

November 4, 2004

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

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 - REQUEST FOR
ADDITIONAL INFORMATION REGARDING RESPONSE TO NUCLEAR
REGULATORY COMMISSION (NRC) BULLETIN 2003-01 (TAC NOS. MB9570
AND MB9571)

Dear Mr. Nazar:

The NRC staff has reviewed Indiana Michigan Power Company's August 7, 2003 (ML032260668), response to NRC Bulletin 2003-01, "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors," and 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. Waters of your staff, and a mutually agreeable target date of within 60 days of the date of this letter for your response was established. If you have any questions, please contact me at (301) 415-2296.

Sincerely,

/RA/

Carl F. Lyon, 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

Donald C. Cook Nuclear Plant, Units 1 and 2

cc:

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Attorney General
Department of Attorney General
525 West Ottawa Street
Lansing, MI 48913

Township Supervisor
Lake Township Hall
P.O. Box 818
Bridgman, MI 49106

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
7700 Red Arrow Highway
Stevensville, MI 49127

David W. Jenkins, Esquire
Indiana Michigan Power Company
One Cook Place
Bridgman, MI 49106

Mayor, City of Bridgman
P.O. Box 366
Bridgman, MI 49106

Special Assistant to the Governor
Room 1 - State Capitol
Lansing, MI 48909

Mr. John A. Zwolinski
Director, Design Engineering and
Regulatory Affairs
Indiana Michigan Power Company
Nuclear Generation Group 500 Circle Drive
Buchanan, MI 49107

Michigan Department of Environmental
Quality
Waste and Hazardous Materials Div.
Hazardous Waste & Radiological
Protection Section
Nuclear Facilities Unit
Constitution Hall, Lower-Level North
525 West Allegan Street
P. O. Box 30241
Lansing, MI 48909-7741

Michael J. Finissi, Plant Manager
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

Mr. Joseph N. Jensen, Site Vice President
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

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REQUEST FOR ADDITIONAL INFORMATION

BULLETIN 2003-01, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON
EMERGENCY SUMP RECIRCULATION AT PRESSURIZED-WATER REACTORS"

DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2

INDIANA MICHIGAN POWER COMPANY

DOCKET NOS. 50-315 AND 50-316

By letter dated August 7, 2003 (ML032260668), the Indiana Michigan Power Company (the licensee, or I&M) provided the 60-day response to Nuclear Regulatory Commission (NRC) Bulletin 2003-01 for the Donald C. Cook Nuclear Plant (CNP), Units 1 and 2. The Bulletin requested the licensee either (1) state that the emergency core cooling system (ECCS) and containment spray system (CSS) recirculation functions have been analyzed with respect to the potentially adverse post-accident debris blockage effects identified in the Bulletin and are in compliance with all existing applicable regulatory requirements, or (2) describe any interim compensatory measures that have been implemented or that will be implemented to reduce the interim risk associated with potentially degraded or nonconforming ECCS and CSS recirculation functions until an evaluation to determine compliance is complete. The NRC staff has completed its preliminary review of your response and has determined it needs the following additional information to complete our review:

1. On page 4 of Attachment 1 of your response, you discussed operator training on indications of and responses to sump clogging. However, your response does not completely discuss the operator training to be implemented. Please provide a detailed discussion of the operating procedures to be implemented, the indications of sump clogging that the operators are instructed to monitor, the criteria used to declare a sump clogging condition, and the response actions the operators are instructed to take in the event of sump clogging and loss of ECCS recirculation capability.
2. On page 9 of Attachment 1 of your response, you state that CNP emergency procedures are based on generic procedures provided by the Westinghouse Owners Group (WOG). You further stated that I&M considered certain WOG recommendations in determining if procedural modifications to delay switchover to sump recirculation should be implemented at CNP, and I&M determined that the procedural modifications were not appropriate. The WOG has developed operational guidance in response to Bulletin 2003-01 for Westinghouse and Combustion Engineering type pressurized-water reactors. This guidance was issued in March 2004. Please provide a discussion of your plans to consider implementing this new WOG guidance. Include a discussion of the WOG recommended compensatory measures that have been or will be implemented at your plant, and the evaluations or analyses performed to determine which of the WOG recommended changes are acceptable at your plant. Provide technical justification for those WOG recommended compensatory measures not being implemented by your plant. Also include a detailed discussion of the procedures being modified, the operator training being implemented, and your schedule for implementing these compensatory measures.
3. NRC Bulletin 2003-01 provides possible interim compensatory measures licensees could

ENCLOSURE

consider to reduce risks associated with sump clogging. In addition to those compensatory measures listed in Bulletin 2003-01, licensees may also consider implementing unique or plant-specific compensatory measures, as applicable. On pages 1 through 3 of Attachment 1 to your Bulletin 2003-01 response, you list a number of “plant-specific measures that are not identified in this Bulletin.” Please discuss any other possible unique or plant-specific compensatory measures you have considered for implementation at your plant. Include a basis for rejecting any of these additional considered measures.