

June 16, 2004

Mr. Mano K. Nazar
Senior Vice President and Chief Nuclear Officer
Indiana Michigan Power Company
500 Circle Drive
Buchanan, Michigan 49107

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING LICENSE AMENDMENT REQUEST TO REVISE CONTAINMENT REQUIREMENTS DURING MOVEMENT OF RECENTLY IRRADIATED FUEL ASSEMBLIES FOR THE DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 (TAC NOS. MC2472 AND MC2473)

Dear Mr. Nazar:

The Nuclear Regulatory Commission (NRC) staff has reviewed Indiana Michigan Power Company's February 14, 2004, application for Donald C. Cook Nuclear Plant Units 1 and 2, regarding the license amendment request to revise containment requirements during movement of recently irradiated fuel assemblies. The NRC staff has identified areas where additional information is needed to complete its review. Enclosed is the NRC staff's request for additional information.

The items in the enclosure were discussed with Mr. Steinmetz of your staff and a mutually agreeable target date of within 45 days of the date of this letter for your response was established. If you have any questions, please contact me at (301) 415-1446.

Sincerely,

/RA/

John G. Lamb, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosure: As stated

cc w/encl: See next page

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Request for Additional Information Regarding the License Amendment Request to
Revise Containment Requirements During Movement of Recently Irradiated Fuel Assemblies
for the D. C. Cook Nuclear Plant (CNP), Units 1 and 2

1. In Section 4, Technical Analysis, page 5, it was stated that the thyroid dose for 0-2 hour site boundary dose was 82.3 rem. It is stated on page 8 in Section 5.2, Applicable Regulatory Requirements/Criteria, with respect to acceptance criteria for a fuel handling accident that "the calculated doses at the exclusion boundary are well within the exposure guidelines of 10 CFR Part 100...well within shall mean 25 percent or less of 10 CFR Part 100, i.e., 75 rem to the thyroid"Although, the staff approved a previous amendment that accepted the 82.3 rem value, there was an additional conservatism in the way in which the plant was being operated. The closure of the containment was not assumed in the accident analysis. However, this technical specification required conservatism, i.e., closure of the containment is now proposed to be removed. Provide additional justification for the Nuclear Regulatory Commission (NRC) staff to consider in evaluating the proposed change in the light of removing this additional conservatism in a situation where the regulatory dose acceptance criterion of being well within (25 percent or less of) the limits of 10 CFR 100 is already exceeded?

2. In Section 3, the last paragraph on page 5 states the commitment to NUMARC 93-01. Part of the commitment states "These prompt methods need not completely block the penetrations nor be capable of resisting pressure, but are to enable the ventilation systems to draw from the postulated [fuel handling accident] FHA such that it can be treated and monitored." Please describe the degree of closure that will be achieved by the "prompt methods," specifically how much of an open area to the environment would be permitted. Also describe the ventilation systems that would be used to draw the release from the postulated FHA. Specifically, are the ventilation systems Engineered Safety Features (ESF) systems, do they have carbon adsorber filters and high-efficiency particulate air filters, are they tested in accordance with Regulatory Guide 1.52 or other standards, and do they have sufficient drawing capacity to assure that air flow is from environment to the containment? Would there be a test to determine that all air flow was into the containment in the event that the D. C. Cook procedure allows partial closure? Other licensees (specifically Millstone 3) have committed to a four bolt closure of the equipment hatch and made specific notation of the requirement in the TSs to close in the event of an FHA. Does D. C. Cook have the capability to make a similar commitment?.

ENCLOSURE

Donald C. Cook Nuclear Plant, Units 1 and 2

cc:

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