructions for essential service water pump discharge strainer basket installation. Indiana Michigan Power Company (I&M) requests a regulatory conference with the Nuclear Regulatory Commission (NRC) to present I&M's perspective on this preliminary significance conclusion by the NRC. The regulatory conference will be scheduled with Mr. David G. Passehl of NRC Region III.

To better ensure that the regulatory conference will involve a productive exchange of information, I&M requests additional details from the NRC concerning certain conclusions and assumptions made by the inspection team as documented in the referenced inspection report. I&M considers this information to be vital for a successful regulatory conference. I&M requests that the information be provided by July 9, 2002, to allow adequate time for review and assessment of its content. The attachment to this letter details I&M's request for additional information.

This letter contains no new commitments.

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Should you have any questions, please contact Mr. Gordon P. Arent, Manager of Regulatory Affairs, at (616) 697-5553.

Sincerely,

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A. C. Bakken III Senior Vice President

TW/dmb

Attachment

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

## ATTACHMENT TO AEP:NRC:2609

## **REQUEST FOR ADDITIONAL INFORMATION**

NRC Special Inspection Report 50-315/01-17 (DRP); 50-316/01-17 (DRP) documented a preliminary yellow finding concerning inadequate detail in maintenance instructions for essential service water pump discharge strainer basket installation. Indiana Michigan Power Company (I&M) requests the following additional information to prepare for a regulatory conference pertaining to the preliminary yellow finding.

I&M requests that the following be provided:

- 1) A description of the Significance Determination Process results for any other sequences determined to be greater than green by the Nuclear Regulatory Commission (NRC).
- 2) The basis for the assumption that the inrush of water expected to occur immediately after a dual unit LOOP event has sufficient energy and flow velocities to cause local eddies and vertical water velocities sufficient to entrain debris located in the previous quiescent flow areas of the intake structure. Refer to page 29 of the inspection report.
- 3) The details from recent NRC studies indicating that the conditional probability of large early release, given core damage, is approximately 0.82. Refer to page 27 of the inspection report.
- 4) The basis for using a large early release frequency value of 0.4, since the value appears to exceed the maximum conditional probability value provided in NUREG/CR-6595, "An Approach for Estimating the Frequencies of Various Containment Failure Modes and Bypass Events," dated January 1999. Refer to page 27 of the inspection report.
- 5) The basis for and method used to combine the individual block evaluations into a "D/G common cause failure factor," including the final value reached. Also, please provide a description of how the SPAR model was modified to account for this factor. What failure modes were considered, a failure of individual emergency diesel generators (EDG) in any combination or failure of the 4 EDGs as a set? Refer to Page 27 of the inspection report.
- 6) The SPAR model and SAPPHIRE engine used to perform the risk analysis.